

Skyhigh Supplemental California Privacy Notice with California Consumer Privacy Act Disclosures

Last Updated: September 5, 2023

These disclosures are provided by Musarubra LLC (“Skyhigh”) and apply solely to residents of the State of California (“consumers” or “you”) with respect to personal information Skyhigh processes as a business. Any terms defined in the California Consumer Privacy Act of 2018, as amended from time to time, including by the California Privacy Rights Act of 2020 and its implementing regulations (“CCPA”) have the same meaning when used in these disclosures. These disclosures do not reflect our collection, use, or disclosure of California residents’ personal information, or data subject rights, where an exception or exemption under the CCPA applies. If you wish to print this Notice, please do so from your web browser or by saving the document as a PDF.

1. Notice at Collection

We have set out below categories of personal information about California residents we collect. We do not sell or share for cross context behavioral advertising any personal information of California residents. The California Consumer Privacy Act Privacy Policy is in section 2 of these disclosures.

Category of personal information

Non-Sensitive Personal Information

Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.

Specifically, name, address, email address, IP address, employee ID, unique identifier, and phone number.

Any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information, but excluding publicly available information that is lawfully made available to the general public from federal, state, or local government records.

(The categories of personal information described in the California Customer Records Act (Cal. Civ. Code § 1798.80(e))

Specifically, name, phone number, billing name and address, and credit card number.

Characteristics of protected classifications under California or federal law.

Specifically, age (40 years or older), race, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status.

Category of personal information

Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

Biometric Information.

Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an internet website application, or advertisement.

Specifically, browser type and language, IP address, and actions taken on the company's website (such as the web pages viewed and the links clicked).

Geolocation data.

Audio, electronic, visual, thermal, olfactory, or similar information.

Professional or Employment related information.

Specifically, employee job title, employee postal address, employee compensation information, employee ID, employee's employment history; and the annual revenues, number of employees, and industry of organization using the Services.

Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99).

Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Specifically, profile information reflecting a consumer's preferences.

Sensitive Personal Information

A consumer's social security, driver's license, state identification card, or passport number

A consumer's account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.

Specifically, account log-in with credentials.

A consumer's IP address to approximate your location.

A consumer's racial or ethnic origin, religious or philosophical beliefs, or union membership.

The contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication.

A consumer's genetic data.

The processing of biometric information for the purpose of uniquely identifying a consumer.

Category of personal information

Personal information collected and analyzed concerning a consumer's health.

Personal information collected and analyzed concerning a consumer's sex life or sexual orientation.

We use non-sensitive personal information:

- To perform the services requested by individuals who register or visit our sites;
- For marketing purposes, such as sending information about Skyhigh and its partners and promoting events;
- To check the financial qualifications of prospective customers and collect payment for the services;
- To operate and improve our sites;
- To provide personalized information about Skyhigh; and
- To process and investigate reports under Skyhigh codes and policies for employees.

We use sensitive personal information as reasonably necessary and proportionate:

- To perform the services or provide the goods reasonably expected;
- To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, or confidentiality of stored or transmitted personal information, including in or via our premises, computers, software, networks, communications devices, and other similar system;
- To resist malicious, deceptive, fraudulent, or illegal actions directed at us and to prosecute those responsible for those actions;
- To ensure the physical safety of natural persons;
- For short-term, transient use;
- To perform services on behalf of us;
- To verify or maintain the quality or safety of our services and products;
- To improve, upgrade, or enhance our services and products;
- To collect or process it where such collection or processing is not for the purpose of inferring characteristics about a consumer; and
- To perform functions that are required under laws that apply to us.

We retain each of the categories of personal information collected under this Privacy Notice at Collection as long as necessary to fulfill the purpose(s) for which it was collected, provide our services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws. Please find our CCPA Privacy Policy directly below.

