

## CCMA, LLC

### Privacy Disclosures for California Residents

These disclosures supplement the Privacy Policy (the “Policy”) of CCMA, LLC, a Delaware limited liability company (“CCMA”), which can be found at [www.ccmallc.com](http://www.ccmallc.com) (the “Site”). These supplemental disclosures are provided pursuant to the California Consumer Privacy Act (“CCPA”), as amended, and apply only to residents of California. Each capitalized term used, but not defined in these disclosures or the Policy, shall have the meaning given to such term in the CCPA.

### Required Disclosures

#### Categories of California Information Collected and Disclosed for a Business Purpose

The following chart is a list of categories of California Information under the CCPA, indicating whether such categories of California Information are collected by CCMA, how long CCMA retains such categories of California Information, whether such categories of Personal Information have been disclosed to third parties, including Contractors and Service Providers, for a business purpose within the preceding 12 months, and the specific business or commercial purpose for the disclosure.

<b>Categories</b>	<b>Example</b>	<b>Collected</b>	<b>Retention Period</b>	<b>Disclosed</b>
Identifiers	name, postal address, e-mail address, telephone number	Yes	This information is retained for the duration of the business relationship between CCMA and the customer or vendor plus an additional two years after which it is then archived and will be deleted upon request.	Yes  CCMA discloses this information to third parties who provide information technology services, data storage services, and distribution logistic services.

Categories	Example	Collected	Retention Period	Disclosed
California Information categories listed in the California Customer Records statute	Name, signature, address, telephone number	Yes	This information is retained for the duration of the business relationship between CCMA and the customer or vendor plus an additional two years after which it is then archived and will be deleted upon request.	Yes  CCMA discloses this information to third parties who provide information technology services, data storage services, and distribution logistic services.
Characteristics of protected classifications under California or Federal law	Gender or date of birth	No	N/A	N/A
Commercial Information	Records of products purchased or considered or other purchasing or consuming histories or tendencies	Yes	This information is retained for the duration of the business relationship between CCMA and the customer or vendor plus an additional two years after which it is then archived and will be deleted upon request.	Yes  CCMA discloses this information to third parties who provide information technology services and data storage services.
Biometric Information	Fingerprints or voiceprints	No	N/A	N/A

<b>Categories</b>	<b>Example</b>	<b>Collected</b>	<b>Retention Period</b>	<b>Disclosed</b>
Internet/Electronic Activity	Browsing history, search history and interaction with a website or application	No	N/A	N/A
Geolocation Data	Device location	No	N/A	N/A
Audio, electronic, visual, thermal or olfactory information	Images and audio, video or call recordings created in connection with business activities	Yes	This information is retained for as long as it is needed for CCMA to provide its products or services after which it is then archived unless deleted.	Yes  CCMA discloses this information to third parties who provide information technology services and data storage services.
Professional or Employment Data	Business contact details in order to provide you with our, or receive your, products and services at a business level	Yes	This information is retained for the duration of the business relationship between CCMA and the customer or vendor plus an additional two years after which it is then archived and will be deleted upon request.	Yes  CCMA discloses this information to third parties who provide information technology services, data storage services, and distribution logistic services.
Education Information	Student records	No	N/A	N/A
Inferences drawn from other personal information	Information reflecting an individual's	No	N/A	N/A

	preferences and characteristics			
Sensitive Personal Information	Definition in the Policy	No	N/A	N/A

Categories of Sources from which California Information is Collected

CCMA obtains California Information through the Site, from third parties acting on behalf of Consumers, or from customers and vendors with whom or which CCMA has a business relationship, including from representatives of CCMA’s customers and vendors. Since CCMA does not have any employees in California, it does not collect any California Information from Consumers who are employees.

Purposes for Collecting California Information

CCMA uses California Information collected by it for one or more of the following business purposes:

- To achieve the purposes for which the California Information was provided (e.g. if a Consumer provides California Information to request a price quote, or ask a question about CCMA’s products or services, CCMA may use that California Information to respond);
- To enable employees of CCMA to provide trading services relating to raw material commodities;
- To record use of the Site, diagnose problems with the Site, and improve, and make the Site more useful to Consumers;
- To send e-mail messages, newsletters, and other correspondence regarding CCMA and its products and services;
- To process payments to CCMA for its products and services;
- To consider individuals for employment, or employ individuals, in a location other than California;
- To provide a Consumer with support, and to respond to questions, regarding products and services of CCMA;
- To respond to requests from law enforcement or other governmental authorities;
- To comply with any applicable law or other legal obligation;
- To prosecute, or defend itself in, a legal dispute or proceeding; and
- For any other business purpose permitted by the CCPA, including any amendments thereto, and its regulations.

### Categories of Third Parties to Whom CCMA Discloses California Information

CCMA may disclose California Information, including any category of California Information collected, with third parties, including Contractors or Service Providers, to enable CCMA to provide products and services, and otherwise conduct its business operations. Categories of such third parties with whom or which CCMA may disclose California Information include the following:

- Electronic billing;
- Accounting services;
- Business intelligence and financial analysis systems;
- Document management;
- Document production;
- Email services;
- Email management and security;
- Learning management;
- Project management;
- Digital dictation;
- Scheduling;
- Contact relationship management;
- Business intake;
- Information governance;
- Information technology;
- Cloud storage; and
- Distribution logistics.

### Categories of California Information Sold or Shared

In the preceding twelve months, CCMA has not sold or shared any California Information with third parties, including, to its knowledge, the California Information of Consumers under sixteen years of age.

