

NCCPT Privacy Policy

Effective Date: 11/01/2021

This Privacy Policy describes our policies on the collection, use, and disclosure of information about you in connection with your use of our services. In this policy, when we say “Website,” we mean <https://www.nccpt.com/> and any other microsites or mobile websites that we operate or use including those of our parent company, ISSA. “App” refers to our mobile application that we make available for download on your personal device. “Social Media Pages” are the official social media pages we operate on Facebook, Twitter, YouTube, LinkedIn, Pinterest, Instagram, and other social media platforms. If you have any questions about anything in this Privacy Policy, please email the ISSA Privacy Team at privacypolicy@issaonline.com.

1. INFORMATION WE COLLECT

We collect different types of information about our customers and Website visitors. In the past 12 months we may have collected:

- **Contact Information:** We may collect contact information, which includes personal information like name, email address, phone number, and physical address.
- **Location Information:** We may collect your location data in connection with your use of our Website, including geolocation, beacon based location, and GPS location. Our collection may depend on your device’s settings for location services.
- **Device Information:** When you visit our Website, interact with our Social Media Pages or online ads, or open our emails, we learn about your browser type and version, type of computer or mobile device, browser language, IP address, and other technical information about your device.
- **Demographic Information:** We may have access to demographic details about our Website users such as birthdate, gender, zip code, and other similar details.
- **Payment Details:** We may collect your payment information, such as credit card number and expiration date, in connection with an order or your account.
- **Call, Text, Mail, and Email Records:** If you call, text, mail, or email our customer service agents, we may keep records of those conversations. Our calls with you may be monitored and recorded for quality purposes.
- **Website and App Interactions:** We collect information about your interactions with our Website or App including pages visited, interest in content, access times, search activity, the pages that you view, and other surfing behavior.

- **Submitted Content:** We collect any content you submit to our Website, App, Social Media Pages, or to us in person including photos, videos, posts, or review contributions. This information could include personal information, depending on what information you provide.
- **Profile Information:** We may have access to profile details about consumers such as your preferences and Website behavior.
- **User Contacts:** We collect information you submit to us or choose to share with us from your personal device when you invite others to join or become your friend on ISSA.

2. HOW WE COLLECT INFORMATION

We may collect the information described above directly from you, from third parties we partner with, or through cookies or other automated means. These sources may include:

- **You:** We collect information directly from you, whenever you: make a purchase; visit our Website; contact us with questions or comments; upload content; enter our contests, sweepstakes, or promotions or contests or sweepstakes we are affiliated with; create an account; update your account profile; write a review; or use or like our Social Media Pages.
- **Your Device or Browser:** Certain information is automatically collected from your device or browser and analyzed when you visit our Website or interact with our Social Media Pages or online advertising.
- **Third Parties:** We work with third parties who provide services to us such as payment processors, analytics, research, or advertising companies. Your information may be collected and processed independently in accordance with the third parties' own privacy notices. These third parties may share information they have collected with us.
- **Social Media Platforms:** Social media platforms share information with us. You can learn more about how social media platforms collect and use your information by reviewing their privacy policies and settings.
- **Cookies:** We use cookies, web beacons, tags, scripts, pixels, and other similar technologies to automatically collect information when you visit our Website. We also contract with third party advertising or analytics companies to serve you online ads on other websites. These companies use cookies or similar technologies to collect information about your interactions with our Website and interactions with other websites. These advertising companies may use and share the information gathered to deliver ads more tailored to your interests. Any information collected by us or by third parties through the use of cookies or similar technologies may be linked with other information we collect about you. For a more thorough explanation of what cookies are and how they operate, please visit aboutcookies.org or allaboutcookies.org.

3. HOW WE USE THE INFORMATION WE COLLECT

We may use the information we collect for the following business purposes:

- **Fulfilling Your Requests:** Fulfilling your orders and other requests, including, but not limited to, processing your transactions and populating forms for future transactions.
- **Advertising:** Presenting advertising online, by email, or through other communication channels, including through partnerships with social media platforms and internet search engines.
- **Understanding Our Customers:** Analyzing your activity with us (including your interactions with our Website, Social Media Pages, App, and emails or other forms of communication), monitoring the effectiveness of our advertising and communications, and analyzing trends and statistics.
- **Personalization:** Using your preferences and other collected information to personalize our relationship with you, including presenting customized communication, advertising and experiences on our Website, App, emails, and ads on social media.
- **Communications:** Communicating with you about our services, responding to your inquiries, and providing you certain administrative, transactional, or legal messages.
- **Promotions:** Running contests, sweepstakes, or other promotions.
- **Customer Experience:** Serving content on our Website, App, and Social Media Pages, developing our services, and constantly improving our customers' experience, including but not limited to, troubleshooting customer service issues and improving Website functionality.
- **Security:** Protecting NCCPT and our customers from fraud, security threats, and other illegal or harmful activity.
- **Legal Obligations:** Complying with legal and regulatory requirements and responding to requests from courts or other government bodies.

