BrightTALK Privacy Notice for California Residents

TO EXERCISE YOUR CCPA RIGHTS:

To exercise your access, data portability, deletion, correction, or “Opt Out of the Sale or Sharing of My Personal Information” rights, please submit your request using one of the following options:

- Complete our web form: California CCPA Rights Request Form
- Email us at: privacy@brighttalk.com
- Call us at: (617) 431-9200

California Consumers can exercise their non-discrimination rights be emailing privacy@brightTALK.com.

BrightTALK does not perform automated decision making as it relates to its member/subscriber business processes.

Last Updated: December 21, 2022

CALIFORNIA PRIVACY NOTICE OVERVIEW:

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS (“Privacy Notice”) supplements the information contained in BrightTALK’s Privacy Policy (collectively, “we,” “us,” or “our”), as well as any other privacy notices we may provide, and applies solely to visitors, subscribers, client users, prospects and others who reside in the State of California (“Consumers” or “you”). We have adopted this Privacy Notice to comply with the California Consumer Privacy Act of 2018, as amended, and implementing regulations (“CCPA”) and other California privacy laws. This Privacy Notice includes the California Privacy Rights Act (“CPRA”), also known as Proposition 24, which was introduced as a ballot measure and was approved by California voters on November 3, 2020.

Any terms defined in the CCPA, other California privacy laws, or in our Privacy Policy have the same meaning when used in this Privacy Notice.
A. Information We Collect

We collect information that identifies, relates to, describes, and/or is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a Consumer or Household ("Personal Information").

Personal Information does not include: (i) publicly available information or lawfully obtained, truthful information that is a matter of public concern ("Publicly available" means: Information that is lawfully made available from federal, state, or local government records or such information that a business has a reasonable basis to believe is lawfully made available to the general public by the Consumers or from widely distributed media, or by the Consumer; or information made available by a person to whom the Consumer has disclosed the information if the Consumer has not restricted the Information to a specific audience); (ii) de-identified or aggregated Consumer information; and (iii) information excluded from the CCPA’s scope (including: (a) health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data, and (b) Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994).

We have collected the following categories of Personal Information from Consumers within the last twelve (12) months:

<table>
<thead>
<tr>
<th>Category</th>
<th>CCPA Examples</th>
<th>Collected</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. Identifiers.</td>
<td>A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.</td>
<td>YES</td>
</tr>
<tr>
<td>B. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</td>
<td>A 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. Some Personal Information included in this category may overlap with other categories.</td>
<td>YES</td>
</tr>
<tr>
<td>C. Protected classification characteristics under California or federal law.</td>
<td>Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</td>
<td>YES</td>
</tr>
<tr>
<td>D. Commercial information.</td>
<td>Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</td>
<td>YES</td>
</tr>
<tr>
<td>E. Biometric information.</td>
<td>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.</td>
<td>NO</td>
</tr>
<tr>
<td>F. Internet or other similar network activity.</td>
<td>Browsing history, search history, information on a Consumer’s interaction with a website, application, or advertisement.</td>
<td>YES</td>
</tr>
<tr>
<td>G. Geolocation data.</td>
<td>Physical location or movements.</td>
<td>YES</td>
</tr>
<tr>
<td>H. Sensory data.</td>
<td>Audio, electronic, visual, thermal, olfactory, or similar information.</td>
<td>YES</td>
</tr>
<tr>
<td>I. Professional or employment-related information.</td>
<td>Current or past job history or performance evaluations.</td>
<td>YES</td>
</tr>
<tr>
<td>J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).</td>
<td>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.</td>
<td>NO</td>
</tr>
</tbody>
</table>
K. Inferences drawn from other Personal Information. Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. YES

L. Sensitive Personal Information

A Consumer's social security, driver's license, state identification card, or passport number; a Consumer's account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; a Consumer's precise geolocation; a Consumer's racial or ethnic origin, religious or philosophical beliefs, or union membership; the contents of a Consumer's mail, email and text messages, unless the business is the Intended recipient of the communication; a Consumer's genetic data; and the processing of biometric information for the purpose of uniquely identifying a Consumer; Personal Information collected and analyzed concerning a Consumer's health; or Personal Information collected and analyzed concerning a Consumer's sex life or sexual orientation. NO

