

**Pashman Stein Walder Hayden, P.C.**  
**California Consumer Privacy Act**  
**Notice to California Residents**  
**Last Updated: December 6, 2021**

This Notice to California Residents (“CCPA Notice”), supplements our Privacy Policy and is provided by Pashman Stein Walder Hayden, P.C. (“PSWH,” “Company,” “we,” “us,” or “our”) pursuant to the California Consumer Privacy Act (“CCPA”), applies to natural persons who reside in the State of California (“consumers” or “you”), that visit our website [www.pashmanstein.com](http://www.pashmanstein.com) (the “Website”), from whom we purchase products or services, or otherwise engage or interact with us. Any terms used herein but not defined shall have the meaning assigned in our [Privacy Policy](#) or the CCPA, as applicable.

In the event of any conflict or inconsistency between this CCPA Notice and our Privacy Policy, this CCPA Notice shall control only with respect to the Personal Information (as defined in CCPA) of consumers, their households or devices. If you are located outside of the State of California this CCPA Notice does not apply to you and you should refer to our Privacy Policy. Our employees, job applicants, contractors, managing members, directors and officers have received a separate notice under CCPA.

### **Information We Collect**

***Categories of Personal Information.*** Company has or may have collected and/or received the Categories of Personal Information identified below (with examples) from or about consumers, their households or devices, within the twelve (12) months preceding the Last Update of this CCPA Notice (“Last Update”). Personal Information does not include (i) publicly available information from government records; (ii) deidentified or aggregated Personal Information; or (iii) information excluded from the CCPA including information regulated by certain sector-specific data protection laws including the Health Insurance Portability and Accountability Act of 1996, the California Confidentiality of Medical Information Act, the Gramm-Leach-Bliley Act of 1999, and the California Financial Information Privacy Act.

- **Identifiers** including a real name, alias, postal address, unique personal identifier, online identifier, IP address, email address, account name, or other similar identifiers.
- **Categories of Personal Information Listed in Cal. Civ. Code § 1798.80(e)** including, a name, signature, address, telephone number, bank account number, or any other financial information. Some Personal Information included in this category may overlap with other categories.
- **Protected classification characteristics under California or federal law** including, age (40 years or older), national origin, citizenship and marital status.

- **Biometric information** including, identifying information, such as fingerprints and facial images.
- **Internet or other similar network activity** including, browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
- **Geolocation data.**
- **Audio, electronic, visual or similar information.**
- **Inferences** drawn from above information to create a profile reflecting consumers' interests and preferences.

**Categories of Sources.** We collect the Categories of Personal Information listed above from the following Categories of Sources: (i) directly from consumers (e.g., forms, surveys, responses, or other direct interactions from or with consumers), (ii) indirectly from consumers (e.g., consumer activity online, interactions with our Website and other sites), (iii) advertising networks, (iv) data analytics providers., (v) government entities/databases, and (vi) social networks.

**Use of Personal Information.** We may use or disclose the Personal Information we collect for one or more of the following commercial or business purposes (each, a "Business Purpose"): (i) the commercial and business purposes set forth in the How We Use the Information section of our Privacy Policy, (ii) to investigate and to manage enquiries, disputes and legal proceedings, (iii) comply with court orders, mandatory dispute resolution determinations and mandatory government authority or law enforcement orders or directions, (iv) as described to you when collecting your Personal Information or as otherwise permissible under the CCPA, and (v) to evaluate or consummate 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 is among the assets transferred.

**Categories of Third Party Recipients.** We may share your Personal Information with the following Categories of Third Party Recipients for Business Purposes:

- **Service Providers**, which include IT and cloud hosting companies, payment providers, transactions reporting providers, customer relationship management, email marketing providers, analytics providers, and providers of administrative services.

**Disclosures of Personal Information for a Business Purpose.** In the twelve (12) months preceding the Last Update, we may have disclosed the Categories of Personal Information for a Business Purpose to the Categories of Third Parties set forth in Table I.

**Table I**

<b>Categories of Personal Information Collected</b>	<b>Categories of Third Party Recipients</b>
Identifiers	Service Provider
Categories of Personal Information Listed in Cal. Civ. Code § 1798.80(e)	Service Provider
Protected classification characteristics under California or federal law	Service Provider
Biometric information	Service Provider
Internet or other similar network activity	Service Provider
Geolocation data	Service Provider
Audio, electronic, visual, thermal, olfactory, or similar information	Service Provider
Professional or employment-related information	Service Provider
Non-public education information	Service Provider

## **Your Rights and Choices**

The CCPA provides consumers with specific rights regarding their Personal Information. This section describes such rights and explains how to exercise them.