4. HOW YOUR INFORMATION IS SHARED WITH SERVICE PROVIDERS AND THIRD PARTIES AND FOR WHAT PURPOSES

We may share personal information with third parties for certain purposes. For example, we share personal information with:

- **Service Providers:** We partner with third parties to assist with many aspects of our business, including providing you services, fulfilling your orders, advertising, analyzing your interests and activity on our Website and Social Media Pages, and helping us communicate with you. These third parties may provide services related to any of the purposes described in HOW WE USE THE INFORMATION WE COLLECT, and we may share with them any types of

information described in INFORMATION WE COLLECT. We may also receive information collected by these third parties and combine it with the information we have collected. Your information may also be collected and processed by third parties, such as the payment providers you select, who will process your information independently in accordance with their own privacy notices.

- **Marketing Providers:** We partner with third parties to assist with the advertising and marketing of our business. We may share with them the types of information described in INFORMATION WE COLLECT.
- **Content Partners:** We allow third party partners to use and display some of the public content available through the Website, such as your photos, reviews, and other information.
- **Other Third Parties:** We will disclose information about you, including to government bodies or law enforcement agencies, when we believe it to be necessary for compliance with the law or to protect our Website users, our Website, or the public.

If you are a California resident, you can learn more about your privacy rights below in the California Privacy Rights section or on our [Do Not Sell My Personal Information](#) page.

5. YOUR PRIVACY CHOICES

You can control the information we collect and use in the following ways:

- **Location Information:** You can disable location-based services on your mobile device or web browser by adjusting the settings on your device or browser. This will prevent our Website from accessing your location information. Note that some services may not be available if you disable location-based services.
- **Emails:** You can unsubscribe from emails and other electronic notifications by a link included in every such communication.
- **Online Account:** You can keep your contact information and payment methods accurate and up to date by logging into your account on our Website. If you wish to cancel your account, email us at privacypolicy@issaonline.com.
- **Account Settings:** When you sign up for an account or use certain features, you are opting to receive messages from other users, businesses, and from ISSA/NCCPT. You can manage some of your messaging preferences through your account settings, but note that you cannot opt out of receiving certain administrative, transactional, or legal messages from ISSA/NCCPT.
- **Social Media:** This Privacy Policy does not cover the privacy and security practices of social media platforms on which NCCPT has Social Media Pages. Please review the terms, policies, and settings of those social media platforms if you have questions about how they collect and use your data.

- **Online Advertising:** For information about opting out of third party advertising, visit: <https://optout.networkadvertising.org/> or <https://digitaladvertisingalliance.org/>. You will leave this Website for a separately managed online site where you can specify your preferences. We may use more than one third party company for placing this advertising, which would require you to opt out of each company.

6. CHILDREN'S PRIVACY

Our Website, App, and Social Media pages are intended for adults. No one under the age of 16 should share any personal information with us, including by creating an account or making a purchase from our Website. We do not knowingly collect personal information of children under the age of 16. To request the deletion of personal information relating to a child under the age of 16, please [complete this form](#).

7. DATA RETENTION AND ACCOUNT TERMINATION

You can close your account by contacting us. We will remove certain public posts from view and/or dissociate them from your account profile, but we may retain information about you for the purposes authorized under this Privacy Policy unless prohibited by law. For example, we may retain information to prevent, investigate, or identify possible wrongdoing in connection with the Website or to comply with legal obligations.

8. SECURITY

We take steps to help protect the confidentiality and security of your personal information. Although we use measures to protect your personal information, in general, information transmitted through the Internet may not be completely secure. Accordingly, we cannot guarantee the security of information provided over the Internet. Your transmissions are, therefore, at your own risk. You can protect your information by selecting strong, unique passwords for the Website and any associated email addresses. If you have concerns about the security of your account, or wish to alert us of any potential vulnerabilities, please contact us at privacypolicy@issaonline.com.