We obtain the categories of Personal Information listed in the table above from the following categories of sources:

- **Directly from You.** For example, (i) if you visit our websites, respond to a survey, take a webinar, participate in a telephone interaction, fill out a registration form or otherwise agree to become a Member/Subscriber of BrightTALK (ii) if you fill out a form or communicate with us through one of our websites to receive information about our business to business services or to schedule a demonstration of our online, media, marketing, or data services products or programs, and (iii) if you expressed interest in being contacted by us at a trade show in which we participated or hosted.

- **Directly from our Clients or their agents.** For example, from documents or files that our Clients provide to us including, but not limited to, suppression lists/do not call lists and IP addresses corresponding to individuals who have either opted-out of Client communications or who have visited Client’s websites, or related to the products or services our Clients are purchasing from us.

- **Indirectly from our Clients or their agents.** For example, through information we collect from our Clients in the course of providing services to them.

- **Directly and indirectly from activity on our websites.** For example, from observing your actions on our websites or through your submission of an online form requesting a demonstration or walkthrough for one of our products or services.

- **From Third Parties that contract with us or interact with us in connection with the services we perform.** For example, from (i) vendors and partners that help us to build contact lists, supplement or update your information in our database, or
confirm/verify our records and information are accurate and up to date, (ii) third parties that may contact you, on our behalf, to provide you relevant content and/or to become a member, or (iii) third parties (including, other B2B contact providers) that integrate their services with ours or provide us access to their services.

B. Use of Personal Information

We may use, sell, or disclose the Personal Information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided. For example, if you provide us or our Service Providers with Personal Information as part of a telephone interaction, via webinar participation, through completion and submission of an online registration form on a BrightTALK website, affiliate website, or vendor/partner website, or any other method or means of communication we will: (i) use that information to send you emails, newsletters, and other notices concerning our products or services, or news, that may be relevant to your professional interests, (ii) sell that information to our Clients so they may contact you with information about, and invitations for, products and services tailored to your professional interests and responsibilities, or (iii) communicate with you, advertise to you or invite you connect with us or with your peers and with providers of technologies, goods, and services that may be relevant to your professional interests.

- To provide, support, personalize, and develop our websites, products, and services.

- To create, maintain, customize, and secure your member account with us.

- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.

- To personalize your experience on our websites and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our websites, third-party sites, and via email or telephone (with your consent, where required by law).

- To help maintain the safety, security, and integrity of our websites, products and services, databases and other technology assets, and business.

- For testing, research, analysis, and product development, including to develop and improve our websites, products, and services.

- As necessary or appropriate to protect the rights, property or safety of us, our Clients or others.
• To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.

• As described to you when collecting your Personal Information or as otherwise set forth in the CCPA.

• To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us is among the assets transferred.

C. Sharing or Selling of Personal Information

BrightTALK may share or sell your Personal Information with Third Parties, including BrightTALK’s Clients.

The above is subject to your right to opt-out of the sales or sharing (see Personal Information Sales Opt-Out and Opt-In Rights) of your Personal Information.

1. Sharing or Selling Personal Information for a Business Purpose

In the preceding twelve (12) months, BrightTALK has disclosed the following categories of Personal Information for a business purpose:

• Category A: Identifiers.

• Category B: California Customer Records Personal Information categories.

• Category C: Protected classification characteristics under California or federal law.

• Category D: Commercial information.

• Category F: Internet or other similar network activity.

• Category G: Geolocation data.

• Category I: Professional or employment-related information.

• Category K: Inferences drawn from other Personal Information.