***Right to Know About Personal Information.*** You have the right to request that we disclose certain information to you about our collection, disclosure, sale and use of your Personal Information. Once we receive and verify your request, we will disclose to you the following (to the extent applicable to your request):

- Specific pieces of Personal Information we collected about you in the preceding twelve (12) months (also known as a data portability request);
- Categories of Personal Information we collected about you in the preceding twelve (12) months;
- Categories of Sources from which the Personal Information was collected;
- Our Business Purpose for collecting that Personal Information; and
- If we disclosed your Personal Information for a Business Purpose, Categories of Personal Information that we disclosed for a Business Purpose and the Categories of Third Party Recipients to whom the Personal Information was disclosed.

**Right to Request Deletion.** You have the right to request that we delete any of Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and verify your request, we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies.

**Exercising Rights to Know or Request Deletion.** To exercise the rights to know or request deletion described above, please submit a verifiable consumer request to us by either: (a) calling us at 1-201-488-8200, or (b) submitting your request by email to [info@pashmanstein.com](mailto:info@pashmanstein.com).

You may only make a verifiable consumer request under the right to know twice within a 12-month period. The verifiable consumer request must: (i) provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative; and (ii) 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 related to you.

**Verification Process.** To submit a verifiable consumer request, the consumer may be required to provide up to three data points, which may include additional Personal Information, to enable us to verify the consumer's identity with the degree of certainty required by the CCPA. We will use Personal Information provided in a verifiable consumer request solely for the purpose of verifying the requestor's identity or authority to make the request. We or a third party on our behalf may follow up with you to determine whether a request is a verifiable consumer request under applicable law.

If we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you, we will deny the consumer request in whole or in part and will not to disclose the information requested or, as applicable, will not delete the information requested. We will respond to any such consumer request with a denial, and will also explain why it has no reasonable method by which it can verify the identity of the requestor.

**Response Timing and Format.** We will confirm receipt of a verifiable consumer request within then (10) business days of its receipt. We will endeavor to respond to a verifiable consumer request within forty-five (45) calendar days of its receipt. If we require more time, we will notify you of the extension and provide an explanation of the reason for the extension in writing, and we will provide you with a response no later than ninety (90) calendar days of receipt of the request. 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 from one entity to another entity without hindrance. We may charge a reasonable fee to process or respond to your verifiable consumer requests if they are excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will inform you of the reasons for this decision and provide you with a cost estimate before completing your request.

***Right to Opt-Out of the Sale of Personal Information.*** We do not sell the Personal Information of consumers (including minors under 16 years of age). However, if you are 16 years of age or older, you have the right, at any time, to direct us to not sell your Personal Information (the “right to opt-out”) and if you are under 16 years of age you have the right to opt-in to the sale of your Personal Information.

***Right to Non-Discrimination.*** We will not discriminate against you for exercising any of your CCPA rights. We will not (i) deny you products or services, (ii) charge you different prices or rates for products or services, including through granting discounts or other benefits, or imposing penalties (except for financial incentives permitted by the CCPA, see below), (iii) provide you a different level or quality of products or services, and (iv) suggest that you may receive a different price or rate for products or services or a different level or quality of products or services.

### **Right to Designate an Authorized Agent**

If you submit a request to know or delete your Personal Information through the use of an authorized agent, we may require that you (i) provide the authorized agent written permission to act on your behalf, and (ii) verify their identity directly with us. We may deny a request from an authorized agent that does not submit proof of authorization.

### **Other California Privacy Rights**

Pursuant to California’s “Shine the Light” law (Civil Code Section § 1798.83), California residents have the right to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes, including the names and addresses of those third parties, and examples of the types of services or products marketed by those third parties.

To make such a request, please send an email to [info@pashmanstein.com](mailto:info@pashmanstein.com).

### **Changes to Our CCPA Notice**

This CCPA Notice is effective as of the date of the Last Update stated at the top of this CCPA Notice. We may change this CCPA Notice from time to time with or without notice to you. By visiting or accessing the Website, procuring services from us, or otherwise engaging or interacting with us after we make any such changes

to this CCPA Notice, you are deemed to have accepted such changes. Please be aware that, to the extent permitted by applicable law, and without prejudice to the foregoing, our use of your Personal Information is governed by the CCPA Notice in current effect. Please refer back to this CCPA Notice on a regular basis.

### **Contact Information**

If you have any questions or comments about this notice, the ways in which we collect and use your information described below and in the CCPA Notice, 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: 1-201-488-8200

Website: [www.pashmanstein.com](http://www.pashmanstein.com)

E-mail: [info@pashmanstein.com](mailto:info@pashmanstein.com)

Postal Address: Court Plaza South, East Wing  
21 Main Street, Suite 200  
Hackensack, NJ 07601