



## GuestTek: Draft California Privacy Notice

**Effective Date:** August 2020

This California Privacy Notice (“Notice”) applies to “Consumers” as defined by the California Consumer Privacy Act (“CCPA”) and supplements other privacy policies or notices issued by Guest-tek Interactive Entertainment Ltd. (“Company” “we” “us”). In the event of a conflict between any other Company policy, statement, or notice and this Notice, this Notice will prevail with respect to California Consumers and their rights under the CCPA.

This Notice describes our collection, use, disclosure, and Sale of California Consumers’ Personal Information (PI), as well as rights California Consumers have under the CCPA. Terms defined in the CCPA that are used in this Notice have the same meanings as in the CCPA.

Consistent with the CCPA, job applicants, current and former employees, contractors, and subjects of certain business-to-business communications acting in their capacity as representatives of another business are not considered Consumers for the purposes of this Notice or the rights described herein.

In the event of a conflict between any other policy, statement, or notice and this Notice, this Notice will prevail as to California Consumers and their rights under the CCPA.

### **COLLECTION AND USE OF PERSONAL INFORMATION**

We collect PI about California Consumers as described in the table below.

<b>Category</b>	<b>Examples of PI Collected</b>	<b>Sources of PI</b>	<b>Purposes for PI Collection</b>	<b>Categories of Recipients</b>
<b>Identifiers</b>	Name, postal address, mac address, email address, phone number	Provided by Consumer or collected from the Consumer’s interactions with our website	Managing interactions and transactions; detecting security incidents and protecting against fraud; processing and customizing concurrent Consumer interactions	Information may be shared with service partners
<b>Customer / Individual Records</b>	Name, postal address, telephone number, email address, customer service case notes (payment card details are sent directly to PayPal and not seen nor stored by GuestTek).	Directly from the Consumer at time of purchase or during purchase verification	Managing interactions and transactions; detecting security incidents and protecting against fraud; processing and customizing concurrent Consumer interactions; marketing; verification of purchases by Consumer	Information may be shared with service partners
<b>Commercial Information / Purchase Details</b>	Customer ID, Transaction date, Purchased Item ID, Item Price, Invoice Total Price	Directly from the Consumer at time of purchase	Managing interactions and transactions; detecting security incidents and protecting against fraud; debugging; processing and	Information may be shared with service partners



Category	Examples of PI Collected	Sources of PI	Purposes for PI Collection	Categories of Recipients
			customizing concurrent Consumer interactions; internal research and development; quality control; marketing	
<b>Internet Usage Information</b>	Information regarding interactions with our website or advertisements	Consumer interactions with our website and advertisements	Detecting security incidents and protecting against fraud; internal research and development; debugging; quality control; marketing	Information may be shared with service partners; ISPs; analytics and other service partners
<b>Sensory Data</b>	Audio recordings of customer service calls	Collected from calls made by Consumers to Customer Service	Managing interactions and transactions; detecting security incidents and protecting against fraud; quality control	Information may be available to service providers
<b>Inferences from PI Collected</b>	Customer profiles reflecting preferences and predispositions	Data reflecting preferences are inferred from a Consumer's interactions with our website or advertisements	Detecting security incidents and protecting against fraud; marketing	Information may be shared with service partners

In addition, we may collect, use, and disclose your PI as required or permitted by applicable law. We do not treat de-identified data or aggregate consumer information as PI, and we reserve the right to convert, or permit others to convert, your PI into de-identified data or aggregate consumer information.

We may share your PI with our affiliates, service providers, vendors (including those that facilitate interest-based advertising and other advertising and marketing), and other parties as described in the table above. These parties may use your PI for some or all the above-listed business purposes, subject to the CCPA's restrictions and obligations.

We have not "Sold" (as the term "Sale" is defined by the CCPA) Consumer PI in the past year.

**CALIFORNIA PRIVACY RIGHTS**

Under the CCPA, California Consumers have certain rights which they may exercise independently or through an authorized agent. CCPA rights requests are subject to an identification and verification process. We will not fulfill a CCPA request unless we have been provided sufficient information for us to reasonably verify the identity of the requestor and the validity of the request.

Some PI we maintain about Consumers (e.g., clickstream data) is not sufficiently associated with enough PI about the Consumer for us to be able to verify that it is a particular Consumer's PI. Accordingly, we will not include such information in response to Consumer requests. If we cannot comply with a request, we will explain the reasons in our response. We will use PI provided in your request to verify your identity or



authority to make the request and to track and document request responses, unless you also provided the PI to us for another purpose.

