

PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

Last Updated: 23 December 2022

This **PRIVACY NOTICE FOR CALIFORNIA RESIDENTS** supplements the information contained in [the Privacy Notice](#) of LUXOFT and its affiliates (collectively, “we,” “us,” or “our”) and applies solely to the residents of the State of California (“consumers” or “you” or “your”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”), as amended and including any implementing regulations, and other California privacy laws. Any terms defined in the CCPA will have the same meaning when used in this notice.

Please note that certain exemptions apply to your rights and our obligations pursuant to the CCPA. These rights and requirements may not apply in certain situations depending on your relationship with us or our other legal obligations.

We reserve the right to amend this this Privacy Notice for California Residents at our discretion and at any time. When we make changes to this this Privacy Notice for California Residents, we will post the updated notice on our website and update the notice’s “Last Updated” date.

Personal Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“**personal information**”). In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

- **Identifiers**, such as real name, alias, postal address, unique personal identifier, online identifier, internet protocol (IP) address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.
- **Non-Public Personal Information, as defined in Cal. Civ. Code § 1798.80(e)**, such as 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. Please note that some personal information included in this category may overlap with other categories.
- **Characteristics of Protected Classifications**, such as age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex, sexual orientation, veteran or military status, or genetic information.
- **Internet Activity Information**, such as browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.
- **Geolocation Data**, such as general physical location.
- **Professional or Employment-Related Information**, such as current or past job history or performance evaluations.

Where We Get Your Personal Information

We will collect the personal information described above from one or more of the below sources:

- Directly from you throughout our relationship, including when you complete forms and applications, sign up and/or use our services and websites, or when you visit our offices or attend our events.
- Indirectly from you, for example, from how you interact with our website.
- From our parent entities, affiliates, subsidiaries and other business partners.
- From other companies authorized to share your personal information with us, for example, from our clients provide in relation to the services for which they engage us.

Use and Disclosure of Personal Information

We may use or disclose your personal information for one or more of the following business or commercial purposes:

- To fulfill or meet the purpose described to you when collecting your personal information.
- To provide you with information or services that you request from us.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us.
- To improve our website, products or services and to develop and manage our brand.
- To manage our relationship with you or your business.
- To develop and carry out marketing activities in order to keep our clients informed about our products and services.
- To help maintain the safety, security, and integrity of our websites, software, systems, networks, products, services, databases, other technology assets, and business.
- As necessary or appropriate to protect the rights, property or safety of us, our employees or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To evaluate or conduct 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 held by us is among the assets transferred.
- As described to you when collecting your personal information or as otherwise permitted by the CCPA.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

- Identifiers.
- Non-Public Personal Information, as defined in Cal. Civ. Code § 1798.80(e).
- Characteristics of Protected Classifications.
- Internet Activity Information.
- Geolocation Data.
- Professional or Employment-Related Information.

- We disclose your personal information for a business purpose to the following categories of companies:
- Our parent entities, affiliates and subsidiaries.
- Service providers who help manage, develop and analyze our business and/or deliver services to us and our clients. These service providers have agreed to confidentiality restrictions and use any personal information we share with them or which they collect on our behalf solely for the purpose of providing the contracted service to us.
- Any company or person that you or your agent authorizes us to disclose your personal information to.
- Internet cookie information recipients including [Google](#), [Facebook](#), [LinkedIn](#), [YouTube](#) and [Twitter](#) (as laid out in [our Privacy Notice](#); additionally you can click on each respective link to see that party's privacy policy).

No Sale or Sharing of Personal Information

In the past 12 months, we have not “sold” or “shared” your personal information as we understand those terms to be defined by the CCPA and its implementing regulations.

Retention of Your Personal Information

As a rule, we will only store your personal information on our servers, and on the servers of the cloud-based database management services the Luxoft Group engages for as long as is necessary to achieve the purposes set out in this Privacy Notice for California Residents or [our Privacy Notice](#). Personal information that we are processing based on your consent will be kept until the consent is revoked, unless otherwise prescribed by applicable legal requirements and presuming that it is necessary for the purpose of processing. We delete or anonymise your personal information after the processing purpose is fulfilled or if you revoke your consent, unless applicable legal requirements require or enable us to further store your personal data.

Further retainment of information and documents (including electronic documents) containing personal information can be required:

- to the extent that we are required to do so by law to fulfil statutory retention and documentation obligations (e.g. for accounting, book-keeping and tax purposes); and
- if the information/documents are relevant to establish, exercise or defend our legal rights any ongoing or prospective legal proceedings (for the duration of the longest applicable statute of limitation periods)

With regard to the use and retention period of cookies, please see the cookie section in [our Privacy Notice](#). In addition to the Blocking Cookies and Deleting Cookies session therein, please note that you may be able to change your web browser settings, including “Do Not Track” settings, which may turn off certain cookies based on the browser's capabilities.

Access to Specific Information and Data Portability Rights

You have the right to request that we 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 about you.

- The categories of sources for the personal information we collected about you.
- The business or commercial purpose for collecting that personal information.
- The categories of vendors with whom we share that personal information.
- The specific pieces of personal information we collected about you.

Deletion and Correction Request Rights

You have the right to request that we delete or correct any of your personal information that we collected from you and retained. However, we may retain personal information as authorized under applicable law. For example, we need certain types of personal information so that we can provide our services. If you ask us to delete it, you may no longer be able to access or use our services.

Exercising Your Privacy Rights

To exercise the privacy rights described above, please submit your request through one of the following methods:

- Toll-free line: +1-888-589-6386
- Email: dpo@luxoft.com

Your request must:

- Provide sufficient information to allow us to verify that you are the person about whom we collected personal information. At a minimum, please provide us with your full name and contact information for correspondence with you. If your initial request does not contain sufficient information, we may request that you provide us with at least two or more pieces of personal information to match against personal information about you that we may or may not maintain and which we have determined to be reliable for the purpose of verification.
- Give us sufficient detail to allow 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 relates to you. Making a request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Authorized Agent

Only you, or a person you have designated in writing as your authorized agent, or whom is registered with the California Secretary of State to act on your behalf, or whom you have provided power of attorney pursuant to California Probate Code sections 4000 to 4465, ("Authorized Agent"), may make a consumer request related to your personal information. You may also make a request on behalf of your minor child.

If you wish to have an Authorized Agent make a request on your behalf, they will need to provide us with sufficient written proof that you have designated them as your Authorized Agent and we will still require you to provide sufficient information to allow us to reasonably verify that you are the person about whom we collected personal information.

Non-Discrimination

You have the right not to be discriminated against for exercising any of your CCPA rights. We will not discriminate against you for exercising your CCPA rights.

Contact Information

If you have any questions or comments about this Privacy Notice for California Residents, [our Privacy Notice](#), the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, or need to receive any of our privacy notices in another format, please do not hesitate to contact us at:

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