9. SUPPORTED WEB BROWSERS AND DO NOT TRACK SIGNALS

We recommend that you use the latest web browser versions to optimize your experience. Older web browser versions may not be able to access or utilize all

pages on our Website as intended. We may not be able to receive or honor web browser “Do Not Track” signals and our Website may continue to collect information in the manner described within this Privacy Policy.

10. WEBSITE TERMS AND CONDITIONS

This privacy policy constitutes an integrated part of NCCPT’s [Terms of Service](#) and ISSA’s [Terms & Conditions](#).

11. UPDATE

We reserve the right to modify, alter or otherwise update this Privacy Policy at any time, so we encourage you to review this policy from time to time. Changes to this Privacy Policy are effective at the time they are posted and your continued use of our Website after posting will constitute acceptance of, and agreement to be bound by, those changes. If we make any material changes to our privacy practices, we will update this Privacy Policy and change the effective date at the top of this page.

12. CONTACT INFORMATION

Please send your privacy-related questions, comments, and concerns to us via email at privacypolicy@issaonline.com or by calling us at (805) 301-6034.

13. CALIFORNIA PRIVACY RIGHTS

As a resident of California, you have rights under the California Consumer Privacy Act, California Civil Code § 1798.100 et seq., (with any implementing regulations and as may be amended from time to time, “CCPA”) relevant to your Personal Information (as defined under the CCPA), as well as other laws. The rights described herein are subject to exemptions under the CCPA and other limitations under applicable law.

California Consumer Rights Under the CCPA: If your Personal Information is subject to the CCPA, you may have certain privacy rights with regard to that information. You may have the right to:

- Request that we provide you access to the following no more than twice in a 12-month period:
 - the categories and specific pieces of Personal Information that we have collected about you;
 - the categories of sources from which the Personal Information is collected;
 - the business or commercial purpose for collecting or sharing your Personal Information;

- o the categories of third parties with whom we share your Personal Information; and
- o the categories of Personal Information that are sold (as defined under the CCPA) and the categories of third parties to whom the Personal Information was sold.
- Request that we delete your Personal Information, subject to exceptions under the CCPA or other applicable law; and
- Request that we not “sell” your Personal Information by opting out of the sale of your Personal Information.

California residents also have the right not to receive discriminatory treatment for the exercise of any of the privacy rights conferred by the CCPA, as described in this section. We will not discriminate against you because you have exercised any of your rights under the CCPA.

How to Submit a Request

If you wish to exercise your right to access your Personal Information, to opt out of the sale of your Personal Information, or to request deletion of your Personal Information, please submit your request through this [webform](#) or call (805) 301-6034. Please help us by providing your full name, email, and home address, and clearly indicate which right you wish to exercise. The information collected through this process will be used only for responding to your request.

We are required to provide you with access to your Personal Information or delete your Personal Information only in response to a verifiable consumer request. We will compare the information you provide to us to any information we may have in our possession in order to verify your request. We may also contact you to request additional information in relation to your request. The information you provide must match the information we have in our possession. This measure is in place to help ensure that Personal Information is not disclosed to any person who does not have the right to receive it. The information collected through this process will be used for verification purposes only.

For more information on your right to opt-out of the sale of your Personal Information, please visit ISSA’s [Do Not Sell My Personal Information](#) page.

Requests Made Through Agents

Please note that you may authorize an agent to exercise any of these rights on your behalf. If you use an agent, we will take measures to verify your agent’s authorization similar to the verification described above for fulfilling any access or deletion requests. We may require more information to ensure proper verification of your agent’s identity and authorization.

Categories of Personal Information Sold

In the previous 12 months, ISSA may have sold (as defined under the CCPA) the following categories of Personal Information: device information, location information, website and app interactions, transactional data, social media usage, submitted content, and profile information. The Personal Information has been sold to the following categories of third parties: Marketing Providers and Content Partners.

Categories of Personal Information Disclosed for a Business Purpose

We share personal information about you with service providers and third parties for business purposes, such as operational purposes and other purposes related to providing you with the products and services you seek from us. For more information about the business purposes for which we disclose personal information, please see HOW INFORMATION IS SHARED WITH SERVICE PROVIDERS AND THIRD PARTIES AND FOR WHAT PURPOSES, above, and please see INFORMATION WE COLLECT, above, for what types of information may be shared.

Additional California Privacy Rights

California residents may also ask us to provide them with (i) a list of certain categories of personal information that we have disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year, and (ii) the identity of those third parties. California residents may make one request per calendar year.

To make this request, please complete this [webform](#). In your request, please include a subject line that states “CA Shine the Light Request”, state that you are a California resident, and provide a current California address for our response.