



CALIFORNIA RESIDENT PRIVACY NOTICE

Effective Date: 01 September 2022

Andela Inc., its subsidiaries and affiliates (“**Andela**”, “**we**”, “**our**”, and/or “**us**”) are committed to upholding the privacy rights of individuals (“**you**”, “**Users**”). Andela provides this California Resident Privacy Notice to supplement the information and disclosures contained in our [Privacy Policy](#). It applies to individuals residing in California from whom we collect Personal Information as a business under the CCPA.

1. PERSONAL INFORMATION, COLLECTION, DISCLOSURE AND SALE

For the purposes of this notice, **Personal Information** means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household, or as otherwise defined by the California Consumer Privacy Act of 2018 (California Civil Code §§ 1798.100 to 1798.199) and its implementing regulations, as amended or superseded from time to time (“**CCPA**”).

Personal Information does not include information that is:

- Lawfully made available from government records.
- Deidentified or aggregated.
- Otherwise excluded from the scope of the CCPA.

<p>The chart below provides the categories of Personal Information (as defined by the CCPA) we have collected, disclosed for a business purpose, or sold in the preceding twelve months since this notice was last updated. The examples of Personal Information provided for each category reflect each category’s statutory definition and may not reflect all of the specific types of Personal Information associated with each category.</p>	We Collect	We Disclose	We Sell
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<p>A. Identifiers</p> <p><i>Examples:</i> Name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.</p>	Yes	Yes	No
<p>B. Categories of Personal Information in Cal. Civ. Code Section 1798.80(e)</p> <p><i>Examples:</i> 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.</p>	Yes	Yes	No
<p>C. Characteristics of Protected Classifications under California or Federal Law</p> <p><i>Examples:</i> Race or color, ancestry or national origin, religion or creed, age (over 40), mental or physical disability, sex (including gender and pregnancy, childbirth, breastfeeding or related medical conditions), sexual orientation, gender identity or expression, medical condition, genetic information, marital status, military, and veteran status.</p>	Yes	Yes	No
<p>D. Commercial Information</p> <p><i>Examples:</i> Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	Yes	Yes	No

<p>E. Biometric Information</p> <p><i>Examples:</i> Physiological, biological, or behavioral characteristics, including DNA, that can be used, singly or in combination with each other or with other identifying data, to establish individual identity, such as imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.</p>	No	N/A	N/A
<p>F. Internet or Other Electronic Network Activity Information</p> <p><i>Examples:</i> Browsing history, search history, and information regarding a consumer’s interaction with an internet website, application or advertisement.</p>	Yes	Yes	No
<p>G. Geolocation Data</p> <p><i>Example:</i> Precise physical location.</p>	Yes	Yes	No
<p>H. Sensory Information</p> <p><i>Examples:</i> Audio, electronic, visual, thermal, olfactory, or similar information.</p>	No	N/A	N/A
<p>I. Professional or Employment-Related Information</p> <p><i>Examples:</i> Job application or resume information, past and current job history, and job performance information.</p>	Yes	Yes	No

<p>J. Non-Public Education Information (as defined in 20 U.S.C. 1232g; 34 C.F.R. Part 99)</p> <p><i>Examples:</i> Records that are directly related to a student maintained by an educational agency or institution or by a party acting for the agency or institution.</p>	No	N/A	N/A
<p>K. Inferences Drawn from Personal Information</p> <p><i>Examples:</i> Consumer profiles reflecting a consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p>	Yes	Yes	No

2. USE OF PERSONAL INFORMATION

We use the Personal information we collect:

- To provide, maintain, improve, and enhance our Services.
- To communicate with you, provide you with updates and other information relating to our Services, provide information that you request, respond to comments and questions, and otherwise provide customer service and support.
- For marketing purposes, such as developing and providing promotional and advertising materials that may be useful, relevant, valuable, or otherwise of interest to you, to market events, promotions, competitions, webinars, reports, our services, news or relevant industry updates.
- To personalize your experience on our Services such as presenting tailored content.
- To conduct research to understand and analyze how you use our Services and develop new products, services, and features.
- To process job applications.
- To process your submissions, including to become our Client or partner, join the Andela Learning Community, to download e-books, or attend webinars or events.
- To find and prevent fraud and respond to trust and safety issues that may arise.
- For compliance purposes, including enforcing our legal rights, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency.
- For other purposes for which we provide specific notice at the time the Personal Information is collected.

