



CROWD STREET CALIFORNIA RESIDENT PRIVACY NOTICE

This California Resident Privacy Notice supplements the information and disclosures contained in Crowd Street's [Privacy Policy](#). It applies to individuals residing in California who have not yet registered for an account with Crowd Street and from whom we collect Personal Information as a business under the CCPA.

Personal Information Collection, Disclosure, and Sale

For the purposes of this notice, "**Personal Information**" means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household, or as otherwise defined by the California Consumer Privacy Act of 2018 (California Civil Code §§ 1798.100 to 1798.199) and its implementing regulations, as amended or superseded from time to time ("**CCPA**").

Personal Information does not include information that is:

- Lawfully made available from government records.
- Deidentified or aggregated.
- Otherwise excluded from the scope of the CCPA, for example, information that is subject to the Gramm-Leach-Bliley Act ("**GLBA**").

The chart below provides the categories of Personal Information (as defined by the CCPA) Crowd Street has collected, disclosed for a business purpose, or sold in the preceding twelve months since this notice was last updated. The examples of Personal Information provided for each category reflect each category's statutory definition and may not reflect all of the specific types of Personal Information associated with each category. Note that the terms "sale," "sell," and "sold" under the CCPA are defined very broadly to include the sharing of Personal Information with advertisers. We do not share Personal Information in exchange for money.

Category	We Collect	We Disclose	We Sell
A. Identifiers <i>Examples:</i> Name, alias, postal address, unique personal identifier, online identifier, internet protocol (IP) address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.	Yes	Yes	Yes, we may share this information with advertisers.
B. Categories of Personal Information in Cal. Civ. Code Section 1798.80(e) <i>Examples:</i> 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.	Yes	No	No
C. Characteristics of Protected Classifications under California or Federal Law <i>Examples:</i> Race or color, ancestry or national origin, religion or creed, age (over 40), mental or physical disability, sex (including gender and pregnancy, childbirth, breastfeeding or related medical conditions), sexual orientation, gender identity or expression, medical condition, genetic information, marital status, military and veteran status.	No	No	No

D. Commercial Information <i>Examples:</i> Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	No	No	No
E. Biometric Information <i>Examples:</i> Physiological, biological, or behavioral characteristics, including DNA, that can be used, singly or in combination with each other or with other identifying data, to establish individual identity, such as imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.	No	No	No
F. Internet or Other Electronic Network Activity Information <i>Examples:</i> Browsing history, search history, and information regarding a consumer's interaction with an internet website, application or advertisement.	Yes	Yes	Yes, we may share this information with advertisers.
G. Geolocation Data <i>Example:</i> Precise physical location, general location information.	Yes (we only collect general location information)	Yes	Yes, we may share this information with advertisers.
H. Sensory Information <i>Examples:</i> Audio, electronic, visual, thermal, olfactory, or similar information.	No	No	No
I. Professional or Employment-Related Information <i>Examples:</i> Job application or resume information, past and current job history, and job performance information.	No	No	No
J. Non-Public Education Information (as defined in 20 U.S.C. 1232g; 34 C.F.R. Part 99) <i>Examples:</i> Records that are directly related to a student maintained by an educational agency or institution or by a party acting for the agency or institution.	No	No	No
K. Inferences Drawn from Personal Information <i>Examples:</i> Consumer profiles reflecting a consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Yes	No	No

Use of Personal Information

We collect, use, and disclose your Personal Information in accordance with the specific business and commercial purposes below:

- 1. Providing Services:** Providing our services.
- 2. Marketing:** Marketing purposes, such as developing and providing promotional and advertising materials that may be useful, relevant, valuable or otherwise of interest to you.
- 3. Personalization:** Personalizing your experience on our services, such as presenting tailored content.
- 4. De-Identification and Aggregation:** Deidentifying and aggregating information collected through our services and using it for lawful purposes.
- 5. Safety Issues:** Responding to trust and safety issues that may arise.

