

CCPA Privacy Notice for California Residents

This Privacy Notice for California Residents (**“the Privacy Notice”**) supplements the information contained in the Privacy Policy of Acorn Mobility Services Limited and its subsidiaries (collectively, "Acorn Stairlifts " or "us" or "we") and applies solely to individuals who reside in the State of California, as defined in Section 17014 of Title 18 of the California Code of Regulations, who have specific rights regarding their personal information.

The Privacy Notice is effective as of January 1, 2020, pursuant to the California Consumer Privacy Act of 2018 (“CCPA”) and applies to the websites (all of them referred to hereinafter as “Sites”) operated by any Acorn Stairlifts entities. It also applies to Acorn Stairlifts’ provision of products and services to you and/or where you provide us with Personal Information.

Personal Information

"Personal Information" consists of any 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 or household.

In particular, Acorn Stairlifts has collected the following categories of Personal Information within the last twelve (12) months:

Category	What personal data do we collect
Identifiers	<p>Contact details such as real name, alias, postal address, email address.</p> <p>Other unique identifiers include: device IP address, cookie string data, operating system, and (in the case of mobile devices) your device type, and mobile device's identifier (such as the Apple IDFA or Android Advertising ID) and any other unique identifier that may be assigned to any device by third parties and cross-referenced to recognize a device.</p>
Personal information categories listed in the California Customer Records statute (Cal.Civ. Code § 1798.80(e))	<p>A name, signature, address, telephone number, debit card number, credit card number, bank account number, medical information or health insurance information.</p> <p>Note: Some personal information included in this category may overlap with other categories.</p>
Protected classification characteristics under California or federal law	Age, gender, marital status, medical condition, physical or mental disability

Commercial Information	Products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with an internet website or advertisement.
Geolocation data	Non-precise geolocation derived from IP address.
Medical information	Conditions
Inferences drawn from other Personal Information	Creating profiles that reflect consumer preferences and interests.

For the avoidance of doubt, under CCPA, Personal Information does not include:

- Publicly available information from federal, state, or local government records;
- Deidentified or aggregated consumer information; and
- Information excluded from the CCPA's scope such as:
 - medical information governed by the California Confidentiality of Medical Information Act (CMIA);
 - protected health information collected by a covered entity or business governed by the Health Insurance Portability and Accountability Act of 1996 (HIPAA);
 - clinical trial data subject to the Federal Policy for the Protection of Human Subjects;
 - 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.

Sources of Personal information

We collect Personal Information from various sources, including:

- From you directly;
- From our authorized Acorn Stairlifts Partners;
- From our Sites; and
- From third parties, including but not limited to advertisers, social media networks and companies that do market research, statistical and behavioural analysis (e.g. Google and Facebook).

Information collected from our Sites

We collect two types of information from visitors to the Sites:

- Personal Information that is voluntarily submitted through our online forms; and
- Non-personal anonymous data that is automatically collected.

Non-personal data can be technical in nature and is only analysed in anonymised form for statistical purposes.

Examples of non-personal data include the following:

- Cookie – A “cookie” is a small text file that is saved to and, during subsequent visits, retrieved from, your computer or mobile device. Acorn Stairlifts uses cookies to enhance and simplify your visit. We do not use cookies to disclose information to third parties.

There are also third-party cookies on our Sites, which we use to collect statistics in aggregate form in analysis tools. Some of these cookies may track your behaviour across multiple websites.

There are two types of cookies: persistent and temporary (session) cookies.

Persistent cookies are stored as a file on your computer or mobile device for a time period no longer than 24 months. You can easily erase cookies from your computer or mobile device using your browser. For instructions on how to handle and delete cookies please look under "Help" in your browser. You can choose to disable cookies, or to receive a notification each time a new cookie is sent to your computer or mobile device. However, please note that if you choose to disable cookies, you may not be able to take advantage of all features.

- Web Beacons (also known as "clear gifs," "web bugs" or "pixel tags") - "Web Beacons" are graphics with a unique identifier, similar in function to cookies, and are used to allow us to count users who have visited certain pages of the Sites and to help determine the effectiveness of promotional or advertising campaigns. In contrast to cookies, which are stored on a user's computer hard drive, web beacons are embedded on web pages.
- Demographic Information - "Demographic Information" may be your gender, age, zip code, geolocation data and interests, which you voluntarily provide through the Sites. We use this information to provide you with personalized services and to analyse trends to ensure that the information provided by the Sites meets your needs. Please note that aggregated information, which is not personally identifiable, shall be treated as non-personal data.

Online Tracking

Please note that our Sites do not support “Do Not Track” browser settings and do not currently participate in any “Do Not Track” frameworks that would allow us to respond to signals or other mechanisms from you regarding the collection of your personal or non-personally identifiable information.