3. COLLECTION OF PERSONAL INFORMATION

In the preceding twelve months since this notice was last updated, we have collected Personal Information from the following categories of sources:

- You or your devices directly.
- Other users of our services.
- Affiliates.
- Advertising networks.
- Internet service providers.
- Analytics providers.
- Government entities.
- Operating systems and platforms.
- Social networks.
- Consumer data brokers.
- Business partners.
- Publicly accessible sources.

4. DISCLOSURE OF PERSONAL INFORMATION

In the preceding twelve months since this notice was last updated, we disclosed Personal Information to the following categories of third parties:

Analytics Providers. Personal Information we share: Identifiers, Categories of Personal Information in Cal. Civ. Code Section 1798.80(e), Commercial Information, Characteristics of Protected Classifications under California or Federal Law, Internet or Other Electronic Network Activity Information, Geolocation Data, Professional or Employment-Related Information, and Inferences Drawn from Personal Information.

Vendors and Service Providers. Personal Information we share: Identifiers, Categories of Personal Information in Cal. Civ. Code Section 1798.80(e), Commercial Information, Characteristics of Protected Classifications under California or Federal Law, Internet or Other Electronic Network Activity Information, Geolocation Data, Professional or Employment-Related Information, and Inferences Drawn from Personal Information.

Third Parties as Legally Required. Personal Information we share: Identifiers, Categories of Personal Information in Cal. Civ. Code Section 1798.80(e), Commercial Information, Characteristics of Protected Classifications under California or Federal Law, Internet or Other Electronic Network Activity Information, Geolocation Data, Professional or Employment-Related Information, and Inferences Drawn from Personal Information.

Third Parties in Connection With a Merger/Acquisition. Personal Information we share: Personal Information we share: Identifiers, Categories of Personal Information in Cal. Civ. Code Section 1798.80(e), Commercial Information, Characteristics of Protected Classifications under California or Federal Law, Internet or Other Electronic Network Activity Information, Geolocation Data, Professional or Employment-Related Information, and Inferences Drawn from Personal Information.

Third Parties with Consent. Personal Information we share: Identifiers, Categories of Personal Information in Cal. Civ. Code Section 1798.80(e), Commercial Information, Characteristics of Protected Classifications under California or Federal Law, Internet or Other Electronic Network Activity Information, Geolocation Data, Professional or Employment-Related Information, and Inferences Drawn from Personal Information.

5. YOUR CALIFORNIA PRIVACY RIGHTS

If you are a California resident, you may exercise the following rights.

Right to Know and Access. You may submit a verifiable request for information regarding the: (1) categories of Personal Information collected, sold, or disclosed by us; (2) purposes for which categories of Personal Information are collected or sold by us; (3) categories of sources from which we collect Personal Information; (4) categories of third parties with whom we disclosed or sold Personal Information; and (5) specific pieces of Personal Information we have collected about you during the past twelve months.

Right to Delete. Subject to certain exceptions, you may submit a verifiable request that we delete Personal Information about you that we have collected from you.

Verification. Requests for access to or deletion of Personal Information are subject to our ability to reasonably verify your identity in light of the information requested and pursuant to relevant CCPA requirements, limitations, and regulations. To verify your access or deletion request, please provide us with your name, email address, and phone number associated with your account, and we will let you know if we need any additional information to verify your request.

Right to Opt Out. In some circumstances, you may opt-out of the sale of your Personal Information. We do not sell your Personal Information.

Right to Equal Service and Price. You have the right not to receive discriminatory treatment for the exercise of your CCPA privacy rights, subject to certain limitations.

Shine the Light. You may request information once per calendar year about our disclosures of certain categories of Personal Information to third parties for their direct marketing purposes. Such requests must be submitted to us in writing using the Contact Information section below.

Submit Requests. To exercise your rights under the CCPA, please email us at privacy@andela.com or legal@andela.com.

Authorizing an Agent. If you are acting as an authorized agent to make a request to know, delete, or opt out on behalf of a California resident, please email us at privacy@andela.com and attach a written authorization signed by the resident.

6. DO NOT TRACK

There is no accepted standard on how to respond to Do Not Track signals, and we do not respond to such signals.

7. CONTACT US

We welcome feedback from all our Users and if you have any questions regarding this California Resident Privacy Notice or the use of your Personal Information please contact us. You can email our privacy officer at privacy@andela.com or you can send mail to us at:

Andela Inc.

Attn: Privacy Officer
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New York, NY 10036
United States
