## **California Consumer Privacy Act**

Under the CCPA, if you're a California resident you have the right to know not only what categories of "personal information" we collect, disclose or sell generally; but also what personal information we collect, disclose, or sell about you. (California law has a really detailed definition of "personal information" here.).

We're pleased to report that we don't collect any "personal information" about anyone – and thus not about you either. All the information we collect, as described in our privacy policy, is deidentified so it doesn't qualify as "personal information." We haven't disclosed or sold any personal information to any third parties. The only exceptions, also described in our privacy policy, are on occasion when we have an event such as a contest or Secret Santa, in which case disclosure to us of your personal information is always voluntary, and of course we make the necessary disclosures and explanations regarding what we collect and how we use it and protect it separately, as part of the particular event.

Our site is not directed at children under age 16, and we certainly would not sell or disclose the personal information of anyone we know is under age 16, even if we had it, without affirmative authorization as required by the CCPA and the regulations.

Even though we don't collect personal information, you still have a right to submit what the CCPA calls a "verifiable consumer request," to confirm the above, a request to opt-out of information collection, and/or a request to delete any personal information we may have about you. We have a form you can use for any of those purposes here. We authenticate the request – that is, make sure it's you and not someone else – by requiring you to log into Imgur with your username and password. If you decide to use what the CCPA calls

https://imgur.com/ccpa Page 1 of 6

an "authorized agent" to submit your request, your agent must use your username and password since that's the only means we have to authenticate.

The CCPA prohibits us from discriminating against you in any way for exercising your rights as described above, and of course we won't.

Since we're required to track and annually report statistics regarding the number of requests we receive, here's our report for 2021:

108 requests received

108 responses provided

Median time to respond = 1 day

Here's how the CCPA defines "personal information":

"Personal information" means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

("Household" is defined by the CCPA regulations as "a person or group of people occupying a single dwelling.")

Personal information includes, but is not limited to, the following if it identifies, relates to, describes, is capable of being associated with, or could be reasonably linked, directly or indirectly, with a particular consumer or household:

https://imgur.com/ccpa Page 2 of 6

(A) Identifiers such as a real 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.

(B) Any categories of personal information described in subdivision (e) of Section 1798.80.

[Section 1798.80 states: "'Personal information' means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her 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. 'Personal information' does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records."]

- (C) Characteristics of protected classifications under California or federal law.
- (D) Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- (E) Biometric information.
- (F) Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.

https://imgur.com/ccpa

- (G) Geolocation data.
- (H) Audio, electronic, visual, thermal, olfactory, or similar information. (I) Professional or employment-related information.
- (J) Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. §1232g and 34 C.F.R. Part 99).
- (K) Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

The CCPA also excludes some things from the definition of "personal information":

- Publicly available information
- Aggregate consumer information
- Deidentified information

The CCPA defines those as follows:

For these purposes, "publicly available" means information that is lawfully made available from federal, state, or local government records, if any conditions associated with such information. "Publicly available" does not mean biometric information collected by a business about a consumer without the consumer's knowledge. Information is not "publicly available" if that data is used for a purpose that is not compatible with the purpose for which the data

https://imgur.com/ccpa

is maintained and made available in the government records or for which it is publicly maintained. "Publicly available" does not include consumer information that is deidentified or aggregate consumer information.

"Aggregate consumer information" means information that relates to a group or category of consumers, from which individual consumer identities have been removed, that is not linked or reasonably linkable to any consumer or household, including via a device. "Aggregate consumer information" does not mean one or more individual consumer records that have been deidentified.

"Deidentified information" means information that cannot reasonably identify, relate to, describe, be capable of being associated with, or be linked, directly or indirectly, to a particular consumer, provided that a business that uses deidentified information: (1) Has implemented technical safeguards that prohibit reidentification of the consumer to whom the information may pertain. (2) Has implemented business processes that specifically prohibit reidentification of the information. (3) Has implemented business processes to prevent inadvertent release of deidentified information. (4) Makes no attempt to reidentify the information.

Print Imgur's California Consumer Privacy Act Policy

Do Not Sell My Info 💯

Although you are free to submit an opt-out request, there is nothing to opt-out of since we do not sell your personal information. Complete this form or email ccpa@imgur.com.

The CCPA requires that we verify that you are in fact the user who is submitting this form. To accomplish that, you'll need to login, then

https://imgur.com/ccpa Page 5 of 6

submit our opt-out request form. Please visit this page from the desktop site to log in.

https://imgur.com/ccpa Page 6 of 6