2. California Consumer Privacy Act Privacy Policy

Last Updated: January 1, 2023

Our Personal Information Handling Practices in 2022

We have set out below categories of personal information about California residents we have collected, and as applicable disclosed, for a business purpose in the preceding 12 months. The table is followed by a description of the purposes for which we collected personal information. In the preceding 12 months we did not sell or share for cross context behavioral advertising, the personal information of California residents.

Category of personal information	Did we collect? If so, from what source?	Did we disclose? If so, to whom and for what purpose?
<i>Non-Sensitive Personal Information</i>		
Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers. <p>Specifically, name, address, email address, IP address, employee ID, unique identifier, and phone number.</p>	Yes, from the following sources: <ul style="list-style-type: none"> You Your Device 	Yes, to the following third parties: <ul style="list-style-type: none"> Service Providers Business Partners We disclosed for the purpose of: <ul style="list-style-type: none"> Providing the products or services, including customer service; Providing certain features on our sites; Hosting and maintaining our sites; Ensuring the quality of information provided; and Providing marketing and promotional assistance.
Any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number,	Yes, from the following sources: <ul style="list-style-type: none"> You Your Device 	Yes, to the following third parties: <ul style="list-style-type: none"> Service Providers Business Partners We disclosed for the purpose of: <ul style="list-style-type: none"> Providing the products or services, including customer service; Providing certain features on our sites; Hosting and maintaining our sites; Ensuring the quality of information provided; Processing credit card payments; and Providing marketing and promotional assistance.

Category of personal information	Did we collect? If so, from what source?	Did we disclose? If so, to whom and for what purpose?
<p>driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information, but excluding publicly available information that is lawfully made available to the general public from federal, state, or local government records. (The categories of personal information described in the California Customer Records Act (Cal. Civ. Code § 1798.80(e))</p> <p>Specifically, name, phone number, billing name and address.</p>		
<p>Characteristics of protected classifications under California or federal law.</p> <p>Specifically, age (40 years or older), race, medical condition, physical or mental disability, sex</p>	<p>Yes, from the following sources:</p> <ul style="list-style-type: none"> You (optional) 	<p>Yes, to the following third parties:</p> <ul style="list-style-type: none"> Service Providers <p>We disclosed for the purpose of:</p> <ul style="list-style-type: none"> Facilitating the performance of certain administrative tasks and functions relating to general employment and for processing and investigating reports under Skyhigh's codes and policies.

Category of personal information	Did we collect? If so, from what source?	Did we disclose? If so, to whom and for what purpose?
(including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status.		
Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes, from the following sources: <ul style="list-style-type: none"> ● You ● Your Device 	Yes, to the following third parties: <ul style="list-style-type: none"> ● Service Providers ● Business Partners We disclosed for the purpose of: <ul style="list-style-type: none"> ● Providing the products or services, including customer service; ● Providing certain features on our sites; ● Ensuring the quality of information provided; and ● Providing marketing and promotional assistance
Biometric Information.	N/A	N/A
Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an internet website application, or advertisement.	Yes, from the following sources: <ul style="list-style-type: none"> ● You ● Your Device ● Service Providers 	Yes, to the following third parties: <ul style="list-style-type: none"> ● Service Providers ● Business Partners We disclosed for the purpose of: <ul style="list-style-type: none"> ● Providing certain features on our sites; ● Gaining analytical insights; ● Hosting and maintaining our sites; ● Detecting and protecting against security events; ● Ensuring the quality of information provided; and ● Providing marketing and promotional assistance.
Specifically, browser type and language, IP address, and actions taken on the company's website (such as the web		

