

California Residents

The California Consumer Privacy Act (CCPA) requires us, the Gurstel Law Firm, P.C. (“Gurstel”), to notify California residents (unless an exemption applies) of the categories of personal information we collect about them, with reference to the categories set forth under the CCPA, and the purposes for which we will use such categories of personal information. Specifically, the CCPA provides California consumers with the following three rights:

1. The Right to Know
2. The Right to Delete
3. The Right to Opt Out

Right to Know

As a California consumer you have the right to know what personal information Gurstel collects, uses, discloses, and sells. You may either request disclosure of specific pieces of information about you or request the disclosure of categories of information about you (see below about the different categories of information).

Please be advised that we do not sell any personal information to third parties. We also do not disclose information to credit reporting agencies.

Right to Delete

The CCPA also provides consumers the right to request deletion of their information, subject to various exceptions. The information that Gurstel collects falls within an exception and does not have to be deleted upon request. Nonetheless, such a request can be made to Gurstel and an explanation will be provided if the requested information is not deleted.

Right to Opt Out

The CCPA also provides for the right to opt out of the sale of personal information. However, we do not sell personal information.

How to Make Requests

Requests for the information described above can be made to Gurstel at 877-344-4002 (toll-free number) or by mailing us a written request at 9320 East Raintree Drive, Scottsdale, AZ 85260. Once we receive your request, we will compare information you provided with the information we already have. If we can verify that the request came from you, we will provide the required information requested by you for the preceding 12 months. We will match 2-3

personal information data points, such as Social Security number, date of birth or address, to verify that the request came from you, the consumer. If we cannot verify that the request came from you, we will, accordingly, notify you.

You, the consumer, will not receive discriminatory treatment from Gurstel for the exercise of the privacy rights conferred by the CCPA. You may designate an authorized agent to make a request under the CCPA. You must provide either a power of attorney or written authorization to us.

Categories of Personal Information Collected

The relevant categories of personal information that Gurstel *may* collect about California residents includes, but is not limited to, the following information:

- **Identifiers:** real name, alias, postal address, unique personal identifier, online identifier, IP address, email address, account name, Social Security number or other similar identifiers.
- **Customer records:** paper and electronic customer records containing personal information, such as name, signature, Social Security number, physical characteristics or description.
- **Protected classifications under California or federal law:** age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability.
- **Commercial information:** records of personal property; products or services purchased, obtained, or considered; or other purchasing or consuming histories or tendencies.
- **Internet or other electronic network activity information:** browsing history, search history or website interaction.
- **Geolocation data:** physical location or movements.
- **Sensory data:** audio, electronic, visual, thermal, olfactory, or similar information.
- **Employment information:** current or past job history or performance evaluations.
- **Profiles or inferences:** profiles reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.

Categories of Sources from Which Personal Information is Collected

The relevant categories of sources of personal information that Gurstel *may* collect about California residents includes, but is not limited to, the following sources:

- **Client Records:** paper and electronic records containing personal information, such as name, signature, Social Security number, physical characteristics or description.

- **Third Party Service Providers:** paper and electronic records containing personal, employment and commercial information.
- **Local, state or federal governmental entities:** personal, employment or commercial information.

Purposes of Use

We *may* use the above categories of personal information as follows:

- To carry out a business purpose which may include the following: maintaining and administering any of your accounts serviced by us; processing transactions and payments; and possibly disclosing your information to third party service providers to carry out a business purpose;
- For authentication, identity verification, and fraud prevention and detection;
- To respond to or address your questions and investigate and resolve any issues;
- To personalize your experience using our websites and services;
- To improve and develop products and services, and for other research and analytics purposes;
- To respond to authorized regulatory, compliance and legal process; or
- To protect and defend our rights and interests and those of third parties, including in pursuit of or defense of litigation and other claims on behalf of or against us or our clients.

Not covered by this Notice

This Notice does not address or apply to any of the nonpublic information that we collect about consumers, pursuant to an exemption under CCPA Section 1798.145.

For more details and information about the personal information we collect and how we collect, use and disclose such personal information (as defined by the CCPA) and your rights regarding such personal information, please call us, toll-free, at 877-344-4002 or send correspondence to 9320 East Raintree Drive, Scottsdale, AZ 85260.

Policy Updated August 3, 2020