### Sensitive Personal Information

In the unlikely event that CCMA collects any Sensitive Personal Information from you, such Sensitive Personal Information will not be used or disclosed for a purpose not otherwise authorized by the CCPA (as amended), corresponding regulations, and guidance provided by the California Privacy Protection Agency.

### **Summary of Consumers' Rights**

The following is a summary of a Consumer's rights under the CCPA, including any amendments thereto:

### Right to Know Specific Information

You have the right to request that CCMA disclose certain information to you regarding your California Information collected by CCMA in the preceding 12 month period or, if requested and the data was collected on or after January 1, 2022, beyond the 12 month period, as long as doing so does not prove impossible or involve disproportionate effort on CCMA. Specifically, you have the right to request the following:

- The categories of California Information collected about you;
- The categories of sources from which the California Information was collected;
- CCMA's business or commercial purpose for collecting your California Information or, if applicable, selling or sharing your California Information;
- The categories of third parties to whom CCMA discloses your California Information; and
- The specific pieces of California Information collected about you.

### Right to Delete Information

You may request that CCMA delete any of your California Information retained by it, subject to certain exceptions. Upon receiving and confirming your California Request (as defined below), CCMA will delete (and direct its Contractors and Service Providers to delete) such California Information from CCMA's (or such Contractors' or Service Providers') records, except that CCMA may deny your request if retaining the California Information is necessary for CCMA or one of its Contractors or Service Providers to:

- Complete the transaction for which CCMA collected the California Information, provide requested products and services, take actions reasonably anticipated within the context of CCMA's ongoing business relationship with you, or otherwise perform a contract between CCMA and you;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activity;
- Debug products to identify and repair errors that impair intended functionality;
- Exercise free speech, ensure the right of another Consumer to exercise his or her free speech rights, or exercise another right provided by law;
- Comply with the California Electronic Privacy Act (Cal. Penal Code § 1546 et. seq.);
- Enable solely internal uses that are reasonably aligned with Consumer expectations based on a Consumer's relationship with CCMA;

- Maintain internal records reasonably required for audits by external and internal auditors (including, but not limited to, accountants, banks and other financial institutions, and government authorities);
- Comply with a legal obligation; and
- Make other internal and lawful uses of California Information that are compatible with the context in which the California Information was provided.

### Right to Correct Information

You may request that CCMA correct your Personal Information if it is inaccurate, taking into account the nature of the California Information and the purposes of the processing of the California Information. Upon receiving your California Request, CCMA will use commercially reasonable efforts to correct your California Information.

### No Discrimination

CCMA will not discriminate against a Consumer for exercising any rights under the CCPA, as amended. In particular, if a Consumer exercises any such rights, CCMA will not:

- Deny products or services to a Consumer;
- Charge a Consumer different prices or rates for products or services, including through granting discounts or other benefits, or imposing penalties;
- Provide a Consumer a different level or quality of products or services; or
- Suggest that a Consumer may receive a different price or rate for products or services, or a different level or quality of products or services.

However, CCMA may offer a Consumer certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any such financial incentives offered by CCMA will reasonably relate to the value of California Information, and contain written terms that describe the material aspects of such financial incentives. A Consumer's prior opt-in consent, which may be revoked at any time, is required before the Consumer obtains such financial incentives.

### Verifiable Consumer Requests

To exercise your rights described in these disclosures and the Policy, you must submit a verifiable consumer request (a "California Request") to CCMA as set forth in the Contact Information Section of the Policy. Only you, or an agent registered with the California Secretary of State that you authorize to act on your behalf, may make a California Request relating to your California Information. You may also make a California Request on behalf of your minor child.

The California Request must:

- Provide sufficient information that allows CCMA to reasonably determine you are the person about whom CCMA collected California Information or an authorized representative.
- Describe your request with sufficient detail that allows CCMA to properly understand, evaluate, and respond to it.

CCMA cannot respond to a request or provide California Information if it cannot verify your identity or the individual's authority to make the request on your behalf unless it can confirm that the California Information relates to you. CCMA will only use California Information provided in a California Request to verify the requestor's identity or authority to make the request.

#### CCMA's Response

CCMA endeavors to respond to a California Request within 45 days of its receipt. If CCMA requires more time (up to an additional 45 days), we will inform you of the reason and extension period in writing. CCMA will deliver its written response by mail or electronically, at your option. Any disclosures provided by CCMA will only cover the 12-month period preceding receipt of the verifiable consumer request. However, if the California Information was collected on or after January 1, 2022 and your request is for longer than the 12-month preceding period, CCMA will disclose the data requested, as long as doing so does not prove impossible or involve disproportionate effort to CCMA. The response provided by CCMA will, if applicable, also explain the reasons CCMA cannot comply with a request. For data portability requests, CCMA will select a format to provide your California Information that is readily useable and should allow you to electronically transmit the information from one entity to another entity without hindrance.

CCMA does not charge a fee to process or respond to your California Request unless it is excessive, repetitive, or manifestly unfounded. If CCMA determines that your request warrants a fee, CCMA will tell you why a fee is warranted and provide you with a cost estimate before completing the request.

#### **Revisions to These Disclosures**

CCMA may revise these disclosures from time to time by posting the revisions on the Site. Any such revision will take effect immediately upon such posting, but will only relate to California Information collected after such revision is posted. It is a Consumer's responsibility to periodically check the Site for revisions to these disclosures.



**Effective Date: August 2, 2024**