6. **Compliance:** For compliance purposes, including enforcing our Terms of Use or other legal rights, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency.
7. **Auditing Interactions:** Auditing related to your interaction with our services and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with other standards.
8. **Fraud and Incident Prevention:** Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
9. **Debugging:** Debugging to identify and repair errors that impair existing intended functionality.
10. **Transient Use:** Short-term, transient use.
11. **Contracting Vendors:** Contracting with vendors and service providers to perform services on our behalf or on their behalf, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytics services, or providing similar services on behalf of the business or service provider.
12. **Research:** Undertaking internal research for technological development and demonstration.
13. **Improving Our Services:** Undertaking activities to verify or maintain the quality or safety of our services, and to improve, upgrade, or enhance our services.
14. **Enabling Transactions:** Otherwise enabling or effecting, directly or indirectly, a commercial transaction.
15. **Notified Purpose:** For other purposes for which we provide specific notice at the time the information is collected.

Collection of Personal Information

In the preceding twelve months since this notice was last updated, we have collected Personal Information from the following categories of sources:

1. **You/Your Devices:** You or your devices directly.
2. **Affiliates.**
3. **Advertising Networks.**
4. **Analytics Providers.**
5. **OS/Platform Provider:** Operating systems and platforms.

Disclosure of Personal Information

In the preceding twelve months since this notice was last updated, we disclosed Personal Information to the following categories of third parties:

1. **Advertising Providers:** Advertising technology companies, such as advertising networks.
 - Personal Information we share: Categories A, F, and G
2. **Analytics Providers.**
 - Personal Information we share: Categories A, F, and G
3. **Affiliates.**
 - Personal Information we share: Categories A, F, and G
4. **Vendors:** Vendors and service providers.
 - Personal Information we share: Categories A, F, and G
5. **Third Parties as Legally Required:** Third parties as required by law and similar disclosures.
 - Personal Information we share: Categories A, F, and G
6. **Third Parties in Merger/Acquisition:** Third parties in connection with a merger, sale, or asset transfer.
 - Personal Information we share: Categories A, F, and G



CROWD STREET

Your California Privacy Rights

If you are a California resident, you may exercise the following rights:

Right to Know and Access. You may submit a verifiable request for information regarding the: (1) categories of Personal Information collected, sold, or disclosed by us; (2) purposes for which categories of Personal Information are collected or sold by us; (3) categories of sources from which we collect Personal Information; (4) categories of third parties with whom we disclosed or sold Personal Information; and (5) specific pieces of Personal Information we have collected about you during the past twelve months.

Right to Delete. Subject to certain exceptions, you may submit a verifiable request that we delete Personal Information about you that we have collected from you.

Verification. Requests for access to or deletion of Personal Information are subject to our ability to reasonably verify your identity in light of the information requested and pursuant to relevant CCPA requirements, limitations, and regulations.

Right to Opt-Out. The CCPA defines "sale" very broadly to cover common industry practices, including providing you with a customized experience on our websites and apps. In some circumstances, you may opt-out of the sharing activities that meet the CCPA's definition of "sale." Email us at ccpa-inquiries@crowdstreet.com to opt-out of the sale of your Personal Information.

Right to Equal Service and Price. You have the right not to receive discriminatory treatment for the exercise of your CCPA privacy rights, subject to certain limitations.

Shine the Light. We do not rent, sell, or share Personal Information with non-affiliated companies for their direct marketing uses as contemplated by California's "Shine the Light" law (Civil Code § 1798.83), unless we have your permission.

Submit Requests. To exercise your rights under the CCPA, please use the links above, call our toll-free number (888) 432-7693, send an email to ccpa-inquiries@crowdstreet.com, or visit our website (<https://www.crowdstreet.com>).

Authorizing an Agent. If you are acting as an authorized agent to make a request to know, delete, or opt out on behalf of a California resident, send an email to ccpa-inquiries@crowdstreet.com and attach a written authorization signed by the resident.

Do Not Track

There is no accepted standard on how to respond to Do Not Track signals, and we do not respond to such signals.

Contact Information

If you have any questions, comments, or concerns about this notice or our processing activities please email us at ccpa-inquiries@crowdstreet.com or write to us at: CrowdStreet HQ, 10 East 40th Street, Suite 1020, New York, NY 10016.