

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”). These supplemental disclosures are provided pursuant to the California Consumer Privacy Act (“CCPA”), as amended, and apply only to residents of California. Each capitalized term used, but not defined in these disclosures or the Policy, shall have the meaning given to such term in the CCPA.

Required Disclosures

Categories of Personal Information Collected and Disclosed for a Business Purpose

The following chart is a list of categories of Personal Information under the CCPA, indicating whether such categories of Personal Information are collected by KSE, how long KSE retains such categories of Personal Information, whether such categories of Personal Information have been disclosed to third parties, including Contractors and Service Providers, for a business purpose within the preceding 12 months, and the specific business or commercial purpose for the disclosure.

Categories	Example	Collected	Retention Period	Disclosed
Identifiers	Real name, postal address, IP address, e-mail address	Yes	This information is retained for the duration of the business relationship between KSE and the customer or vendor plus an additional one year; in the case of IP addresses, 15 months from your last visit to the Site; and, in the case of email communications with KSE, for a period of four years.	Yes KSE discloses this information to third parties who provide information technology services, data storage services, and product sales and order fulfillment services.

Categories	Example	Collected	Retention Period	Disclosed
Personal Information categories listed in the California Customer Records statute	Name, signature, address, telephone number	Yes	This information is retained for the duration of the business relationship between KSE and the customer or vendor plus an additional one year.	Yes KSE discloses this information to third parties who provide information technology services, data storage services, and product sales and order fulfillment services.
Characteristics of protected classifications under California or Federal law	Gender or date of birth	No	N/A	N/A
Commercial Information	Records of products purchased or considered or other purchasing or consuming histories or tendencies	Yes	This information is retained for the duration of the business relationship between KSE and the customer or vendor plus an additional one year.	Yes KSE discloses this information to third parties who provide information technology services, data storage services, and product sales and order fulfillment services.
Biometric Information	Fingerprints or voiceprints	No	N/A	N/A

Categories	Example	Collected	Retention Period	Disclosed
Internet/Electronic Activity	Browsing history, search history and interaction with a website or application	Yes	This information is retained for a period of fifteen months from your last visit to the Site.	Yes KSE discloses this information to third parties who provide information technology services and data storage services.
Geolocation Data	Device location	No	N/A	N/A
Audio, electronic, visual, thermal or olfactory information	Images and audio, video or call recordings created in connection with business activities	No	N/A	N/A
Professional or Employment Data	Business contact details in order to provide you with our, or receive your, products and services at a business level	Yes	This information is retained for the duration of the business relationship between KSE and the customer or vendor plus an additional one year.	Yes KSE discloses this information to third parties who provide information technology services, data storage services, and product sales and order fulfillment services.
Education Information	Student records	No	N/A	N/A

Categories	Example	Collected	Retention Period	Disclosed
Inferences drawn from other personal information	Information reflecting an individual's preferences and characteristics	No	N/A	N/A
Sensitive Personal Information	Definition in the Policy	No	N/A	N/A

Categories of Sources from which Personal Information is Collected

KSE obtains Personal Information through the Site, from third parties acting on behalf of Consumers, or from customers with whom or which KSE has a business relationship, including from representatives of KSE's customers. 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 the 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 may use that Personal Information to respond);
- To fulfill 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 individuals for employment, or employ individuals, 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, including any amendments thereto, and its regulations.

Categories of Third Parties to Whom KSE Discloses Personal Information

KSE may disclose Personal Information, including any category of Personal Information collected, with third parties, including Contractors or Service Providers, to enable KSE to provide products and services, and otherwise conduct its business operations. Categories of such third parties with whom or which KSE may disclose 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;
- Information technology and data storage systems; and
- Product sales and order fulfillment.

Categories of Personal Information Sold or Shared

In the preceding twelve months, KSE has not sold or shared any Personal Information with third parties, including, to its knowledge, the Personal Information of Consumers under sixteen years of age.

