



California Consumer Privacy Act Privacy Notice

This Privacy Notice for California Residents supplements the information contained in Traditional Medicinals' ("TM" or "Company" or "we") [Privacy Policy](#) and applies solely to visitors, users, and others who reside in the State of California ("consumers" or "you"). This notice is in compliance with the California Consumer Privacy Act of 2018 ("CCPA"). Any terms defined in the CCPA have the same meaning as used in this notice.

1. Information We Collect

Our website collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device ("personal information"). In particular, TM has collected (or not collected, if indicated below) the following categories of personal information from its consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, mailing or postal address, unique personal identifier, online identifier Internet Protocol address, email address, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (California Civil Code § 1798.80(e)).	A name, signature, address, telephone number, or other similar information capable of being associated with an individual. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), veteran or military status.	NO
D. Commercial information.	Records of products or services purchased, obtained, or considered.	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.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
J. Non-public education information (under 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 personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

TM obtains the categories of personal information listed above from the following categories of sources:

- Direct interactions. You may give us your information by filling in forms or by corresponding with us by mail, phone, email or in-person. This includes, but may not be limited to, personal data you provide when you:
 - Subscribe to our email list;
 - Request marketing materials be sent to you;
 - Interact with our website such as through modules or taking quizzes;
 - Interact with social media by visiting TM pages, commenting on or liking posts;
 - Enter a competition, promotion or survey; or

- Provide information in-person at industry events or other venues, or providing information by phone or email.
- Automated technologies or interactions. As you interact with our website, we may automatically collect data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive technical about you if you visit other websites employing our cookies. Please see our [Privacy Policy](#) for further details.
- Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:
 - Technical data from the following parties:
 - (a) Analytics providers such as Google;
 - (b) Advertising networks such as Google Adwords, Amazon ads; and
 - Data from data brokers or aggregators including trade show organizers and other professional association.
 - Data from publicly available sources such as internet search engines.

2. Use of Personal Information

We may use and/or disclose the personal information we collect for one or more of the following business purposes:

- To manage our relationship with you which will include:
 - (a) Notifying you about changes to our terms or privacy policy
 - (b) Asking you to leave a review or take a survey
- To enable you to partake in a prize draw, competition or complete a survey
- To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)
- To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you
- To use data analytics to improve our website, products/services, marketing, customer relationships and experiences
- To make suggestions and recommendations to you about goods or services that may be of interest to you

TM will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

3. Sharing Personal Information

TM may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we require that the recipient both keep that personal information confidential and not use it for any purpose except performing the contract.

We share your personal information with the following categories of third parties:

- Service providers acting as data processors.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- Regulators and other authorities acting as processors or joint controllers based who require reporting of processing activities in certain circumstances.

Disclosures of Personal Information for a Business Purpose

In the preceding twelve (12) months, Company has disclosed the following categories of personal information for a business purpose:

- Category A: Identifiers.
- Category B: California Customer Records personal information categories.
- Category D: Commercial information.

In the preceding twelve (12) months, Company has not disclosed the following categories of personal information for a business purpose:

- Category C: Protected classification characteristics under California or federal law.
- Category E: Biometric information.
- Category F: Internet or other similar network activity.
- Category G: Geolocation data.
- Category H: Sensory data.
- Category I: Professional or employment-related information.
- Category J: Non-public education information.
- Category K: Inferences drawn from other personal information.

We disclose your personal information for a business purpose to the following categories of third parties:

- Service providers acting as data processors.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- Regulators and other authorities acting as processors or joint controllers based who require reporting of processing activities in certain circumstances.

Sales of Personal Information

In the preceding twelve (12) months, Company had not sold any categories of personal information (for both minors and non-minors). TM does not sell personal information to third parties.

4. Your Rights and Choices

The CCPA provides consumers who are California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that TM disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information, if any.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we disclosed your personal information for a business purpose, the personal information categories that each category of recipient obtained.

Deletion Request Rights

You have the right to request that TM delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

TM may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which TM 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.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- 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.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us to any of the following:

1. Calling us at 1-800-543-4372; or
2. Completing the web form available at <https://www.traditionalmedicinals.com/contact/>

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

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

1. Provide sufficient information that allows us to reasonably verify you are the person about whom TM collected personal information or an authorized representative; and
2. Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

TM 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. TM will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We will respond to a verifiable consumer request within forty-five (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 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 will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will 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. Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

6. Contact Information

If you have any questions or comments about this notice, the ways in which TM collects and uses your information described in this privacy policy, your choices and rights regarding such use, or wish to exercise your rights under California law, please contact us at:

Phone: 1-800-543-4372

Website: <https://www.traditionalmedicinals.com/contact/>

Last updated December 31, 2019.