

PANICLE INC

CCPA PRIVACY NOTICE

Last Modified: February 21, 2025

This Panicle INC, a New Jersey corporation, supplemental privacy notice (the "**CCPA Notice**") applies to visitors, employees, users, applicants for employment, and independent contractors, and others who are California residents ("**consumers**", "**your**" or "**you**") and is issued pursuant to the California Consumer Privacy Act of 2018 ("**CCPA**"), as amended by the California Privacy Rights Act of 2020 effective January 1, 2023 ("**CPRA**") (together, the "**Statutes**") and other California laws governing privacy and general data collection and use. Any capitalized terms not otherwise defined herein but defined in the Statutes, have the meaning set forth in the Statutes. This CCPA Notice describes the uses of, and your rights pertaining to, California residents' Personal Information, which we collect directly or indirectly while providing our Services, or in connection with our collection and use of employee and business-to-business Personal Information.

This CCPA Notice is an integral part of and is integrated with our Privacy Notice, and capitalized terms not defined neither herein nor in the Statutes, shall have the same meaning set forth in our Privacy Notice.

DO NOT SELL OR SHARE MY PERSONAL INFORMATION – To jump to the section about your rights to prohibit our sale or sharing of your Personal Information, please click [here](#).

LIMIT USE AND DISCLOSURE OF SENSITIVE PERSONAL INFORMATION – To jump to the section about your rights to limit the use and disclosure of Sensitive Personal Information, please click [here](#).

PART I: A COMPREHENSIVE DESCRIPTION OF THE INFORMATION PRACTICES:

(A) CATEGORIES OF PERSONAL INFORMATION WE COLLECT

We collect Personal Information, defined under the Statutes as any information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household or device, all as detailed in the table below.

Personal Information further includes Sensitive Personal Information ("**SPI**") as detailed in the table below.

Personal Information does not include: Publicly available information that is lawfully made available from government records, that a consumer has otherwise made available to the public; De-identified or aggregated consumer information; Information excluded from the Statutes' scope, including but not limited to Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPPA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; 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 collected the following categories of Personal Information within the last twelve (12) months:

Category	Example	Collected
A. Identifiers	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.	Yes : real name, unique personal identifier, online identifier, IP address, email address.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	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.	Yes : name, telephone number, address, email address.

	Some personal information included in this category may overlap with other categories.	
C. Protected classification characteristics under California or federal law	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).	No
D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes : transactions conducted, however, no payment information (e.g., credit card number, bank account information such as checking, money market or savings account routing numbers, etc.).
E. Biometric information	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.	No

F. Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Yes: information on Customer interaction with our website or the Company Platform.
G. Geolocation data	Physical location, approximate location derived from IP address or movements.	Yes : approximate geolocation.
H. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.	No
I. Professional or employment-related information	Current or past job history or performance evaluations.	No; we do not have employees in California.
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))	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.	No
K. Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, pre-dispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No

L. Sensitive personal information	Government-issued identifying numbers; financial account details; genetic data; precise geolocation; race or ethnicity; religious or philosophical beliefs; union membership; contents of your mail, email, text messages (unless we are the intended recipient of the communication); biometric data; health data; sexual orientation or sex life.	No
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(B) CATEGORIES OF SOURCES OF PERSONAL INFORMATION

- Directly and indirectly from activity on our website and Company Platform : For example, directly from you when you inquire about our Services via our website, or indirectly, when we collect your usage data or browsing data automatically from measurement tools.
- Directly from you : For example, from forms you complete (such as the Data Subject Request), contact us or requesting a demonstration.
- From third-parties : For example, from vendors who assist us in performing services for consumers, advertising networks, internet service providers, data analytics providers, social networks, and data brokers. Further, our Customers will provide us with Recipient Contact Information and Recipient Behavior Data.
- Publicly accessible sources : Any publicly available information, such as information from the Internet.

(C) USE OF PERSONAL INFORMATION

We may use the Personal Information collected as identified above, for the following purposes: To fulfill or meet the reason you provided the Personal Information (support, respond to a query; monitor and improve our services; analyze which types of ads should be provided as part of the services; provide the services; marketing our services; analyzing our services and your use of the services and website; respond to law enforcement; or otherwise as detailed in our [Privacy Notice](#).

We will not collect additional categories of personal information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

(D) DISCLOSURES OF PERSONAL INFORMATION FOR A BUSINESS PURPOSE

We may disclose your Personal Information to a contractor or service provider for a business purpose. When we disclose Personal Information for a business purpose, we do so pursuant to a contract or agreement that describes the purpose of the disclosure and requires the recipient to both keep Personal Information confidential and not use it for any purpose except performance of the contract or agreement. We further restrict the contractor or service provider from selling or sharing your Personal Information. In the preceding twelve (12) months, we disclosed the following categories of Personal Information for a business purpose:

#	Category (corresponding with the table above)	Category of Recipient	Business Purpose
1	Category A Category B Category D Category F Category G	Cloud computing and storage vendors.	Storage, hosting.
2		Government Entities/ Law Enforcement	Compliance with law, such as information requests from tax authorities, the office of an attorney general, a subpoena, etc.
3		Operating systems	Operating the Services.
4	Category A Category F Category G	Data analysis providers and consultants	Providing analytic data on the use of our website and our Services. We limit ability to share such information, as detailed above.
5	Category A Category F Category G	Marketing providers and social networks	Marketing which is not cross-contextual, ad delivery.

