

KOA Speer Electronics, Inc. and KOA Speer Holding Corp.

Privacy Disclosures for California Residents

These disclosures supplement the Privacy Policy (the “Policy”) of KOA Speer Electronics, Inc., a Delaware corporation, and KOA Speer Holding Corp., a Nevada corporation, (collectively, “KSE”), which can be found at www.koaspeer.com (the “Site”). They are provided pursuant to the California Consumer Privacy Act (“CCPA”) and apply only to residents of California. Each capitalized term used, but not defined, in these disclosures shall have the meaning given to such term in the CCPA.

Disclosures Required under CCPA

Categories of Personal Information Collected

The following categories of personal information are collected by KSE:

- Identifiers (including, but not limited to, names, Internet protocol addresses, email addresses, physical addresses, and phone numbers);
- Customer records information (including, but not limited to, financial account numbers, and other financial information);
- Network Activity Information; and
- Commercial Information (including, but not limited to, information relating to products and services acquired or considered for acquisition by a consumer).

No other categories of personal information are collected by KSE.

Categories of Sources of Personal Information Collected

KSE obtains personal information from consumers or third parties acting on behalf of consumers (including, but not limited to, individuals or entities with whom or which KSE has a business relationship). Since KSE does not have any employees in California, it does not collect any personal information from consumers who are employees.

Purposes for Collecting Personal Information

KSE uses personal information collected by it for one or more of the following business purposes:

- To achieve the purposes for which personal information was provided (e.g. if a consumer provides personal information to request a price quote, ask a question about KSE’s products or services, or order products or services, KSE will use that information to respond);

- To fulfill future orders for products or services, or to process returns of products;
- To record use of the Site, diagnose problems with the Site, and improve, and make more useful to users of, the Site;
- To send e-mail messages, newsletters, and other correspondence regarding KSE and its products and services;
- To process payments to KSE for its products and services;
- To consider consumers for employment, or employ consumers, in a location other than California;
- To provide a consumer with support, and to respond to questions, regarding products and services of KSE;
- 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; and
- For any other business purpose permitted by the CCPA.

Categories of Third Parties with whom KSE Shares Personal Information

KSE does not sell any personal information to third parties, but may share personal information with third parties to enable KSE to provide products and services, and otherwise conduct its business operations. Categories of third parties with whom or which KSE may share personal information include the following:

- Billing and payment systems;
- Accounting systems;
- Business intelligence and financial analysis systems;
- Document management systems;
- E-mail and facsimile management systems;
- Scheduling systems;
- Contact relationship management systems; and
- Cloud storage systems.

Specific Pieces of Personal Data Collected

KSE collects the following specific pieces of personal information:

- Names;
- Internet protocol addresses;
- E-mail addresses;
- Physical addresses;
- Phone numbers; and
- Financial account information.

Summary of Consumer Rights

Consumers have the following rights regarding their personal information under the CCPA:

Access Rights

Consumers have the right to request that KSE disclose certain information to them regarding their personal information as follows:

- The categories of personal information collected by KSE;
- The categories of sources of the personal information collected by KSE;
- KSE's business or commercial purpose for collecting or, if applicable, sharing personal information;
- The categories of third parties with whom or which KSE shares personal information;
- The specific pieces of personal information collected by KSE; and
- The categories of personal information, if any, KSE disclosed for a business purpose to a third party in the preceding 12 months.

Deletion Rights

Consumers may request that KSE delete any personal information retained by KSE, subject to certain exceptions. Upon receiving and confirming a verifiable consumer request, KSE will delete (and direct its service providers to delete) personal information from KSE's (or such service providers') records, except that KSE may deny a request if retaining the personal information is reasonably necessary for KSE (or one of its service providers) to:

- Complete the transaction for which KSE collected personal information, provide requested goods and services, take actions reasonably anticipated within the context of KSE's ongoing business relationship with the consumer, or perform under a contract;
- 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 Communications Privacy Act (Cal. Penal Code § 1546 et. seq.);
- Enable solely internal uses that are reasonably aligned with consumer expectations based on the consumer's relationship with KSE;
- Comply with a legal obligation; and
- Make other internal and lawful uses of personal information that are compatible with the context in which it was provided.

Verifiable Consumer Requests

To exercise any rights described in these disclosures, a consumer must submit a verifiable consumer request to KSE as set forth in the Policy. Only a consumer, or a person registered with the California Secretary of State that a consumer authorizes to act on his or her behalf, may make a verifiable consumer request relating to personal information. A consumer may also make a verifiable consumer request on behalf of a minor child.

A verifiable consumer request for access to personal information may only be made twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows KSE to reasonably determine that a consumer is the person about whom KSE collected personal information or an authorized representative of the consumer; and
- Describe the request with sufficient detail that allows KSE to properly understand, evaluate, and respond to it.

KSE cannot respond to a request or provide personal information if it cannot verify the consumer's identity or individual's authority to make the request, and confirm the personal information relates to the consumer. KSE will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

KSE's Response

KSE endeavors to respond to a verifiable consumer request within 45 days of its receipt. If KSE requires more time (up to an additional 45 days), KSE will inform the consumer of the reason and extension period in writing. KSE will deliver its written response by mail or electronically, at the consumer's option. Any disclosures provided by KSE will only cover the 12-month period preceding receipt of the verifiable consumer request. The response provided by KSE will, if applicable, also explain the reasons it cannot comply with any portion of a request. For data portability requests, KSE will select a format to provide personal information that is readily useable and should allow the consumer to electronically transmit the information from one entity to another entity without hindrance.

KSE does not charge a fee to process or respond to a verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If KSE determines that the request warrants a fee, it will tell the consumer why a fee is warranted, and provide the consumer with a cost estimate before completing the request.

No Discrimination

KSE will not discriminate against consumers for exercising any rights under the CCPA. In particular, if a consumer exercises any such rights, KSE will not:

- Deny goods or services to a consumer;

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

However, KSE 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 KSE will reasonably relate to the value of personal 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.

[Revisions to These Disclosures](#)

KSE 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, but will only relate to personal information collected after such revision is posted. It is a consumer's responsibility to periodically check the Site for revisions to these disclosures.

Effective Date: January 5, 2021