In the preceding twelve (12) months, we have disclosed your Personal Information with the following categories of third parties for a business purpose:

Third parties to whom you or your agents authorize us to disclose your Personal Information in connection with products or services we provide to you including:
• **Clients/Partners** – For the purposes outlined in our Privacy Policy including to provide you with personalized content, ads, and sales and marketing communications from us and our Partners (e.g., our clients that purchase our member contact information through lead generation, content syndication, branding, and other similar products and services) that are relevant to your professional interests as demonstrated by the content and services you chose to interact with on our network of websites.

2. **Notice of the Right to OPT OUT of the Sharing or Sale of Your Personal Information to Clients (Third Parties)**

The CCPA prohibits third parties who purchase the Personal Information we hold from reselling it unless you have an opportunity to opt-out of the sale or sharing of your Personal Information. In the preceding twelve (12) months, BrightTALK has sold the following categories, or certain components of the following categories, of Personal Information:

- Category A: Identifiers.
- Category B: California Customer Records Personal Information categories.
- Category C: Protected classification characteristics under California or federal law.
- Category D: Commercial Information.
- Category F: Internet or other similar network activity.
- Category G: Geolocation data.
- Category I: Professional or employment-related information.
- Category K: Inferences drawn from other Personal Information.

We sell your Personal Information to the following categories of third parties:

Businesses (including our Clients/Partners); and Third Parties to whom you or your agents authorize us to disclose your Personal Information in connection with products or services we provide to you.

**D. Sensitive Personal Information**

We do not use or discloses sensitive Personal Information for the above business purposes as defined under CCPA.

**E. Sell or Sharing of PI of Children**
We do not knowingly sell or share information of Consumers who are under 16. See Section 10 of our general BrightTALK Privacy Policy for additional details.

F. Your Rights and Choices

The CCPA provides Consumers with specific rights regarding their Personal Information. This section describes your CCPA rights and explains how to exercise those rights.

1. Access to Specific Information and Data Portability Rights

In addition to the information disclosed to you in this policy, you have the right to request that we disclose to you the specific pieces of Personal Information we collected about you over the past 12 months subject to verifying your request. You also have the right to request that such information is delivered in a format that may be transmitted to another entity upon your verified request.

Once we receive and confirm your verifiable Consumers request (see Exercising Access, Data Portability, and Deletion Rights), 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 or selling that Personal Information;
- The categories of third parties with whom we share that Personal Information;
- The specific pieces of Personal Information we collected about you (also called a data portability request); and
- If we sold or disclosed your Personal Information for a business purpose, two separate lists disclosing:
  - sales, identifying the Personal Information categories that each category of recipient purchased; and
  - disclosures for a business purpose, identifying the Personal Information categories that each category of recipient obtained.

2. Deletion Request Rights

You have the right to request that we delete any of your Personal Information that we collected from you and retained in our databases, subject to certain exceptions. Once we receive and confirm your verifiable Consumer request, we will delete your Personal Information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our Service Providers to:

1. Complete the transaction for which we 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.

2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.

3. Debug products to identify and repair errors that impair existing intended functionality.

4. Exercise free speech and ensure the right of another Consumer to exercise their free speech rights, or exercise another right provided for by law.

5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code §1546 seq.).

6. 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.

7. Enable solely internal uses that are reasonably aligned with Consumer expectations based on your relationship with us.

8. Comply with a legal obligation.

9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

3. Correction Request Rights

You have the right to request that we correct inaccurate Personal Information that we maintain, or which pertains to you.

4. Right to Non-Discrimination

You have the right not to receive discriminatory treatment by our business for the exercise of privacy rights conferred by the CCPA. We may choose in the future to offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your Personal Information’s value and contain written terms that describe the program’s material aspects.

5. Other California Rights

California’s “Shine the Light” law (Civil Code Section § 1798.83) permits users of our websites that are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To
make such a request, please send us an electronic message through our website or write us at privacy@brighttalk.com.