6	Category A	Security and analytic service providers	Debugging, security, fraud prevention
7	Category A Category F Category G	Various service providers	Improving the Services, development and maintenance of the Company Platform.
8	Category A	Customer support providers	Customer and technical support.

(E) SALE OR SHARE OF PERSONAL INFORMATION

We have not and do not sell Personal Information. We have not and do not disclose Personal Information in exchange for any form of consideration.

For retargeting and analytic purposes, when we promote our Services, we use third-party tools that are able to market our Services online ("**Campaigns**"), measure those Campaigns, identify individuals that are interested in our Services, and provide other marketing and advertising optimization tools, by placing cookies, pixel or other tracking technology on our website and sharing with vendors and contractors online identifiers and online behavior information collected from the tracking technology. We may share your Personal Information with a third party to help promote our services and understand your use of our website.

In the preceding twelve (12) months, we "sell" or "share", as those terms are used in the Statutes, the following categories of Personal Information for a business purpose:

Category (corresponding with the table above)	Category Recipient	Purpose of Sale or Share
Category A	Marketing tools and vendors.	Share for targeted advertising.

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(F) CHILDREN UNDER AGE 16

We do not knowingly collect information from children under the age of 16.

(G) DATA RETENTION

The retention periods are determined according to the following criteria:

1. For as long as it remains necessary in order to achieve the purpose for which the Personal Data was initially processed. For example: if you contacted us, we will retain your contact information at least until we will address your inquiry.
2. To comply with our regulatory obligations. For example: transactional data will be retained for up to seven years (or even more under certain circumstances) for compliance with bookkeeping obligations.
3. To resolve a claim or dispute, including any legal proceeding, until such claim, dispute or proceeding is resolved, and thereafter if we, in our sole reasonable discretion, deem advisable, in accordance with applicable statutory limitation periods.

Except as required by applicable law, we are not obligated to retain your data for any period, and we reserve our rights to delete it for our convenience at any time, without providing you with prior notice.

PART II: YOUR RIGHTS UNDER THE CCPA AND HOW TO EXERCISE THEM

(H) YOUR RIGHTS UNDER THE CCPA

If you are a California resident, you may exercise certain privacy rights related to your Personal Information. You may exercise these rights free of charge except as otherwise permitted under the Statutes. We may limit our response to your exercise of these privacy rights as permitted under the Statutes, as detailed herein and in the Data Subject Request Form available [here](#).

California Privacy Right	Details
The right to know what Personal Information the business has collected	The right to know what Personal Information the business has collected about the consumer, including the categories of personal information, the categories of sources from which the Personal Information is collected, the business or commercial purpose for collecting, selling, or sharing Personal Information, the categories of third parties to whom the business discloses Personal Information, and the specific pieces of Personal Information the business has collected about the consumer.
Deletion Rights	The right to delete Personal Information that the business has collected from the consumer, subject to certain exceptions.
Correct Inaccurate Information	The right to correct inaccurate Personal Information that a business maintains about a consumer or another business.
Opt-Out of Sharing for Cross-Contextual Behavioral Advertising	You have the right to opt-out of the "sharing" of your personal information for "cross-contextual behavioral advertising", often referred to as "interest-based advertising" or "targeted advertising".
Opt-out from selling	the right to opt-out of the sale or sharing of Personal Information by the business
Limit the Use or Disclosure of SPI	Under certain circumstances, If the business uses or discloses SPI, the right to limit the use or disclosure of SPI by the business.
Opt-Out of the Use of Automated Decision Making	In certain circumstances, you have the right to opt-out of the use of automated decision making in relation to your Personal Information.

Non-Discrimination	The right not to receive discriminatory treatment by the business for the exercise of privacy rights conferred by the Statutes, including an employee's, applicants, or independent contractor's right not to be retaliated against for the exercise of their rights under the Statutes, denying a consumer goods or services, charging different prices or rates for goods or services, providing you a different level or quality of goods or services, etc. We may, however, charge different prices or rates, or provide a different level or quality of goods or services, if that difference is reasonably related to the value provided to us by your Personal Information.
Data Portability	<p>You may request to receive a copy of your Personal Information,</p> <p>including specific pieces of Personal Information, including, where applicable, to obtain a copy of the Personal Information you provided to us in a portable format.</p>

To learn more about your California privacy rights, please visit:

<https://oag.ca.gov/privacy/privacy-laws>.