Category of personal information	Did we collect? If so, from what source?	Did we disclose? If so, to whom and for what purpose?
<p>pages viewed and the links clicked).</p> <p>Geolocation data.</p>	<p>Yes, from the following sources:</p> <ul style="list-style-type: none"> You Your Device 	<p>Yes, to the following third parties:</p> <ul style="list-style-type: none"> Service Providers Business Partners <p>We disclosed for the purpose of:</p> <ul style="list-style-type: none"> Providing certain features on our sites; Gaining analytical insights; Hosting and maintaining our sites; Detecting and protecting against security events; Ensuring the quality of information provided; and Providing marketing and promotional assistance.
<p>Audio, electronic, visual, thermal, olfactory, or similar information.</p> <p>Specifically, call recordings (e.g., customer service calls)</p>	<p>Yes, from the following sources:</p> <ul style="list-style-type: none"> You Your Device 	<p>Yes, to the following third parties:</p> <ul style="list-style-type: none"> Service Providers Business Partners <p>We disclosed for the purpose of:</p> <ul style="list-style-type: none"> Gaining analytical insights; Providing customer service; and Ensuring the quality of information provided.
<p>Professional or Employment related information.</p> <p>Specifically, employee job title, employee postal address, employee compensation information, employee ID, driver's license, passport, employee's employment history; and the annual revenues, number of employees, and industry of organization using the Services.</p>	<p>Yes, from the following sources:</p> <ul style="list-style-type: none"> You 	<p>Yes, to the following third parties:</p> <ul style="list-style-type: none"> Service Providers Business Partners <p>We disclosed for the purpose of:</p> <ul style="list-style-type: none"> Ensuring the quality of information provided; Providing marketing and promotional assistance; and Facilitating the performance of certain administrative tasks and functions relating to general employment and for processing and investigating reports under Skyhigh's codes and policies.

Category of personal information	Did we collect? If so, from what source?	Did we disclose? If so, to whom and for what purpose?
Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99).	Yes, from the following sources: <ul style="list-style-type: none"> You 	Yes, to the following third parties: <ul style="list-style-type: none"> Service Providers Business Partners We disclosed for the purpose of: <ul style="list-style-type: none"> Ensuring the quality of information provided; and Facilitating the performance of certain administrative tasks and functions relating to general employment and for processing and investigating reports under Skyhigh's codes and policies.
Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Yes, from the following sources: <ul style="list-style-type: none"> You Your Device 	Yes, to the following third parties: <ul style="list-style-type: none"> Service Providers Business Partners We disclosed for the purpose of: <ul style="list-style-type: none"> Providing certain features on our sites; Gaining analytical insights; Hosting and maintaining our sites; Detecting and protecting against security events; Ensuring the quality of information provided; and Providing marketing and promotional assistance.
<i>Sensitive Personal Information</i>		
A consumer's social security, driver's license, state identification card, or passport number	Yes, from the following sources: <ul style="list-style-type: none"> You 	Yes, to the following third parties: <ul style="list-style-type: none"> Service Providers We disclosed for the purpose of: <ul style="list-style-type: none"> Facilitating the performance of certain administrative tasks and functions relating to general employment and for processing and investigating reports under Skyhigh's codes and policies.
A consumer's account log-in, financial account, debit card, or credit card number in combination with any required	Yes, from the following sources: <ul style="list-style-type: none"> You Your Device 	Yes, to the following third parties: <ul style="list-style-type: none"> Service Providers Business Partners We disclosed for the purpose of: <ul style="list-style-type: none"> Providing the products or services, including customer service;

Category of personal information	Did we collect? If so, from what source?	Did we disclose? If so, to whom and for what purpose?
<p>security or access code, password, or credentials allowing access to an account.</p> <p>Specifically, account log-in with credentials.</p>		<ul style="list-style-type: none"> • Hosting and maintaining our sites; and • Detecting and protecting against security events.
<p>A consumer’s precise geolocation.</p>	N/A	N/A
<p>A consumer’s racial or ethnic origin, religious or philosophical beliefs, or union membership.</p>	<p>Yes, from the following sources:</p> <ul style="list-style-type: none"> • You (optional) 	<p>Yes, to the following third parties:</p> <ul style="list-style-type: none"> • Service Providers <p>We disclosed for the purpose of:</p> <ul style="list-style-type: none"> • Facilitating the performance of certain administrative tasks and functions relating to general employment and for processing and investigating reports under Skyhigh’s codes and policies.
<p>The contents of a consumer’s mail, email, and text messages unless the business is the intended recipient of the communication.</p>	N/A	N/A
<p>A consumer’s genetic data.</p>	N/A	N/A
<p>The processing of biometric information for the purpose of uniquely identifying a consumer.</p>	N/A	N/A
<p>Personal information collected and analyzed concerning a consumer’s health.</p>	N/A	N/A
<p>Personal information collected and analyzed concerning a consumer’s sex life</p>	N/A	N/A

