

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 (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.

Definitions

Capitalized terms shall have the same meaning as the terms defined in the Policy. In addition, in these Disclosures:

(a) “**Cross-Context Behavioral Advertising**” means the targeting of advertising to a consumer based on the consumer’s Personal Information obtained from the consumer’s activity across businesses, distinctly-branded websites, applications, or services, other than the business, distinctly-branded website, application, or service with which the consumer intentionally interacts.

(b) “**Sensitive Personal Information**” means all (i) Personal Information that reveals (A) a California resident’s social security, driver’s license, state identification card, or passport number; (B) a California resident’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; (C) a California resident’s precise geolocation; (D) a California resident’s racial or ethnic origin, religious or philosophical beliefs, or union membership; (E) the contents of a California resident’s mail, email and text messages, unless CCMA is the intended recipient of the communication; (F) a California resident’s genetic data; and (ii) (A) the processing of biometric information for the purpose of uniquely identifying a California resident; (B) Personal Information collected and analyzed concerning a California resident’s health; or (C) Personal Information collected and analyzed concerning a California resident’s sex life or sexual orientation; Sensitive Personal Information that is “publicly available” pursuant to the California Laws is not considered Sensitive Personal Information or Personal Information.

(c) “**Share**,” “**Shared**,” or “**Sharing**” means sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s Personal Information, including California Information, by CCMA to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration, including transactions between a business and a

third party for Cross-Context Behavioral Advertising for the benefit of a business in which no money is exchanged.

Categories of Personal Information Collected, Disclosed and Shared for a Business Purpose

In the past twelve months, CCMA has collected, disclosed and Shared the following categories of California Information to the third parties, set forth below.

Categories of California Information We Collect	Is California Information Shared	Categories of Third Parties with Which We Share California Information	Is California Information Disclosed	Categories of Third Parties to Which we Disclose California Information
Identifiers. This includes name, address, email, and phone number.	No	N/A	Yes	CCMA discloses this information to third parties who provide information technology services and data storage services.
Personal Information categories listed in the California Customer Records statute. This includes, 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, employment, employment history, bank account number, credit card number, debit card number, or any other financial information.	No	N/A	Yes	CCMA discloses this information to third parties who provide information technology services and data storage services.
Commercial Information. This includes records services	No	N/A	Yes	CCMA discloses this information to third parties who provide information technology

Categories of California Information We Collect	Is California Information Shared	Categories of Third Parties with Which We Share California Information	Is California Information Disclosed	Categories of Third Parties to Which we Disclose California Information
provided and engagement history.				services and data storage services.
Biometric Information. This includes fingerprints or voiceprints.	No	N/A	No	N/A
Internet/Electronic Activity. This includes browsing history, search history and interaction with a website or application	No	N/A	No	N/A
Geolocation Data. This includes device location.	No	N/A	No	No
Audio, electronic, visual, thermal, olfactory or similar technology. This includes images and audio, video or call recordings created in connection with business activities.	No	N/A	Yes	CCMA discloses this information to third parties who provide information technology services and data storage services.
Professional or Employment Information. This includes business contact information used to deliver products or services.	No	N/A	Yes	CCMA discloses this information to third parties who provide information technology services, data storage services and distribution logistic services.
Educational Information. This includes student records.	No	N/A	No	N/a
Inferences drawn from other personal information. This includes information	No	N/A	No	N/A

Categories of California Information We Collect	Is California Information Shared	Categories of Third Parties with Which We Share California Information	Is California Information Disclosed	Categories of Third Parties to Which we Disclose California Information
reflecting an individual's preferences and characteristics.				
Sensitive Personal Information. This includes social security, driver's license, state identification card, or passport number; 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 precise geolocation; racial or ethnic origin, religious or philosophical beliefs, or union membership; contents of a consumer's mail, email, and text messages unless CCMA is the intended recipient of the communication; or a consumer's genetic data.	No	N/A	No	N/A

Categories of Sources from which Personal Information is Collected

CCMA collects California Information through the Site, from third parties acting on behalf of consumers, or from clients with whom or which CCMA has a business relationship, including from representatives of CCMA's clients.

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 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.

Retention of California Information

CCMA keeps Personal Information as long as it is needed to provide our products and services, maintain the relationship between CCMA and the customer or vendor, comply with legal

obligations, or protect our interests. CCMA decides how long we need information on a case-by-case basis. The following factors are taken into consideration when making such a determination:

- If CCMA needs the Personal Information to operate or to provide our products and services.
- The amount, nature, and sensitivity of the Personal Information.
- The feature we use it for, and how that feature works.
- How long we need to retain the Personal Information to comply with certain legal obligations.

If CCMA needs it for other legitimate purposes, such as to prevent harm, investigate possible violations of our terms or policies, promote safety, security and integrity, or to protect CCMA and its employees, including protection of rights, property, or commercial interests.

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 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. The response provided by CCMA will, if applicable, 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. It is a Consumer's responsibility to periodically check the Site for revisions to these disclosures.

Effective Date: July 15, 2026