

BrightTALK Privacy Notice for California Residents

To learn more about your CCPA privacy rights, please review the below privacy notice.

To exercise your access, data portability, deletion or “OPT OUT OF MY PERSONAL INFO” rights, please submit your request using one of the following options:

- Complete our web form available [here](#)
- Email us at: privacy@brighttalk.com
- Call us at: (888)-274-4111

Last Updated: April 1, 2022

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS supplements the information contained in BrightTALK’s [Privacy Policy](#) (collectively, “we,” “us,” or “our”), as well as any other privacy notices we may provide, and applies solely to visitors, users, and others who reside in the State of California (“Consumers” or “you”). We have adopted this notice to comply with the California Consumer Privacy Act of 2018, as amended, and implementing regulations (“CCPA”) and other California privacy laws. Any terms defined in the CCPA, other California privacy laws, or in our Privacy Policy have the same meaning when used in this notice.

A. Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a consumer or household (“Personal Information”). Personal Information does not include (i) publicly available information that is lawfully made available to the general public by way of federal, state, or local government records unless its use is not compatible with the purpose for which the data is maintained and made available in the government records or for which it is publicly maintained.

Personal information also does not include (ii) de-identified or aggregated consumer information; and (iii) information excluded from the CCPA’s scope, like: (a) health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data, and (b) Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

We have collected the following categories of Personal Information from Consumers within the last twelve (12) months:

Category	CCPA Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.	YES

B. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, address, telephone number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information. Some Personal Information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Nationality	YES
D. Commercial information.	Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	YES
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

Personal Information.

We obtain the categories of Personal Information listed in the table above from the following categories of sources:

- *Directly from You.* For example, (i) if you visit our websites, respond to a survey, participate in a telephone interaction, fill out a registration form or otherwise agree to become a user of BrightTALK (ii) if you fill out a form or communicate with us through one of our websites to receive information about our business to business services or to schedule a demonstration of our online, media, marketing, or data services products or programs, and (iii) if you expressed interest in being contacted by us at a trade show in which we participated or hosted.
- *Directly from our Clients or their agents.* For example, from documents or files that our Clients provide to us including, but not limited to, suppression lists/do not call lists and IP addresses corresponding to individuals who have either opted-out of Client communications or who have visited Client's websites, or related to the products or services our Clients are purchasing from us.
- *Indirectly from our Clients or their agents.* For example, through information we collect from our Clients in the course of providing services to them.
- *Directly and indirectly from activity on our websites.* For example, from observing your actions on our websites or through your submission of an online form requesting a demonstration or walkthrough for one of our products or services.
- *From Third Parties that contract with us or interact with us in connection with the services we perform.* For example, from (i) vendors and partners that help us to build contact lists, supplement or update your information in our database, or confirm/verify our records and information are accurate and up to date, (ii) third parties that may contact you, on our behalf, to provide you relevant content and/or to become a member, or (iii) third parties (including, other B2B contact providers) that integrate their services with ours or provide us access to their services.
- *Public Information.* We may collect Personal Information that you manifestly choose to make public, including through the services on our website or on social media.

B. Use of Personal Information

We may use, sell, or disclose the Personal Information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided. For example, if you provide us or our Service Providers with Personal Information as part of a telephone interaction, through completion and submission of an online registration form on a BrightTALK website, affiliate website, or vendor/partner website, or any other method or means of communication we will: (i) use that information to send you emails, newsletters, and other notices concerning our products or services, or news, that may be relevant to your professional interests, (ii) sell that information to our Clients so they may contact you with information about, and invitations for, products and services tailored to

your professional interests and responsibilities, or (iii) communicate with you, advertise to you or invite you connect with us or with your peers and with providers of technologies, goods, and services that may be relevant to your professional interests.

- To provide, support, personalize, and develop our websites, products, and services.
- To create, maintain, customize, and secure your member account with us.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your experience on our websites and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our websites, third-party sites, and via email or telephone (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our websites, products and services, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our websites, products, and services.
- As necessary or appropriate to protect the rights, property or safety of us, our Clients or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your Personal Information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us is among the assets transferred.

C. Disclosing or Selling of Personal Information

BrightTALK may disclose your Personal Information with other parties, including Service Providers, for a business purpose or may sell your Personal Information to third parties, including BrightTALK's Clients, subject to your right to opt-out of those sales (*see* Personal Information Sales Opt-Out and Opt-In Rights). When we disclose Personal Information for a business purpose, we enter into a contract that describes the purpose and requires the recipient to both keep that Personal Information confidential and not use it for any purpose except performing the contract.

1. Disclosing Personal Information for a Business Purpose

In the preceding twelve (12) months, BrightTALK has disclosed the following categories of Personal Information for a business purpose:

Category A: Identifiers.

Category B: California Customer Records Personal Information categories.

Category C: Protected classification characteristics under California or federal law.

Category D: Commercial information.

Category F: Internet or other similar network activity.

Category G: Geolocation data.

Category I: Professional or employment-related information.

Category K: Inferences drawn from other Personal Information.