Links

The Sites may include links to other websites which do not fall under our supervision. We cannot accept any responsibility for the protection of the privacy or the content of these websites, but we offer these links to make it easier for our visitors to find more information about specific subjects.

Use of information that we collect

We will use your Personal Information for several general purposes including:

- To fulfil or meet the reason you provided the information
 - If you share your name and contact information to request a stairlift quote, our brochure or call us to ask a question about our products or services, we will use that Personal Information to respond to your inquiry; and
 - If you provide your Personal Information to purchase our product or service, we will use that information to process your payment and facilitate delivery.
- To administer our contracts with you;
- To answer your queries or complaints, or fulfil any requests for information or services placed by you or your authorized contacts/persons;
- To investigate any misuse of your account, fraud and debt collection;
- To protect the security and integrity of our Sites and our business;
- To offer Live Chat assistance to respond to your online inquiries;
- To personalize and further develop our products and services;
- To facilitate your use of our Sites;
- To conduct marketing and business analysis;
- To respond to law enforcement requests and as required by applicable law, court order or governmental regulations; and
- To perform other functions or serve other purposes, as disclosed to you at the point of collection or permitted by law;

Direct marketing

Acorn Stairlifts may use your Personal Information for the purpose of tailored marketing communications such as new product launches, loyalty schemes, special offers and other information which we think you may find of interest including products and services of selected third parties.

We do not disclose your Personal Information to third parties for their direct marketing purposes.

You have the right to withdraw your consent for the processing of your Personal Information at any time and to object to direct marketing.

You can opt out from direct marketing by the following means:

- following the instruction in each marketing post
- contacting customer service at customerservice@acornstairlifts.com

Who we share your Personal Information with

Acorn Stairlifts do not sell your Personal Information. We may, however, share or disclose your data to:

- selected third parties processing data on Acorn Stairlifts' behalf, for the purposes of providing a service to you and understanding your use of our products and services, in accordance with this privacy policy; and
- the Government or regulators, where we are required to do so by law or to assist with their investigations, and with the Police to assist with the investigation and prevention of crime.

Your Rights and Choices in relation to your Personal Information

The CCPA provides California residents with specific rights regarding their Personal Information. This section outlines the rights of California residents under CCPA and provides information on how to exercise those rights.

Your rights are as follows:

Right to Know and Access

We are obliged to disclose certain information to you about our collection and use of your Personal Information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of Personal Information we collected or disclosed about you;
- The categories of sources for the Personal Information we collected about you;
- The categories of third parties with whom we share that Personal Information;
- The specific pieces of Personal Information we have collected about you during the past twelve months; and
- The business purposes.

Right to Delete

Where no overriding legal basis continues to exist, you may request that we delete the Personal Information that we collected from you and retained. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies.

Reasons why we may deny your Personal Information deletion request:

- To complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
- To detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- To debug products to identify and repair errors that impair existing intended functionality;
- To exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
- To comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.);
- To 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;
- To enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
- To comply with a legal obligation; and
- To make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Right to Opt-Out of Sale

Acorn Stairlifts do not sell your Personal Information.

Right to Non-Discrimination

Acorn Stairlifts will not discriminate against any California consumer who exercises any of the rights described above. Specifically, we will not deny you goods or services; charge you different prices or rates including through granting discounts or other benefits, or imposing penalties; provide you with a different level of service or quality of goods or services; or suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Exercising Your Rights

If you are a California consumer and would like to exercise any of the CCPA rights identified above, you may submit a request by:

Email: privacy@acornstairlifts.com

Post: FAO Compliance Manager, Acorn Stairlifts Inc., 7001 Lake Ellenor Drive, Orlando, Florida 32809, USA

Phone: Toll-FREE: 1-888-563-0410

Only you, or a person registered with the California Secretary of State that you authorise 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.

If requests are submitted more than twice within a 12-month period, we reserve the right to refuse them. If answering requests is likely to require additional time or occasions unreasonable expense (which you may have to meet), we will inform you.

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 authorised 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/or
- confirm that the Personal Information relates to you.

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 endeavour 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 by mail or 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 will allow you to transmit the information from one entity to another entity without hindrance.

Changes to our Privacy Notice

We reserve the right to amend this Privacy Policy at our discretion and at any time. When such a change is made we will post a revised version on the Site.

Where required by law, we will seek your consent to changes in the way we use your Personal Information. Your continued use of the website will indicate your agreement to any such change.

Contact

If you have any further enquiries or concerns about our privacy notice, please feel free to contact us. All enquiries will be treated in a confidential manner.

FAO Compliance Manager

Acorn Stairlifts Inc., 7001 Lake Ellenor Drive, Orlando, Florida 32809, USA

Email: privacy@acornstairlifts.com