

CCPA Privacy Notice for California Residents

International SOS Privacy Notice for California Residents

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Last Reviewed on: 13 12 2019

This **Privacy Notice for California Residents** supplements the information contained in the International SOS Group of Companies' ("International SOS") [General Privacy & Cookies Notice](#) and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this notice.

Information We Collect

The Intl.SOS Group of Companies 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 device ("**personal information**") when you use one of our services. In particular, International SOS has collected the following categories of personal information from its consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	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.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A 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. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	YES

F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	YES
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	YES
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

International SOS obtains the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, when you buy, use or benefit from International SOS' services or products or apply for a job with International SOS.
- Indirectly from you. For example, from information provided by the company or institution who purchased a membership in International SOS on your behalf, such as your employer or scholastic institution, your insurance company, other assistance companies, financial institutions, medical services providers and travel agencies.
- If you contact one of our International SOS Group Affiliates' Assistance Centers, an Aspire Lifestyles concierge, a MedAire Global Response Center or visit an International SOS Group affiliated clinic, or use our Assistance applications.

Please see <https://www.internationalsos.com/privacy> for more information about how we use your personal information in connection with each of our services.

Use of Personal Information

We may use, or disclose the personal information we collect for one or more of the following purposes and 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:

- :
- To fulfill the purpose for which you provided the information. For example, if you share your name and contact information to request travel assistance or medical assistance while travelling abroad or when you ask a question about our products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a product or service, we will use that information to process your payment and facilitate delivery.
 - To provide, support, personalize, and develop our Website, products, and services.
 - To create, maintain, customize, and secure your account with us.
 - To process your requests, purchases, transactions, and payments and prevent transactional fraud.
 - To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
 - To personalize your Website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Website, third-party sites, and via email or text message (with your consent, where required by law).
 - To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
 - For testing, research, analysis, and product development, including to develop and improve our Website, products, and services.
 - To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
 - As described to you when collecting your personal information or as otherwise set forth in the CCPA.
 - To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of an affiliate of the International SOS Group's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by International SOS about our Website users is among the assets transferred.

Sharing Personal Information

International SOS may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We share your personal information with the following categories of third parties:

- Service providers.
- Data aggregators.
- Data processors.
- International SOS Group affiliates.
- The institution that enrolled you in an International SOS Membership or arranged for an International SOS service to be provided to you.

Disclosures of Personal Information for a Business Purpose

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

Category A: Identifiers.

Category B: California Customer Records personal information categories.

Category C: Protected classification characteristics under California or federal law.

Category D: Commercial Information.

Category E: Biometric information.

Category F: Internet or other similar network activity.

Category G: Geolocation data.

Category H: Sensory data.

Category J: Non-public education information.

We disclose your personal information for a business purpose to the following categories of third parties:

- Service providers.
- Data aggregators
- Data processors.
- International SOS Group Affiliates.
- The institution that enrolled you in an International SOS Membership or arranged for an International SOS, Aspire Lifestyles or Med Aire service to be provided to you.

Sales of Personal Information

We do not sell your personal information to any third parties.

In the preceding twelve (12) months, International SOS Group Companies have not sold any personal information, such as:

A. Identifiers.

B. California Customer Records personal information categories.

C. Protected classification characteristics under California or federal law.

D. Commercial information.

E. Biometric information.

F. Internet or other similar network activity.

G. Geolocation data.

H. Sensory data.

I. Professional or employment-related information.

J. Non-public education information.

K. Inferences drawn from other personal information.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that any International SOS Group Company 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 (see Exercising Access, Data Portability, and Deletion Rights), 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.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Request Rights

You have the right to request that an International SOS Group Company delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will delete (and direct our service providers/data processors to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Using our [Data Subject Rights Portal](#).
- Contacting your employing organization, scholastic institution or credit card issuer (Aspire Lifestyles only).

- Directing your concerns to our Chief Privacy Officer at dpo@internationalsos.com

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows 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 verifiable consumer request does not require you to create an account with us.
- However, we do consider requests made through your password protected account sufficiently verified when the request relates to personal information associated with that specific account. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.
- For instructions on exercising sale opt-out rights, see Personal Information Sales Opt-Out Rights.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within thirty (30) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.

If you are a member with us, we will deliver our written response to you as a member. If you do not have membership with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance, specifically a Microsoft Word document or Adobe PDF.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Personal Information Sales Opt-Out and Opt-In Rights

If you are 16 years of age or older, you have the right to direct us to not sell your personal information at any time (the "right to opt-out"). We do not sell the personal information of consumers whether or not we actually know are less than 16 years of age. As is required by CCPA, we are offering you the ability to exercise the right to opt-out **even though we will not sell your personal information**. You (or your authorized representative) may submit a request to us by visiting the following Internet

Web page link:

[Do Not Sell My Personal Information](#)

You do not need to create an account with us to exercise your opt-out rights. We will only use personal information provided in an opt-out request to review and comply with the request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
 - Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
 - Provide you a different level or quality of goods or services.
 - Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.
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Other California Privacy Rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to dpo@internationalsos.com

Changes to Our Privacy Notice

International SOS reserves the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice's effective date. **Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.**

Contact Information

If you have any questions or comments about this notice, the ways in which International SOS collects and uses your information described below and in the **Privacy Policy**, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Website: www.internationalsos.com/privacy

Email: privacy@internationalsos.com
