

Privacy Notice for California Residents

Last updated: June 8, 2020

Aspen Surgical understands the importance of your privacy and we take our responsibility to protect your information seriously. This **Privacy Notice for California Residents** (“Notice”) supplements the information in our [website privacy policy](#) and applies solely to “consumers” as defined by the California Consumer Privacy Act (“CCPA”). This Notice explains our collection, processing, and disclosure of “personal information” relating to California consumers, as required by the CCPA. Any terms defined in the CCPA have the same meaning when used in this Notice. Please read this Notice carefully before sharing information with us so you understand our practices regarding your information.

Personal Information We Collect and How We Collect It

As defined by the CCPA, “personal information” includes any information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California consumer, household, or device. Personal Information does not include:

- Publicly available information from government records;
- Deidentified or aggregated consumer information;
- Medical or protected health information covered by the HIPAA or the California Confidentiality of Medical Information Act; or
- Information collected as part of a clinical trial.

In the past 12 months, we have collected the following categories of personal information from California residents.

Category	Examples	Do We Collect?
Legally protected classification characteristics	Race, color, national origin, citizenship, religion, marital status, sex, sexual orientation, age (40 years or older), gender	No
Personal information categories in California’s Consumer Records statute	Name, address, telephone number, facility name, education, employment, employment history, signature	Yes
Identifiers	Name, postal address, IP address, other online identifier, email address, account number	Yes
Internet or similar network activity	Information relating to your interaction with our website or applications, browsing history, search history	Yes

Commercial information	Purchasing or consuming histories, records of personal property, products and services purchased	Yes
Geolocation information	Information regarding physical location, movement, and movement patterns	No
Biometric information	Physiological, biological, or behavioral characteristics, such as DNA sequence, finger prints, iris or retina scans,	No
Sensory information	Audio, voicemail	Yes
Professional or employment-related information	Prior employment history, performance information, resume or similar information	Yes, but only for job applicants
Non-public education information	Education records directly related to a student that are maintained by an educational institution pursuant to the Family Educational Rights and Privacy Act	No
Inferences from other personal information	Inferences drawn from the categories listed above to create a profile about an individual that reflects the individual's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes	No

Aspen Surgical collects these categories of personal information from the following sources:

- Direct collection:** We collect information directly from you when you choose to provide it to us by filling out forms on our website, registering to use any of our services, creating an account or completing the details of any profile using the services, reporting a problem with the services, signing up to receive emails or information from us, communicating with us, purchasing our services or products or otherwise engaging in transactions with us, attending an event or presentation, visiting our offices, or otherwise directly providing the information to us.
- Indirect and technology-based collection:** We also collect certain information from you indirectly when you visit, use, or navigate our website. Aspen Surgical collects certain identifiers (such as IP addresses) and internet and similar network activity (such as website usage data) from you indirectly using cookie, pixels, and passive tracking technologies, as described in our website privacy policy.
- Third-party collection:** From time-to-time, we may obtain invitee lists for events that we are co-hosting with other companies or in which we participate.

How We Use Your Personal Information

We use the personal information that you provide us, or that we collect about you, for the following business and commercial purposes:

- To present our website and its contents to you.
- To consider you for current or future employment opportunities and to process your employment application.
- To provide you with information, products or services that you request from us or that we are contracted to provide to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our website or any products or services we offer or provide through it.
- To fulfill any other purpose for which you provide it, such as subscribing you to an e-mail newsletter.
- To communicate with you regarding products you may have purchased from us.
- To allow you to participate in interactive features on our website, if any.
- To comply with applicable laws, regulations, and legal process.
- In any other way we may describe when you provide the information.
- To keep a record of our transactions and communications.
- As otherwise necessary or useful for us to conduct our business, provided the use is permitted by law. For example, analyzing audience and use patterns from the websites; storing information about your preferences and allowing us to direct or customize specific content to you; recognizing you when you return to our websites.
- To protect our rights, privacy, safety, operations, or property.
- For any other purposes with your consent.
- As otherwise described in our website privacy policy.

Disclosure and Sale of Personal Information

During the past 12 months, Aspen Surgical has disclosed the following categories of personal information for one or more of the business purposes set forth above:

Category of Personal Information	Category of Third Party / Business Purpose of Disclosure
Personal information categories in California’s Consumer Records statute	<ul style="list-style-type: none"> • IT and cloud/hosting service providers, such as our email provider, business application providers, hosting providers, managed services providers, and IT consultants • Event hosting and registration service providers • Financial institutions and payment processors • Governmental entities or other parties where in response to legally binding requests, such as to comply with a subpoena • Delivery or courier providers
Identifiers	<ul style="list-style-type: none"> • IT and cloud/hosting service providers, such as our customer relationship management platform provider,

