

# A to Z Technology Privacy Policy by State

**Last updated March 23, 2024**

## State-Specific Privacy Information

---

This Statement is designed to be consistent with California, Colorado, Connecticut, Utah and Virginia privacy laws. This Statement uses certain terms that have the meanings given to them by the California Consumer Privacy Act (CCPA), as amended, unless otherwise specified.

### 1. Collection and Use

#### a. Collection

During the 12-month period prior to the effective date of this Statement, we may have collected the following categories of personal information, including sensitive personal information, about you:

- **Identifiers:** identifiers such as a real name, alias, postal address, unique personal identifier (such as customer number, unique pseudonym, or user alias), email address, account name, Social Security number, driver's license number, passport number, and other similar identifiers, physical characteristics or description, state identification card number, and signature
- **Identifiers (Online):** a device identifier; cookies, beacons, pixel tags, mobile ad identifiers and similar technology; other forms of persistent or probabilistic identifiers, and Internet Protocol address
- **Other Financial, Medical, and Health Information:** bank account number, credit card number, debit card number, insurance policy number, and other financial information, medical information, and health insurance information
- **Information Related to Characteristics Protected Under California or Federal Law:** characteristics of protected classifications under California or federal law, such as race, color, national origin, religion, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, medical condition, ancestry, genetic information, disability, citizenship status, and military and veteran status
- **Commercial Information:** including records of personal property, products or services purchased, obtained, or considered, and other purchasing or consuming histories or tendencies
- **Biometrics:** biometric information such as a fingerprint provided along with a product return if required by local law
- **Internet and Other Electronic Network Activity Information:** including, but not limited to, browsing history, search history, and information regarding your interaction with websites, applications or advertisements
- **Geolocation Data**
- **Sensory Information:** Audio, electronic, visual, thermal, and similar information
- **Professional or Employment-Related Information**
- **Education Information**

- **Profile Inferences:** inferences drawn from any of the information identified above to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and/or aptitude

b. Sources of collection

We collected personal information about you from the following sources:

- You
- A to Z Technology
- Device(s) You Used
- Service Providers

c. Purposes for collection/use

We collected and used personal information about you for the following purposes:

- Performing services you have purchased from or contracted for with us, including maintaining or servicing accounts (e.g., your My A to Z® account), as well as providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, providing analytics services, or providing similar services
- Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance
- Detecting and responding to security incidents, protecting against and responding to malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity
- Short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of your interactions with our digital properties
- Debugging to identify and repair errors that impair existing intended functionality
- Undertaking internal research for technological development and demonstration
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us
- Displaying advertisements intended for you based on personal information, related to your activities over time and across nonaffiliated websites or online applications, used to predict your preferences or interests (targeted advertising)
- Customizing your experience on our digital properties
- Processing liability claims
- Complying with and enforcing applicable legal requirements, relevant industry standards and our policies

## 2. Disclosures

a. We may have disclosed the following categories of personal information for a business purpose:

- Identifiers
- Identifiers (Online)
- Other Financial, Medical and Health Information
- Information Related to Characteristics Protected Under California or Federal Law
- Commercial Information
- Biometrics
- Internet and Other Electronic Network Activity Information
- Geolocation Data

- Sensory Information
- Professional or Employment-Related Information
- Education Information
- Profile Inferences

b. We may share personal information about you for cross-context behavioral advertising — seeking to place ads to you on others’ digital properties based, at least in part, on personal information obtained from your activity on others’ digital properties.

c. We may have sold (as defined under California, Colorado and Connecticut laws) the following categories of personal information:

- Identifiers (online) associated with a device used to interact with our digital properties or advertisements (such as a device identifier; cookies, beacons, pixel tags, mobile ad identifiers and similar technology)
- Internet and other electronic network activity information associated with a device used to interact with Digital Properties or advertisements
- Profile Inferences (solely as sale is defined under California rules)

d. We do not sell the personal information of consumers under the age of 16 if we have actual knowledge of the individual’s age.

e. We do not sell personal information as the term is traditionally understood or as defined under Virginia and Utah law. For example, we do not exchange for money personal information to data brokers or third parties for their marketing purposes independent of us.

f. **Sensitive Personal Information:** We do not share sensitive personal information for cross-context behavioral advertising. We do not sell sensitive personal information.

g. We may have disclosed personal information about you with the following categories of third parties:

- Our affiliates
- Our joint marketing partners
- Our business partners
- Social media networks
- Third-party marketing partners
- Government entities, including law enforcement

Information we disclose to third parties:

	<b>3rd Party Categories</b>					
<b>Personal Information Categories</b>	<b>Our Affiliates</b>	<b>Our Joint Marketing Partners</b>	<b>Our Business Partners</b>	<b>Social Media Networks</b>	<b>Third-party Marketing Partners</b>	<b>Government Entities, Including Law Enforcement-See Disclosure</b>
Identifiers	Yes	Yes	Yes	Yes	Yes	Yes
Identifiers (Online)	Yes	No	No	No	Yes	Yes
Other Financial, Medical and Health Information	No	No	No	No	No	Yes
Information Related to Characteristics Protected Under California or Federal Law	No	No	No	No	No	Yes

