

Privacy Notice for Transferees & Assignees California Residents

Effective Date: January 1, 2020

This **Privacy Notice for Transferees & Assignees** who are **California Residents** (this “**Notice**”) supplements the information contained in Dwellworks, LLC’s general Privacy Policy and describes how Dwellworks, LLC and its worldwide subsidiaries and affiliates, collects and processes Personal Information when we provide relocation services to the Transferees and Assignees of our clients, as described below. This Notice applies solely to all visitors to our websites, users of our services, and any others who reside in the State of California (“**consumers**” or “**you**”). We adopt this Notice to comply with the California Consumer Privacy Act of 2018 (“**CCPA**”) and any terms defined in the CCPA have the same meaning when used in this Notice.

Dwellworks, LLC’s subsidiaries and affiliates include:

- Dwellworks Destination Services, LLC;
- Dwellworks Property Advising Services, Inc.;
- Dwellworks Property Advisors, LLC dba Station Cities;
- Dwellworks Residential Services, LLC;
- Dwellworks GmbH;
- Irish Relocation Services Limited;
- County Homeseach International Limited;
- Dwellworks Hong Kong Limited;
- Dwellworks Canada, Inc.;
- Dwellworks Costa Rica Ltda.;
- Dwellworks Mexico S. de R.L. de C.V.
- Dwellworks Australia Pty. Ltd.; and
- Dwellworks Netherlands B.V.

(collectively, “**Dwellworks**,” “**we**,” “**us**,” or “**our**”).

Information We Collect

Dwellworks collects information from Relocation Management Companies (“**RMC(s)**”) and direct corporate clients that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“**Personal Information**”). In particular, Dwellworks has collected the following categories of Personal Information from its RMCs and direct corporate clients within the last twelve (12) months:

Category	Personal Information	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
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. Some Personal Information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, and sex.	YES
D. Commercial information.	Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
F. Professional or employment-related information.	Current or past job history.	YES

Personal Information does not include publicly available information from government records, deidentified or aggregated consumer information, or information excluded from the CCPA's scope, like 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 Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

Dwellworks obtains the categories of Personal Information listed above from your employer or your employer's RMC.

Use of Personal Information

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

- To fulfill or meet the reason that the Personal Information was provided to us. For example, if you are relocating and your employer or your employer's RMC shares your Personal Information to fulfill the requested relocation services, we will use that Personal Information to complete the relocation services. We may also save your information to facilitate new service orders.
- To provide, support, personalize, and develop our website and services.
- To create, maintain, customize, and secure your account with us, if any.
- To process your requests and purchases, transactions, and payments related to your relocation and to prevent transactional fraud.
- 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 website experience and to deliver content and service offerings relevant to your interests, including targeted offers and ads through our website, third-party sites, and via email or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our website, services, databases and other technology assets, and business.
- For testing, research, analysis, and development, including to develop and improve our website and services.
- To respond to law enforcement requests and as required by applicable law, and for compliance, legal, regulatory, or document retention policy purposes.
- 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 Dwellworks assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by Dwellworks is among the assets transferred.

Dwellworks 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.

Sharing Personal Information

Dwellworks may disclose your Personal Information to a third party for a business purpose. When we disclose Personal Information for a business purpose, we enter into a contract that describes the purpose and requires the recipient to both keep that Personal Information confidential and not use it for any purpose except performing the contract.

We disclose your Personal Information for a business purpose to service providers or to affiliates or subsidiaries of Dwellworks. In the preceding twelve (12) months, Dwellworks has disclosed the following categories of Personal Information for a business purpose:

- Identifiers.
- California Customer Records Personal Information categories.
- Protected classification characteristics under California or federal law.
- Commercial information.
- Internet or other similar network activity.
- Professional or employment-related information.

Sales of Personal Information

In the preceding twelve (12) months, Dwellworks has not sold Personal Information.

Your Rights and Choices

The CCPA provides you (as a California resident) with specific rights regarding your Personal Information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that Dwellworks disclose certain information to you about our collection and use of your Personal Information over the past twelve (12) months. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will disclose to you:

- The categories of Personal Information we collected about you from your employer or your employer's RMC.
- The categories of sources (i.e. your employer or your employer's RMC) for the Personal Information we collected about you.
- Our business or commercial purpose for collecting 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 from your employer or your employer's RMC (also called a data portability request).
- If we disclosed your Personal Information for a business purpose, a list identifying the Personal Information categories that each category of recipient obtained.

Deletion Request Rights

You have the right to request that Dwellworks delete any of your Personal Information that we collected and retained from your employer or your employer's RMC, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will delete (and direct our service providers to 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 provider(s) to:

1. Complete the transaction for which we collected the Personal Information, provide a service that your employer or your employer's RMC requested, take actions reasonably anticipated within the context of our ongoing business relationship with your employer or your employer's RMC, or otherwise perform our contract with your employer or your employer's RMC.
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, 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 *et. 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 your employer or your employer's RMC provided it.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at 1800 399 2626; or
- Completing our Data Subject Access Request & Request for Erasure Application.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your Personal Information. You may also make a verifiable consumer request on behalf of your minor child. You may only make a verifiable consumer request for access or data portability twice within a twelve (12) month period. The verifiable consumer 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; and
- 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.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to an additional 45 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the twelve (12) month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will 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.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

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

However, we may 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. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

Changes to Our Privacy Notice

Dwellworks reserves the right to amend this Notice at our discretion and at any time. When we make changes to this Notice, we will post the updated notice on our website and update the notice's effective date. **Your continued use of our website following the posting of changes constitutes your acceptance of such changes.**

Contact Information

If you have any questions or comments about this Notice, the ways in which Dwellworks collects and uses your information described below and in the **Privacy Policy**, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: 1800 399 2626

Application: Data Subject Access Request & Request for Erasure.

Email: compliance@dwellworks.com

Postal Address:

Dwellworks, LLC

Attn: Chief Privacy Officer

1317 Euclid Avenue

Cleveland, Ohio 44115 USA