In the preceding twelve (12) months, we have disclosed your Personal Information with the following categories of third parties for a business purpose:

- Service Providers and other professional advisors;
- Other Users pursuant to our [User Agreement](#); and
- Third parties to whom you or your agents authorize us to disclose your Personal Information in connection with products or services we provide to you.

2. Notice of the Right To OPT OUT of the Sale of Your Personal Information to Clients (Third Parties)

The CCPA prohibits third parties who purchase the Personal Information we hold from reselling it unless you have an opportunity to opt-out of the sale of your information. In the preceding twelve (12) months, BrightTALK has sold the following categories, or certain components of the following categories, of Personal Information:

Category A: Identifiers.

Category B: California Customer Records Personal Information categories.

Category C: Protected classification characteristics under California or federal law.

Category D: Commercial Information.

Category F: Internet or other similar network activity.

Category G: Geolocation data.

Category I: Professional or employment-related information.

Category K: Inferences drawn from other Personal Information.

We sell your Personal Information to the following categories of third parties:

- Our Clients; and

- Third parties to whom you or your agents authorize us to disclose your Personal Information in connection with products or services we provide to you.

D. Your Rights and Choices

The CCPA provides Consumers with specific rights regarding their Personal Information. This section describes your CCPA rights and explains how to exercise those rights.

1. Access to Specific Information and Data Portability Rights

In addition to the information disclosed to you in this policy, you have the right to request that we disclose to you the specific pieces of Personal Information we collected about you over the past 12 months subject to verifying your request. You also have the right to request that such information is delivered in a format that may be transmitted to another entity upon your verified request. (*See Exercising Access, Data Portability, and Deletion Rights*)

2. Deletion Request Rights

You have the right to request that we delete any of your Personal Information that we collected from you and retained in our databases, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete your Personal Information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our Service Providers to:

1. Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

3. Exercising the Right to Know, Access, Data Portability, and Deletion Rights

To exercise the right to know, access, data portability, and deletion rights described above, please submit a verifiable consumer request to us using one of the following options:

- Complete our web form available [here](#)
- Email us at: privacy@brighttalk.com
- Call us at: (888)-274-4111

Only you or a person registered with the California Secretary of State who you authorize to act on your behalf (a.k.a. an “authorized agent”), may make a verifiable consumer request related to your Personal Information. We will use reasonable methods to verify your request or that of your authorized agent including, for example, comparing the email address you used to register on BrightTALK or affiliated third party website.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use Personal Information provided in a verifiable consumer request to verify the requestor’s identity or authority to make the request.

4. Response Timing and Format

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to the email address associated with that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide may only cover the 12-month period preceding the verifiable consumer request’s receipt. The response we provide will also explain the reasons why we cannot comply with a request, if applicable. For data portability requests, we will endeavor to select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

5. Personal Information Sales Opt-Out and Opt-In Rights

If you are sixteen (16) years of age or older, you have the right to direct us to not sell your Personal Information at any time (the “right to opt-out”). Our business, as a business-to-business (“B2B”) provider, is targeted to business professionals. Therefore, we do not collect or sell the Personal Information of consumers we know are less than sixteen (16) years of age. If we learn that we have inadvertently collected the Personal Information of someone under the age of 16, we will immediately terminate the associated account and delete any data in connection with such registration and the user’s activity.

Consumers who opt-in to Personal Information sales may opt-out of future sales at any time.

In order to provide you with our services, it is necessary for us to provide and personalize ads, content, and communications based on your use of websites, including with information regarding your interests and your online interactions. If you request that we “do not sell” your Personal Information, as described in this Privacy Notice for California Residents (and our [Privacy Policy](#)), you will not be able to use any services we offer that require the continued use of the your business email address, such as maintaining your member account and providing you access to our free Premium Services. Accordingly, members who utilize the “Do Not Sell My Personal Info” link on our websites will be presented with the option to delete their account with BrightTALK and their associated Personal Information. If you make this request, you will still be able to access all the information and content that we offer on our websites to non-members. Further, you may register a new account with our websites at any time using a new corporate email address.

To exercise this right, you (or your authorized representative) may submit a request to us by visiting the following Internet Web page link [here](#).

E. Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. We may choose in the future to offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your Personal Information’s value and contain written terms that describe the program’s material aspects.

F. Other California Rights

California’s “Shine the Light” law (Civil Code Section § 1798.83) permits users of our websites that are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please send us an electronic message through our [website](#) or write us at privacy@brighttalk.com.

G. Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make material changes to this privacy notice, we will notify you by email or through a notice on our website homepage.

H. Contact Information and Accessibility

This notice can be made available in alternate formats upon request. If you have any questions or comments about this notice, our [Privacy Policy](#), the ways in which we collect and use your Personal Information, your choices and rights regarding such use, or if you wish to exercise your rights under California law, please do not hesitate to contact us at:

Website: www.brighttalk.com

Email: privacy@brighttalk.com

Phone: (888)-274-4111

Postal Address:

BrightTALK, Inc.

703 Market Street, 15th Floor

San Francisco, CA 94103

Attn: Data Protection Officer