(I) HOW CAN YOU EXERCISE THE RIGHTS?

We provide a cookie banner and consent management tool that notifies our website of your privacy preferences regarding use of cookies. Please review our [cookie policy](#) for more information.

You may exercise your rights pertaining to your Personal Information by filling out the Data Subject Request Form available [here](#). The form contains the instructions for submission of a request. You may make general inquiries about privacy matters to our privacy team at: dpo@pmail.click.

Right to Limit Use and Disclosure of Sensitive Personal Information . As summarized above, as a California resident, you have the right, at any time, to direct us to limit use of any sensitive personal information we collect about you to that use which is necessary to:

1. perform the provide the goods reasonably expected by you, if you requested particular goods or services,
2. help ensure security and integrity to the extent the use of your personal information is reasonably necessary and proportionate for the purposes of providing the goods or services you requested,
3. offer you short-term, transient use, including, but not limited to, non personalized advertising shown as part of your current interaction with us, provided that your personal information is not disclosed to another third party and is not used to build a profile about you or otherwise alter your experience outside the current interaction with us,
4. perform services on our behalf, including maintaining or servicing accounts, providing customer , processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on our behalf,
5. undertake 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, and
6. comply with regulations promulgated pursuant to the Statutes.

"Sensitive personal information" has been defined above in the table at Part I(A) of this CCPA Notice – see the Box L. For convenience and thoroughness, we repeat that the term means personal information that reveals:

1. Your social security, driver's license, state identification card, or passport number.
2. Your 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.
3. Your precise geolocation.
4. Your racial or ethnic origin, religious or philosophical beliefs, or union membership.

5. The contents of your mail, email, or text messages unless we are the intended recipient of the communication.

6. Your genetic data.

It further includes:

1. The processing of biometric information for the purpose of uniquely identifying you.
2. Personal information collected and analyzed concerning your health.
3. Personal information collected and analyzed concerning your sex life or sexual orientation.

Sensitive personal information that is publicly available shall not be considered sensitive personal information or personal information for purposes of compliance with the Statutes.

You may exercise your right to limit our use of your sensitive personal information by emailing us at dpo@allinoneemail.com with the term "Limit Use and Disclosure of My Sensitive Personal Information" in the subject line, along with your contact information.

(J) AUTHORIZED AGENTS

"Authorized agents" may submit opt out requests on a consumer's or Recipient's behalf. If you have elected to use an authorized agent, or if you are an authorized agent who would like to submit requests on behalf of a consumer or Recipient, the following procedures will be required prior to acceptance of any requests by an authorized agent on behalf of a California consumer. Usually, we will accept requests from qualified third parties on behalf of other consumers, regardless of either the consumer or the authorized agent's state of residence, provided that the third party successfully completes the following qualification procedures:

- a. When a consumer uses an authorized agent to submit a request to know or a request to delete, we may require that the consumer or Recipient do the following:
 1. Provide the authorized agent signed permission or power of attorney to act on their behalf.
 2. Verify their own identity directly with us.
 3. Directly confirm with us that they provided the authorized agent permission to submit a request.

b. We may deny a request from an authorized agent that does not submit proof that they have been authorized by the consumer to act on their behalf.

(K) NOTICE OF FINANCIAL INCENTIVE

We do not offer financial incentives to consumers or Recipients for providing Personal Information.

CONTACT US:

- By Email: dpo@pmail.click
- By first class mail: Panicle INC, Attn: Data Protection Officer, 58-84 Norfolk Street, Ste #23 Newark, NJ 07103

UPDATES:

This notice was last updated on February 22, 2025. We will review and if appropriate, update, this CCPA Notice at least every 12 months. The date of this CCPA Notice's last revision date will be reflected in the "Last Modified" heading at the top of this CCPA Notice.

PART III: OTHER CALIFORNIA OBLIGATIONS

Direct Marketing Requests: California Civil Code Section 1798.83 permits you, if you are a California resident, to request certain information regarding disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please fill out and send us the Data Subject Request Form available [here](#).

Do Not Track Settings: As of the Last Modified date of this CCPA Notice, there is no commonly accepted response for "Do Not Track" signals initiated by Internet web-browsers. Therefore, we do not respond to Do Not Track settings from Internet web-browsers. "Do Not Track" is a privacy preference you may set in your web-browser to indicate that you do not want certain information about your web page visits tracked and collected across websites. For more details, including how to turn on Do Not Track settings in some popular web-browsers, visit: www.donottrack.us. This disclosure is made pursuant to Cal. Bus. And Prof. Code Section 22575.

California's "Shine the Light" law (Civil Code Section § 1798.83) disclosure : California residents may request certain information regarding our disclosure of personal information to third parties for their direct marketing undertakings. To make such a request, please fill out and send us the Data Subject Request Form available [here](#).