Category of personal information	Did we collect? If so, from what source?	Did we disclose? If so, to whom and for what purpose?
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or sexual orientation.

Business or Commercial Purpose for Collecting Personal Information

We use the personal information for the following business purposes:

- To verify your identity;
- To perform the services requested by individuals who register or visit our sites;
- For marketing purposes, such as sending information about Skyhigh and its partners and promoting events;
- To check the financial qualifications of prospective customers and collect payment for the services;
- To operate and improve our sites;
- To provide personalized information about Skyhigh;
- To process and investigate reports under Skyhigh codes and policies for employees;
- To respond to law enforcement requests and as required by applicable law or court order;
- To prepare for and give effect to any mergers, acquisitions, business sales or similar transactions; and
- To otherwise establish, defend or protect Skyhigh's rights or interests, including in the context of anticipated or actual litigation with third parties.

We do not have actual knowledge that we sell or share for cross context behavioural advertising, the personal information of California residents under 16 years of age.

CCPA Rights

As a California resident, you have the following rights under the CCPA:

- The **right to know** what personal information we have collected about you, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom we disclose personal information, and the specific pieces of personal information we have collected about you. You may only exercise your right to know twice within a 12-month period.
- The **right to delete** personal information that we have collected from you, subject to certain exceptions.
- The **right to correct** inaccurate personal information that we maintain about you.
- The **right to opt-out of the sale or sharing** of your personal information by us. We do not sell or share for cross-context behavioral advertising any of the categories of personal information that we collect about California residents.

- The **right to limit** our use and disclosure of sensitive personal information to purposes specified in Cal. Civil Code 1798.121(a). We do not use or disclose sensitive personal information for purposes other than those specified in Cal. Civil Code 1798.121(a).
- The **right not to receive discriminatory treatment** by the business for the exercise of privacy rights conferred by the CCPA, in violation of California Civil Code § 1798.125, including an employee's, applicant's, or independent contractor's right not to be retaliated against for the exercise of their CCPA rights.

How to Exercise CCPA Rights

Methods of Submission and Instructions: To submit a request to exercise your **rights to know, delete or correct**, please call +1 (888) 847-8766 (toll free) or populate our web form ([Individual Data Request Form](#)).

Verification: Only you, or someone legally authorized to act on your behalf, may make a request related to your personal information. You may designate an authorized agent by taking the steps outlined under "Authorized Agent" further below. In your request or in response to us seeking additional information, you, or your authorized agent, must provide sufficient information to allow us to reasonably verify that you are, in fact, the person whose personal information was collected which will depend on your prior interactions with us and the sensitivity of the personal information being requested. We may ask you for information to verify your identity and, if you do not provide enough information for us to reasonably verify your identity, we will not be able to fulfil your request. We will only use the personal information you provide to us in a request for the purposes of verifying your identity and to fulfill your request.

Authorized Agents: You can designate an authorized agent to make a request under the CCPA on your behalf if:

- The authorized agent is a natural person or a business entity and the agent provides proof that you gave the agent signed permission to submit the request; and
- You directly confirm with Skyhigh that you provided the authorized agent with permission to submit the request.

If you provide an authorized agent with power of attorney pursuant to Probate Code sections 4121 to 4130, it may not be necessary to perform these steps and we will respond to any request from such authorized agent in accordance with the CCPA.

Contact Us

If you have any questions or comments about these disclosures or our practices, please contact us at:

Email address: privacy@trellix.com

Postal address:

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