	<ul style="list-style-type: none">business application providers, managed service providers, and IT consultants• Event hosting and registration service providers• Financial institutions and payment processors• Survey services provider• Governmental entities or other parties where in response to legally binding requests, such as to comply with a subpoena• Delivery or courier providers
Internet Activity	<ul style="list-style-type: none">• IT and cloud/hosting service providers.• Online analytics and advertising service providers
Commercial Information	<ul style="list-style-type: none">• With service providers that assist us with managing our customer relationships (including our hosted customer relationship management software provider), communications with customers and those who inquire about our business, contract fulfilment, and product support.
Sensory information	<ul style="list-style-type: none">• IT and cloud/hosting service providers, such as our email provider, business application providers, hosting providers, and telephone communication providers
Professional or employment-related information	<ul style="list-style-type: none">• Service providers necessary for processing employment applications, including those necessary for hosting applicant information, verifying applicant information, and conducting background or credit checks, as applicable

Aspen Surgical has not sold any categories of personal information to third parties in the past 12 months. Likewise, we do collect personal information regarding minors under 16 years of age and, accordingly, do not have actual knowledge of any sales of such information.

Please note that we may also use, disclose, or transfer your information in connection with the sale, merger, dissolution, restructuring, divestiture, or acquisition of our company or its assets.

Your Rights Under the CCPA

The CCPA provides California residents with the rights discussed below. For convenience, and as required by the CCPA, we explain how you can exercise those rights, to the extent they are applicable.

1. Right to Request Access Information. You have the right to request that we disclose certain information about our collection and use of your personal information during the past 12 months. Specifically, you may request that we disclose:

- The categories of personal information we collected about you;
- The categories of sources for the personal information we collected about you;

- The business and commercial purposes for collecting your personal information;
- The categories of third parties with whom we shared your personal information;
- The specific pieces of personal information we collected about you; and
- If we disclosed your personal information for a business purpose, the categories of personal information received by each category of third party.

2. Right to Data Portability. You have the right to request that we provide copies of the specific pieces of personal information we collected about you. If a verifiable consumer request is made, and subject to any exceptions or limitations under the CCPA, we will take steps to deliver the personal information to you either by mail or electronically. If we provide the information to you electronically, it will be in a portable and readily useable format, to the extent technically feasible. Note: consistent with the CCPA, we will not provide copies of your social security number, driver's license number, other government-issued identification number, financial account number, health or medical identification number, account password, or security questions or answers in response to a CCPA request.

3. Right to Request Deletion. You have the right to request that we delete personal information we collected from you, subject to any exceptions or limitations under the CCPA.

Exercising Your Rights

To exercise the rights described above, you—or someone authorized to act on your behalf—must submit a verifiable consumer request to us by calling us at 888-364-7004 or sending an email to customerservice@aspensurgical.com. Your request must allow us to reasonably verify that you are the individual regarding whom we collected the personal information and must describe the request with enough detail that we can understand and respond to it. Specifically, so we may verify your request, you must provide your name, address, phone number, email address, and the name of the organization, business, or facility at which you work (if applicable), as well as a description regarding the methods you believe you used to submit personal information to Aspen Surgical. To confirm that you are a resident of California, we may require you to provide proof of your residency, which could include a declaration signed under penalty of perjury. For requests made by an authorized representative, the representative will be required to provide the foregoing information together with proof of authorization, which may include an authorization form signed by the consumer. Depending on the nature of your request, we may ask for additional information in order to verify your identity. If you do not provide the requested information, we will not be able to respond to your request or provide you with the personal information requested. Please **do not** provide social security numbers, government identification numbers, payment card information, bank account information, or any similar information as part of your request.

You may only submit requests for access or data portability twice within any 12-month period. As indicated above, please be aware that the CCPA provides certain limitations and exception to the foregoing rights, which may result in us denying or limiting our response to your request.

The CCPA requires us to respond to a verifiable consumer request within 45 days, but permits us to extend that period by an additional 45 days, provided we notify you of the reason for the extension in writing. We



will notify you that we have received your request within 10 days of its receipt. In general, we will not charge a fee to respond to a verifiable request, unless it is excessive, repetitive, or unfounded.

Our Commitment Not to Discriminate

If a California consumer exercises the rights discussed above, consistent with the CCPA, we will not discriminate against that individual by denying goods or services, charging different prices or rates for goods or services, providing different levels or quality of goods or services, or suggesting that the resident will receive a different price, rate, or quality of goods or services.

Changes to this Notice

Please note that we may change this Notice from time to time. We will post change here and update the "Last Updated" date at the top of this document. Continued use of this website after any changes is deemed to be acceptance of those changes. Please check this Notice periodically for updates.

Our Contact Information

To contact us regarding this Notice, your rights under the CCPA, or to exercise those rights, please contact us using the information below.

Aspen Surgical Products, Inc.
Attn: Customer Service
Address: 6945 Southbelt Dr SE, Caledonia, MI 49316
Phone: 888-364-7004
Email: customerservice@aspensurgical.com