	3rd Party Categories					
Personal Information Categories	Our Affiliates	Our Joint Marketing Partners	Our Business Partners	Social Media Networks	Third-party Marketing Partners	Government Entities, Including Law Enforcement See Disclosure
Commercial Information	Yes	Yes	Yes	No	No	Yes
Biometrics	No	No	No	No	No	Yes
Internet and Other Electronic Network Activity Information	Yes	No	No	No	Yes	Yes
Geolocation Data	No	No	No	No	No	Yes
Sensory Information	No	No	No	No	No	Yes

	3rd Party Categories					
Personal Information Categories	Our Affiliates	Our Joint Marketing Partners	Our Business Partners	Social Media Networks	Third-party Marketing Partners	Government Entities, Including Law Enforcement See Disclosure
Professional or Employment Related Information	No	No	No	No	No	Yes
Education Information	No	No	No	No	No	Yes
Profile Inferences	Yes	No	No	No	No	Yes

Please note: A to Z Technology shares Personal Information with government entities, including law enforcement, only in the following circumstances: (1) when required to do so as a matter of law; (2) to assist in the investigation of a potential crime impacting A to Z Technology, Inc., its employees, its customers, or the communities we serve; or (3) when required in response to legal process (e.g., subpoena, search warrant).

### 3. Retention — California Residents

A to Z Technology has in place a records-retention schedule reflecting our intended retention periods for certain types of information. The following reflects the longest applicable intended retention period by personal-information category for information related to California consumers acquired on or after January 1, 2023. Once the intended retention period has passed, subject information is to be deleted or modified such that it is no longer personal information.

Personal Information Categories	Intended Retention Period
Biometrics	Up to 10 years after last activity, subject to contractual obligations
Commercial Information	10 years after expiration of contractual obligations
Education Information	10 Years after termination of employment
Geolocation Data	Up to 3 Years
Identifiers	Up to 10 years after last activity, subject to contractual obligations
Identifiers (Online)	Up to 3 years

Personal Information Categories	Intended Retention Period
Information Related to Characteristics Protected Under California or Federal Law	Up to 3 years
Internet and Other Electronic Network Activity Information	Up to 3 years
Other Financial, Medical and Health Information	Up to 10 years after last activity, subject to contractual obligations
Professional or Employment Related Information	10 Years after termination of employment
Profile Inferences	Up to 3 years
Sensory Information	Up to 3 years



There are a number of reasons personal information may be retained longer than the intended retention period. For example, deletion or modification does not happen immediately after a retention period has passed and instead executes periodically, no less frequently than annually. Additionally, some information systems or information may be placed on legal holds due to potential litigation or regulatory review and information, therefore, is not deleted or modified.

#### 4. Consumer Privacy Rights

You have certain choices regarding our use and disclosure of personal information about you, as described below.

- **Access:** You have the right to request, twice in a 12-month period, that we disclose to you the personal information related to you we have collected during the past 12 months. This may include:
  - The categories and specific pieces of personal information we have collected about you
  - The categories of sources from which we collected the personal information
  - The business or commercial purpose for which we collected or sold the personal information
  - The categories of third parties with whom we shared the personal information
  - The categories of personal information about you that we sold or disclosed for a business purpose, and the categories of third parties to whom we sold or disclosed that information for a business purpose
- **Correction:** You have the right to request that we correct certain personal information we have collected, taking into account the nature of the personal information and the purposes of the processing of the personal information. If you make a correction request, we may correct or instead delete information as allowed by law. Exceptions apply.
- **Deletion:** You have the right to request that we delete certain personal information we have collected from you. Exceptions apply.
- **Opt-Out of Sale:** You have the right to opt-out of the sale of your personal information.

#### 5. How to Submit a Request

- Submit an [access request](#), or call us at 1-833-935 ATOZ (1-833-935-2869).
  - The report you receive containing personal information we have on file will provide instructions on how to pursue correction of applicable information.
- Submit a [deletion request](#), or call us at 1-833-935 ATOZ (1-833-935-2869).

More information on opting out of the sale of your personal information, including through enabling Global Privacy Controls, is available on our [Do Not Sell/Share](#) page.

#### **California Residents**

- **Limit the Use or Disclosure of Sensitive Personal Information.** You have the right to request that we limit our use or disclosure of Sensitive Personal Information (as defined by California law) about you to certain uses authorized by the CCPA. We do not disclose Sensitive Personal Information beyond such authorizations. See our [Limit the use of My Sensitive Personal Information page](#) for more information.
- **Do Not Share My Personal Information.** You have the right to opt out of our sharing of personal information for cross-context behavioral advertising. See our [Do Not Sell/Share](#) page for more information on how to exercise this right.
- **Shine the Light Request:** You also may have the right to request that we provide you with (a) a list of certain categories of personal information we have disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year and (b) the identity of those third parties. To submit a Shine the Light Request, email us at [privacy@atoztech.co](mailto:privacy@atoztech.co).

