

California Consumer Privacy Rights Notice

Effective: January 1, 2020

This California Consumer Privacy Rights Notice ("Notice") sets forth Pinch AI's disclosure obligations under California law, including the California Consumer Privacy Act of 2018 ("CCPA") and California Civil Code section 1798.83. This Notice provides additional details regarding the information defined as 'personal information' under applicable California law and related to a California resident or household ("Consumers" and "You") further referred to as "Personal Information."

Personal Information Collected and Disclosed:

Pinch AI collects uses and/or discloses Personal Information as follows:

Personal Information Collected, Used and/or Disclosed for Business Purpose in Preceding 12 Months					
CCPA Category	Collected?	Source of Collection	Commercial Purpose	Shared with 3 rd Parties?	Purpose of 3 rd Party Disclosure
Category A Identifiers & B Personal Information					
• Name/Alias	YES	YOU	• Pinch AI service and marketing communications	N/A	N/A
• Email	YES	YOU	• Pinch AI service or marketing Communications	N/A	N/A
• Address	YES	YOU	• Pinch AI service or marketing Communications	N/A	N/A
• Cell or Telephone #	YES	YOU	• Pinch AI service or Marketing Communications	N/A	N/A
• Unique/Online ID (cookies)	YES	YOU/DEVICE	• Analytics	Data Processor; Analytics *opt-out available	Analytics
• IP Address	YES	DEVICE	• Debugging • Analytics	Data Processor; Analytics *opt-out available	Analytics
• Account Name/Credentials	YES	YOU	• Social Media Sharing (opt-in)	N/A	N/A
• Social Security #	NO	N/A	N/A	N/A	N/A
• Driver's License#	NO	N/A	N/A	N/A	N/A
• Passport #	NO	N/A	N/A	N/A	N/A
• Credit or Debit Card # /ACH	YES	YOU	Billing	N/A	N/A
• Other: Medical/Financial/Health	NO	N/A	N/A	N/A	N/A

Category C: Protected Characteristics	NO	N/A	N/A	N/A	N/A
Category D: Commercial Information	NO	N/A	N/A	N/A	N/A
• Personal Property Records					
• Products/Services Purchased- Obtained-Considered	NO	N/A	N/A	N/A	N/A
• Purchasing history/tendencies	NO	N/A	N/A	N/A	N/A
Category E: Biometric Information	NO	N/A	N/A	N/A	N/A
Category F: Internet/Network Activity	YES	YOU; Device	Analytics	Data Processor; Analytics	Analytics
• Browsing/search history					
• Interaction with site/advertisement					
Category G: Geolocation data	NO	N/A	N/A	N/A	N/A
Category H:	NO	N/A	N/A	N/A	N/A
• Audio					
• Electronic	NO	N/A	N/A	N/A	N/A
• Visual	NO	N/A	N/A	N/A	N/A
• Thermal	NO	N/A	N/A	N/A	N/A
• Olfactory	NO	N/A	N/A	N/A	N/A
• Other Similar	NO	N/A	N/A	N/A	N/A
Category L: Professional/Employment- Related	Yes	You	Consideration for potential job match	Potential hiring managers	Job placement
Category J: Educational Information	NO	N/A	N/A	N/A	N/A
Category K: Inferences from Data Collected					
• Preferences	NO	N/A	N/A	N/A	N/A
• Characteristics	NO	N/A	N/A	N/A	N/A
• Psychological Trends	NO	N/A	N/A	N/A	N/A
• Predispositions	NO	N/A	N/A	N/A	N/A
• Behavior	NO	N/A	N/A	N/A	N/A
• Attitudes	NO	N/A	N/A	N/A	N/A
• Intelligence/Abilities/Aptitudes	NO	N/A	N/A	N/A	N/A

Other Potential Third Party Disclosures: Personal Information may also be disclosed to third parties to serve our legitimate business interests as follows: (1) as required by law, such as to comply with a subpoena, or similar legal process, (2) as part of a merger, acquisition, bankruptcy or other transaction in which a third party assumes control of all or part of the business, (3) to investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies as required by law; (4) enforce our agreements with you, and/or (5) investigate and defend ourselves against any third-party claims or allegations.

Sale of Personal Information

Pinch AI does not sell and will not sell your Personal Information.

Your Consumer Rights under CCPA.

California Consumers may contact Pinch AI through their account, by email at info@pinch.ai with "California Privacy Rights" in the subject matter line or by mail to Pinch AI, 11766 Wilshire Blvd. Suite 400 Los Angeles, California 90025, Attention: "California Privacy Rights".

A. Request Pinch AI Disclose At No Charge:

- categories of Personal Information collected, used, and/or disclosed about you;
- categories of sources from which Personal Information is collected
- business and/or commercial purposes for collecting and disclosing your Personal Information;
- categories of third parties with whom your Personal Information has been disclosed/shared; and
- the specific pieces of Personal Information collected about you.

B. Request Pinch AI to Delete At No Charge:

Except as exempted pursuant to CCPA 1798.105, to request Pinch AI to delete Personal Information.

Consumer Request Limitations

Please note that the rights set forth in Section 3 are not absolute and in certain cases are subject to conditions or limitations as specified in the CCPA, including, but not limited to:

- Pinch AI is obligated to disclose/delete only upon a **verifiable** Consumer request from the consumer or an authorized agent acting on behalf of Consumer.
- Consumers may only make a personal information request twice in a 12-month period.
- Deletion is not required because it is necessary for Pinch AI to maintain the Personal Information to fulfill the purposes enumerated in CCPA Section 1798.105

Pinch AI will confirm and respond to all requests within the timeframe required under the CCPA. In responding to any request to disclose/delete, Pinch AI shall maintain a record of the requests as required under the CCPA.

Non-Discrimination Policy

You have the right not to receive discriminatory treatment for exercising any rights conferred by the CCPA. Pinch AI shall not discriminate against a consumer for exercising any rights under the CCPA, including, but not limited to, (a) denying goods or services, (b) charging different prices or rates (including discounts/penalties) that is not directly related to the value provided to Pinch AI for the Personal Information, or (c) suggesting Consumer will receive a different rate/price or different level of quality of goods/services

You're California Privacy Rights under California Civil Code Section 1798.83 & Business and Professions Code Section 22581

California law permits Consumers to request and obtain from once a year, free of charge, certain information about their Personally Identifiable Information ("PII") (as defined by California law) disclosed to third parties for direct marketing purposes in the preceding calendar year (if any). If applicable, this information would include a list of the categories of PII that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding calendar year.

In addition, a business subject to California Business and Professions Code Section 22581 must allow California residents under age 18 who are registered users of online sites, services or applications to request and obtain removal of content or information they have publicly posted. Your request should include a detailed description of the specific content or information to be removed. Please be aware that your request does not guarantee complete or comprehensive removal of content or information posted online and that the law may not permit or require removal in certain circumstances.

Contact Us

Additional detail regarding our collection, use and disclosure of Personal Information, as well as general opt-out rights and other privacy disclosures, is set forth in our general Privacy Policy.

If you have any questions regarding your Personal Information or about our privacy practices, please contact us at

Pinch AI, Inc.
Attention: California Privacy Rights
11766 Wilshire Blvd. Suite 400
Los Angeles, California 90025

This Notice was last updated: January 1, 2020