

**PRIVACY STATEMENT – CALIFORNIA**

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS supplements the information contained in the Privacy Statement of Vocational Training Institutes, Inc., an Arizona corporation dba Pima Medical Institute (collectively, “we,” “us,” “our,” or “Pima”) and applies solely to visitors, users and others who reside in the State of California (“consumers” or “you”). Pima adopts this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice.

**Information We Collect**

Pima collects 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”). Pima has collected the following categories of Personal Information from consumers within the last twelve (12) months:

Category	Examples
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.
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 the other categories.
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).
D. Commercial information.	Records of personal property, products or educational services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
E. Internet or other similar network activity.	Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.
F. Geolocation data.	Physical location or movements.
G. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.
H. Professional or employment-related information.	Current or past job history or performance evaluations.
I. Non-public education information (per the	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades,

Family Educational Rights and Privacy Act (20 U.S.C. § 1232g, 34 C.F.R. Part 99)).	transcript, classless, student schedules, student identification codes, student financial information, or student disciplinary records.
J. Inferences drawn from other Personal Information.	Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Personal Information does not include:

- Publicly available information from governmental 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

We obtain the categories of Personal Information listed above from the following categories of sources:

- Directly from our applicants and students. For example, from documents that our applicants and students provide to us related to the educational services they seek from us.
- Indirectly from our applicants and students or their agents. For example, through information we collect from third parties concerning our applicants’ and students’ educational histories.
- Directly and indirectly from activity on our website. For example, from submissions through our website portal or website usage details collected automatically.
- From third parties that interact with us in connection with the educational services we provide. For example, from governmental agencies which assist in funding our students’ educational costs.

**Use of Personal Information**

Pima may use or disclose the Personal Information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided. For example, if you provide information in an enrollment application or a financial aid application, we will use the information to decide whether you can enroll at Pima and, if so, whether and how much financial aid we can provide.)
- To provide you with information about the educational services that you request from us.
- To provide you with email alerts, event registrations and other notices concerning our educational services, or events or news, that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and Pima, including for billing and collections.

- To improve our website and present its contents to you.
- For testing, research, analysis and product development.
- As necessary or appropriate to protect the rights, property or safety of us, our applicants and students, or others.
- 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 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.

Pima will not collect additional categories of Personal Information or use the Personal Information collected from materially different, unrelated, or incompatible purposes without providing you notice.

### **Sharing Personal Information**

Pima may disclose your Personal Information to third party for a business purpose. When we disclose Personal Information for a business purpose, we enter into 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.

In the preceding 12 months we have disclosed the categories of Personal Information listed in this Notice for business purposes.

Pima disclosed your Personal Information for a business purpose to the following categories of third parties:

- Our affiliates.
- Our service providers.
- Third parties to whom you or your agents authorize us to disclose your Personal Information in connection with the educational services we provide to you.

***In the preceding 12 months we have not sold any Personal Information for money or other direct economic value.***

### **Rights of Minors**

Pima has special obligations to individuals who have not yet reached their 17<sup>th</sup> birthday. If you have not reached your 13<sup>th</sup> birthday, Pima cannot sell your Personal Information unless your parent or guardian has affirmatively authorized the sale of your Personal Information. If you have reached your 13<sup>th</sup> birthday, but have not yet reached your 16<sup>th</sup> birthday, Pima cannot sell your Personal Information unless you or your parent or guardian has affirmatively authorized the sale of your 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 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 collected about you.
- The categories or of sources for the Personal Information collected about you.
- Our business or commercial purpose for collecting or selling that Personal Information.
- The category 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 business purpose, two separate lists disclosing:
  - sales, identifying the Personal Information categories each category recipient purchased; and
  - disclosures for a business purpose, identifying the Personal Information categories that each category recipient obtained.

### *Deletion Request Rights*

You have the right to request that we delete any of your Personal Information we collected from you and retained, subject to certain section exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies.

Pima may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. 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.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the rights the right of another consumer to exercise their free speech rights, or exercise in other right provided for by law.
5. Comply with the California Electronic and Communications Privacy Act (Cal. Penal Code § 1546 *et seq.*)
6. 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.

7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. 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:

- **Calling us at 844.998.2272 (CCPA)**
- **Emailing us at [ccpa@pmi.edu](mailto:ccpa@pmi.edu)**

Only you or a person registered with the California Secretary of State that you 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 details that allows us to properly understand, evaluate and respond to it.

Pima cannot respond to your request or provide you with Personal Information if we cannot identify 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. We will only use Personal Information provided in a verifiable consumer request to verify the requester's identity or authority to make the request.

### ***Response Timing and Format***

Pima endeavors to respond to a verified consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason an extension in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or at the electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer requests receipt. The response we provide will also explain the reasons we cannot comply with the request, if applicable. For data portability request, we will select a format to provide your Personal Information that is readily usable and should allow you to transmit the information from one entity to another entity without hindrance.

Pima does 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.

### **Non-Discrimination**

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

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

### **Changes to Our Privacy Notice**

Pima 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 notify you by email or through a notice on our website homepage.