### Colorado Residents

- **Opt Out of Targeted Advertising:** You have the right to opt out of “Targeted Advertising.” See our [Targeted Advertising Opt Out](#) page for more information on how to exercise this right.
- **Appeal a Refusal to Take Action:** Colorado law requires that we establish a process for a consumer to appeal our refusal to take action on certain requests. You may access that process on our [Appeals information](#) page. If you are not satisfied with the outcome of that process, you may [contact the Colorado Attorney General](#) to submit a complaint.
- **Other Options not Relevant:** We do not use your data for the purpose of profiling to make decisions that would have legal or similarly significant effects on you. We do not knowingly process “sensitive data” concerning Colorado residents, as defined under Colorado law, unless required as a matter of law.

### Connecticut Residents

- **Opt Out of Targeted Advertising:** You have the right to opt out of “Targeted Advertising.” See our [Targeted Advertising Opt Out](#) page for more information on how to exercise this right.
- **Appeal a Refusal to Take Action:** Connecticut law requires that we establish a process for a consumer to appeal our refusal to take action on certain requests. You may access that process on our [Appeals information](#) page. If you are not satisfied with the outcome of that process, you may [contact the Connecticut Attorney General](#) to submit a complaint.

### Utah Residents

- **Opt Out of Targeted Advertising:** You have the right to opt out of “Targeted Advertising.” See our [Targeted Advertising Opt Out](#) page for more information on how to exercise this right.
- **Other Options not Relevant.** We do not sell personal information as “sale” is defined under Utah law.

### Virginia Residents

- **Opt Out of Targeted Advertising:** You have the right to opt out of “Targeted Advertising.” See our [Targeted Advertising Opt Out](#) page for more information on how to exercise this right.
- **Appeal a Refusal to Take Action:** Virginia law requires that we establish a process for a consumer to appeal our refusal to take action on certain requests. You may access that process on our [Appeals information](#) page. If you are not satisfied with the outcome of that process, you may [contact the Virginia Attorney General](#) to submit a complaint.

- **Other Options not Relevant.** We do not sell personal information as “sale” is defined under Virginia law. We do not knowingly process “sensitive data” concerning Virginia residents, as defined under Virginia law, unless required as a matter of law.

### **Verifying Requests.**

To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your personal information or complying with your request. If you have an account with us, we may verify your identity by requiring you to sign in to your account. If you request access to or deletion of your personal information and do not sign in to an account with us, we require you to provide the following information: name, email address, phone number, and postal address. In addition, if you do not have an account and you ask us to provide you with specific pieces of personal information, we reserve the option to require you to sign a declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request. If you designate an authorized agent to make a request on your behalf for which verification is required, we may (1) require you to provide the authorized agent written permission to do so, and (2) require you to verify your own identity directly with us (as described above).

## **6. Notice About the My A to Z Program**

The My A to Z® Program (the “Program”) is A to Z Technology’s loyalty program that offers Program members (“Members”) certain benefits. To participate in the Program, you must provide your full name, email address, postal address, and phone number. The following categories of personal information are implicated based on your participation in the Program:

- Commercial information, including records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
- Internet and Other Electronic Network Activity Information: including, but not limited to, browsing history, search history, and information regarding your interaction with websites, applications, or advertisements
- Identifiers (Online): a device identifier; cookies, beacons, pixel tags, mobile ad identifiers and similar technology; other forms of persistent or probabilistic identifiers, and Internet Protocol address
- Inferences drawn from any of the above (e.g., preferences or characteristics)

We use personal information to identify you as a member of the program and provide you with relevant messaging, benefits, and incentives. These benefits and incentives are reasonably related to the value of the data you provide.

Subject to certain restrictions, Members who use their My A to Z Credit Card or My A to Z Visa® Card on eligible transactions may receive points on qualifying purchases. My A to Z Credit Cardmembers may redeem points toward the issuance of reward certificates after receiving a specified number of points, or they may also use points with certain A to Z Technology Partners. Members who do not have a My A to Z Credit Card may be eligible to receive promotional certificates. Members may receive additional benefits identified by A to Z Technology, as updated from time to time, with a current summary available by visiting [A to Z Technology Terms of Service](#).

Member purchases of certain products and services may be eligible for discounts or reduced member pricing at A to Z Tech Co retail stores, on AtoZTech.co, and the A to Z mobile app (“Member Pricing”). Member Pricing will be limited-time offers and subject to offer limitations communicated by us. Specific

details on earning points, rewards, and Member Pricing can be found at [A to Z Technology Terms of Service](#).

You may enroll in the Program on our website, through our mobile app, or at a A to Z Technology retail location. You may cancel your Member Account at any time by calling 1-833-935 ATOZ (1-833-935-2869). See the [A to Z Technology Terms of Service](#) for additional information regarding membership cancellation.

## 7. Additional Information

If you choose to exercise any of your rights, you have the right not to receive, and will not receive, discriminatory treatment by us. To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request. Employees and contractors are provided notice via different statements.

This Statement is available in alternative formats upon request. Please contact [privacy@atoztech.co](mailto:privacy@atoztech.co) or 1-833-935 ATOZ (1-833-935-2869) to request this Statement in an alternative format.