6. **Exercising the Right to Know, Access, Data Portability, Correction, and Deletion Rights**

To exercise the right to know, access, data portability, and deletion rights described above, please submit a verifiable Consumer request to us using one of the following options:

- Complete our web form - **California CCPA Rights Request Form**
- Email us at: privacy@brighttalk.com
- Call us at: (617) 431-9200

Only you or a person acting on your behalf who you authorize (a.k.a. an “Authorized Agent”), may make a verifiable Consumers request related to your Personal Information. We will use reasonable methods to verify your request or that of your Authorized Agent including, for example, comparing the email address you used to register on TechTarget or another affiliated third-party website.

- **Authorized Agents** – may be required to use the above web form to submit CA Consumers Requests on the behalf of California Consumers. Requests submitted via other methods may be directed to utilize the above web form. Authorized Agents must also submit proof of authorization by the Consumers which meets the requirements of the CCPA.

You may only make a verifiable Consumer request for certain information (required by section 1798.110 and 1798.115 of the CCPA) twice within a 12-month period. The verifiable Consumers request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.
- We 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. Making a verifiable Consumer request does not require you to create an account with us. We will only use Personal Information provided in a verifiable Consumer request to verify the requestor’s identity or authority to make the request.
7. Response Timing and Format

We endeavor to respond to a verifiable Consumer request within 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 the email address associated with 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 may only cover the 12-month period preceding the verifiable Consumer request’s receipt. The response we provide will also explain the reasons why we cannot comply with a request, if applicable. For data portability requests, we will endeavor to 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.

8. Personal Information Sales Opt-Out and Opt-In Rights

If you are sixteen (16) years of age or older, you have the right to direct us to not sell your Personal Information at any time (the “right to opt-out”). Our business, as a business-to-business (“B2B”) provider, is targeted to business professionals. Therefore, we do not collect, sell, or share the Personal Information of Consumers we know are less than sixteen (16) years of age. If we learn that we have inadvertently collected the Personal Information of someone under the age of 16, we will immediately terminate the associated account and delete any data in connection with such registration and the user’s activity.

Consumers who opt-in to Personal Information sales may opt-out of future sales at any time.

In order to provide you with our services, it is necessary for us to provide and personalize ads, content, and communications based on your use of websites, including with information regarding your interests and your online interactions.

If you request that we “do not sell” your Personal Information, as described in this Privacy Notice for California Residents (and our Privacy Policy), you will not be able to use any services we offer that require the continued use of the your business email address, such as maintaining your member account and providing you access to our free Premium Services. Accordingly, members who utilize the “Do Not Sell or Share My Personal Information” link on our websites will be presented with the option to delete their account with BrightTALK and their associated Personal Information. If you make this request, you will still be able to access all the information and content that we offer on our websites to
non-members. Further, you may register a new account with our websites at any time using a new corporate email address.

To exercise this right, you (or your authorized representative) may submit a request to us by utilizing our CCPA Rights Request Form available here.

G. Changes to Our Privacy Notice

We reserve the right to amend this Privacy Notice at our discretion and at any time. When we make changes to this Privacy Notice, we will notify you by email or through a notice on our website homepage, or by updating our Change Log below.

CHANGE LOG:

December 20, 2022 – Changes made to include the new requirements of CPRA.

The following sections were updated:

To Exercise Your Privacy Rights

California Privacy Notice Overview

Section A: Information We Collect

Section B: Use of Your Personal Information

Section C: Sharing or Selling of Personal Information

Section D: Sensitive Personal Information – Added

Section E: Selling or Sharing of PI of Children - Added

Section F: Your Rights and Choices

Section G: Changes to Our Privacy Notice

Section H: Contact Information and Accessibility

H. Contact Information and Accessibility

This Privacy Notice can be made available in alternate formats upon request. If you have any questions or comments about this Privacy Notice, our Privacy Policy, the ways in which we collect and use your Personal Information, your choices and rights regarding such use, or if you wish to exercise your rights under California law, please do not hesitate to contact us at:

Website: www.brighttalk.com
Email: privacy@brighttalk.com or DPO_TTGT@techtarget.com

Phone: (617) 431-9200

Postal Address:

BrightTALK, Inc.
275 Grove Street
Newton, MA 02466
Attn: Data Protection Officer