

Privacy Notice for California Residents

Effective Date: January 1, 2020

Last Reviewed on: January 1, 2020

This **Privacy Notice for California Residents** supplements the information contained in Penumbra's [Privacy Notice](#) and solely applies to all visitors, users, and 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.

Section 1. Information We Collect

This Website collects 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 consumer, household, or device ("**personal information**"). In particular, this Website has collected the following categories of personal information from its users within the last twelve (12) months:

- A. Identifiers.** This category includes information such as your name, address, email address or other forms of identifiers that can identify a particular user, family or device.
- This Website may collect: a real name, an alias, a postal address, or other types of unique personal identifiers that are voluntarily provided by you through the Website. The Website may also collect an online identifier, Internet Protocol address, email address or other similar identifiers.
- B. Customer records (California Customer Records statute Cal. Civ. Code § 1798.80(e)).** This category includes 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.
- This Website may collect: a real name, an alias, a postal address, telephone number, email address or any other information that are voluntarily provided by you through the Website.
- C. Protected classification characteristics under California or federal law.** This category includes characteristics of protected classifications under California or federal law like race, national origin, religion, gender or sexual orientation.
- This information is not collected by the Website unless voluntarily provided by you through the Website.
- D. Commercial information.** This category includes information such as records of personal property and purchasing habits.
- This information is not collected by the Website unless voluntarily provided by you through the Website.
- E. Internet or other similar network activity.** This category includes information like browsing history and search history.

- This Website collects user browsing history, search history, and information on a consumer's interaction with a website or application. This information may be collected from observing your actions on our Website.

F. Geolocation data. This category includes information like physical location or movements.

- This Website may collect information about a user's physical location. This information may be collected from observing your actions on our Website or if this information is voluntarily provided by you through the Website.

G. Professional or employment-related information. This category includes information like current or past job history or performance evaluations.

- This information is not collected by the Website unless voluntarily provided by you through the Website.

H. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)). This category includes information regarding 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.

- This information is not collected by the Website unless voluntarily provided by you through the Website.

Section 2. Use of Personal Information

We may use or disclose the personal information we collect described in Section 1 for one or more of the following business purposes:

- a. To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to ask a question about our products, we will use that personal information to respond to your inquiry.
- b. To provide support, personalization, and development our Website and products.
- c. To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- d. To help maintain the safety, security, and integrity of our Website, products, databases and other technology assets, and business.
- e. For testing, research, analysis, and product development, including to develop and improve our Website and products.
- f. To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- g. As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- h. To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our Website users is among the assets transferred.

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.

Section 3. Sharing Personal Information

Penumbra does not sell, rent or trade any of the personal information collected on this Website.

We may disclose your personal information described in Section 1 to a third party for the business purposes described in Section 2. When we disclose personal information for a business purpose, we enter 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.

In the preceding twelve (12) months, we have disclosed personal information with the following categories of third parties:

- Service providers.
- Affiliates, subsidiaries, partners.
- Internet cookie data recipients

Section 4. Your Rights and Choices

This section describes your CCPA rights regarding personal information and explains how to exercise those rights.

A. Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Please see Exercising Access, Data Portability, and Deletion **C** below for instructions to submit such a request.

B. Deletion Request Rights

You have the right to request that we delete your personal information that we collected from you and retained, subject to certain exceptions. Please see Exercising Access, Data Portability, and Deletion Rights below for instructions to submit such a request.

C. Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, you (or your authorized agent) can submit a verifiable consumer request by either:

- Calling us at +1 (800) 916-7037 (Company Identifier PEN)
- Emailing us at dataprivacy@penumbrainc.com
- Visiting Penumbra's [contact webform](#)

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. 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.
- 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.

D. 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 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response electronically.

Any disclosures we provide will only cover the 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 easily.

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.

Section 5. Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Discrimination could include denying you goods, charging you different prices or rates for goods, or providing you a different quality of goods based on you exercising any of your CCPA rights.

Section 6. Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the 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.**

Please email dataprivacy@penumbrainc.com for any CCPA related questions you might have.