We will make commercially reasonable efforts to identify Consumer PI that we collect, use, store, disclose, or otherwise process, and to respond to your California Consumer privacy rights requests. In some cases, particularly with voluminous and/or typically irrelevant data, we may provide you with a summary of your PI and give you the opportunity to elect whether you want us to provide the entire data set. Alternatively, we may direct you on how to access and copy responsive PI yourself. We may charge a reasonable fee or refuse to act upon a request if the request is excessive, repetitive, unfounded, or overly burdensome. If we determine that the request warrants a fee, or that we may decline to comply with the request, we will give you notice explaining why we made that decision. In the case of a fee, we will provide a cost estimate and the opportunity to accept such fees before charging you for responding to your request.

Your California Consumer privacy rights are described below. To make a request, please email us at [Privacy@guest-tek.com](mailto:Privacy@guest-tek.com) or call us Toll-free on 866-229-7155, select option 0 and then extension 8464. We will take appropriate steps to confirm the identity of a Consumer making a request for purposes of verifying the authenticity of the request. You may be required to provide certain PI to allow us to verify that you are the Consumer about whom the request is being made. Please promptly respond to any follow-up inquiries so that we may confirm your identity. If you request that we provide you with specific pieces of information about you, we will apply the heightened verification standards. An authorized agent may submit a request on behalf of a Consumer if the Consumer has provided the authorized agent with power of attorney in accordance with California law. Alternatively, the agent must (1) present verifiable written authorization from the Consumer that the agent has the Consumer's permission to submit the request; and (2) independently verify the agent's own identity with Company.

We may collect, use, and disclose your PI as required or permitted by applicable law. Please note we are not obligated to comply with consumer requests to the extent that doing so would infringe on our, or any other person's or party's, rights or conflict with applicable law.

### **Disclosure Rights**

You have the right to request that we disclose your PI that we have collected and are maintaining for the 12-month period prior to the request date. Consumer requests of this nature may be made no more than 2 times in a 12-month period.

- The categories of PI we have collected about you.
- The categories of sources from which we collected your PI.
- The business or commercial purposes for collecting or Selling your PI.
- The categories of third parties to whom we have shared your PI.
- The specific pieces of PI we have collected about you.
- A list of the categories of PI disclosed for a business purpose in the prior 12 months, or a statement that no such disclosure occurred.
- A list of the categories of PI Sold about you in the prior 12 months, or that no Sale occurred. If we Sold your PI, we will explain (1) the categories of your PI we have Sold, and (2) the categories of third parties to which we Sold PI.

You have the right to make or obtain a portable copy of your PI that we (1) have collected in the 12 months prior to the request date and (2) currently are maintaining. Please note that we retain PI for various time periods in accordance with applicable law and our internal recordkeeping policies and procedures.

### **"Do Not Sell" Rights**

We do not Sell California Consumer PI as those terms are defined in the CCPA. Some web browsers have options that may be characterized as "do not track" settings, which may or may not affect your settings related to our website. We do not understand them to operate in that manner or to signify a "do not sell"



request made by a Consumer. We understand that various parties are developing “do not sell” signals, and we may recognize certain such signals if we conclude such a program is appropriate.

### **Deletion Rights**

Except to the extent we have a basis for retention under the CCPA, you may request that we delete your PI that we have collected directly from you and are maintaining. Our retention rights include, without limitation, retaining PI to complete transactions and provide services you have requested or that are reasonably anticipated, for security purposes, for legitimate internal business purposes such as maintaining business records, to comply with law or otherwise cooperate with law enforcement, and to exercise or defend legal claims. Note also that we are not required to delete your PI that we did not collect directly from you.

### **Non-Discrimination Rights**

We will not discriminate against you in a manner prohibited by the CCPA because you exercise your CCPA rights.

### **California’s “Shine the Light” Law**

California Civil Code Section 1798.83 permits California customers 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 an email to [Privacy@guest-tek.com](mailto:Privacy@guest-tek.com) or write us at:

GuestTek  
Suite 600, 777 8 Avenue, SW  
Calgary, Alberta, Canada T2P 3R5

*Please note that “Shine the Light” rights and CCPA rights are established under different legal regimes and must be exercised separately.*

### **CONTACT US**

For more information regarding your California privacy rights, you may contact us Toll-free on 866-229-7155, select option 0 and then extension 8464 or email us at [Privacy@guest-tek.com](mailto:Privacy@guest-tek.com).

You may also write to us at

GuestTek  
Suite 600, 777 8 Avenue, SW  
Calgary, Alberta, Canada T2P 3R5