Sensitive Personal Information

In the unlikely event that KSE collects any Sensitive Personal Information from you, such Sensitive Personal Information will not be used or disclosed for a purpose not otherwise authorized by the CCPA (as amended), corresponding regulations, and guidance provided by the California Privacy Protection Agency.

Summary of Consumers' Rights

The following is a summary of a Consumer's rights under the CCPA, including any amendments thereto:

Right to Know Specific Information

You have the right to request that KSE disclose certain information to you regarding your Personal Information collected by KSE in the preceding 12 month period or, if requested and the data was collected on or after January 1, 2022, beyond the 12 month period, as long as doing so does not prove impossible or involve disproportionate effort on KSE. Specifically, you have the right to request the following:

- The categories of Personal Information collected about you;
- The categories of sources from which the Personal Information was collected;
- KSE's business or commercial purpose for collecting your Personal Information or, if applicable, selling or sharing your Personal Information;
- The categories of third parties to whom KSE discloses your Personal Information; and
- The specific pieces of Personal Information collected about you.

Right to Delete Information

You may request that KSE delete any of your Personal Information retained by it, subject to certain exceptions. Upon receiving and confirming your California Request (as defined below), KSE will delete (and direct its Contractors and Service Providers to delete) such Personal Information from KSE's (or such Contractors' or Service Providers') records, except that KSE may deny your request if retaining the Personal Information is necessary for KSE or one of its Contractors or Service Providers to:

- Complete the transaction for which KSE collected the Personal Information, provide requested products and services, take actions reasonably anticipated within the context of KSE's ongoing business relationship with you, or otherwise perform a contract between KSE and you;
- 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 Privacy Act (Cal. Penal Code § 1546 et. seq.);
- Enable solely internal uses that are reasonably aligned with Consumer expectations based on a Consumer's relationship with KSE;
- Maintain internal records reasonably required for audits by external and internal auditors (including, but not limited to, accountants, banks and other financial institutions, and government authorities);
- Comply with a legal obligation; and
- Make other internal and lawful uses of Personal Information that are compatible with the context in which the Personal Information was provided.

Right to Correct Information

You may request that KSE correct your Personal Information if it is inaccurate, taking into account the nature of the Personal Information and the purposes of the processing of the Personal Information. Upon receiving your California Request, KSE will use commercially reasonable efforts to correct your Personal Information.

No Discrimination

KSE will not discriminate against a Consumer for exercising any rights under the CCPA, as amended. 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 products or services, including through granting discounts or other benefits, or imposing penalties;
- Provide a Consumer a different level or quality of products or services; or
- Suggest that a Consumer may receive a different price or rate for products or services, or a different level or quality of products 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.

Verifiable Consumer Requests

To exercise your rights described in these disclosures and the Policy, you must submit a verifiable consumer request (a "California Request") to KSE as set forth in the Contact Information Section of the Policy. Only you, or an agent registered with the California Secretary of State that you authorize to act on your behalf, may make a California Request relating to your Personal Information. You may also make a California Request on behalf of your minor child.

The California Request must:

- Provide sufficient information that allows KSE to reasonably determine you are the person about whom KSE collected Personal Information or an authorized representative.

- Describe your 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 your identity or the individual's authority to make the request on your behalf unless it can confirm that the Personal Information relates to you. KSE will only use Personal Information provided in a California Request to verify the requestor's identity or authority to make the request.

KSE's Response

KSE endeavors to respond to a California Request within 45 days of its receipt. If KSE requires more time (up to an additional 45 days), we will inform you of the reason and extension period in writing. KSE will deliver its written response by mail or electronically, at your option. Any disclosures provided by KSE will only cover the 12-month period preceding receipt of the verifiable consumer request. However, if the Personal Information was collected on or after January 1, 2022 and your request is for longer than the 12-month preceding period, KSE will disclose the data requested, as long as doing so does not prove impossible or involve disproportionate effort to KSE. The response provided by KSE will, if applicable, also explain the reasons KSE cannot comply with a request. For data portability requests, KSE will select a format to provide your Personal Information that is readily useable and should allow you to electronically transmit the information from one entity to another entity without hindrance.

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

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, 2023