

SACRAMENTO ASIAN-PACIFIC CHAMBER OF COMMERCE PRIVACY POLICY

Effective Date: December 9, 2024

This website is owned and operated by Sacramento Asian-Pacific Chamber of Commerce (the "Chamber", "**we**", or "**us**"), a California nonprofit public benefit corporation. We are committed to protect the privacy, confidentiality, and security of the Personal Information (defined below) that we receive. We take your privacy and your trust in us very seriously. This Privacy Policy describes the principles and practices that apply to the Personal Information that we collect from individuals online or offline ("**you**"), such as individuals who browse through our Sites (defined below), register on the Site, use the services provided on the Sites, interact with the Sites, communicate with us through telephone, email, text, or other communications means, participate in our interviews, surveys, or promotions, read or receive our newsletters, or apply for employment with us.

About This Privacy Policy

This Privacy Policy applies when you visit or use our Sites, apps and Products or Services. This Privacy Policy may be supplemented by additional privacy statements, terms or notices provided to you. We will indicate within the registration processes of our Products or Services and other registration forms what types of Personal Information are required and those that are requested. You may choose not to submit the requested information, but that may limit or prohibit the services that the Chamber is able to provide to you.

Definitions

In this Privacy Policy, the following terms are defined as set forth in this section:

- "**Assessment**" means an instrument and/or questionnaire that are completed by one or more Respondents to provide information about a Respondent to the Respondent, to the Chamber and the Chamber's Customer(s), usually with the aim of generating one or more Reports.
- "**Child**" or "**Children**" means those individuals who are (i) in the United States and under age 13; (ii) in the European Union and under age 16; or (iii) in other countries or territories and under the minimum age of threshold to be considered an adult.
- "**Customer**" means an individual, business, or other entity that purchases the Chamber's Products or Services, or with which the Chamber has a contractual relationship to provide Products or Services, including but not limited to the obligation to provide such Products or Services arising out of membership in the Chamber. Customer includes members of the Chamber and/or affiliated organizations to the Chamber.
- "**Personal Information**" means any information, recorded in any form, about an identified individual, or an individual whose identity may be inferred from the information. Personal Information includes, for example, name, email address, mailing address, telephone number, billing information, account information, and other information incidental to providing or receiving Products or Services or which you may choose to provide to the Chamber. It also includes other information, such as IP address, device information, or other Session Data (as defined below) that can reasonably be linked to a specific individual, computer, or other device.
- "**Products or Services**" means the products or services promoted, sold, available for sale, or available for use on the Sites, including but not limited to our Assessments, Reports, and other supplemental materials.

- **“Reports”** means an analysis of the scoring and responses provided in connection with an Assessment, which a Customer may use to interpret a Respondent’s responses to an Assessment.
- **“Respondent”** means an individual who takes, will take, or has taken an Assessment.
- **“Session Data”** means, as applicable, usage information, such as IP address, unique identifier of an individual’s mobile device, the type of browser, type of operating system, referring URL, date, time and duration of a visitor’s visit, the number of visits to a Site, the pages viewed, order of pages viewed, time spent on a particular page, the number of cookies accumulated, bytes sent, bytes received, protocol version, user agent, method, URI stem, URI query, or MAC address.
- **“Site”** means any websites or applications that we may develop or have developed from time-to-time and includes, without limitation: <https://calasiancc.org/>.

Your Agreement to this Privacy Policy

By creating an account, using the Site(s), and/or submitting Personal Information to us, you agree to the practices described in this Privacy Policy, and you agree that we may collect, use, disclose, store, transmit, and/or process such Personal Information in accordance with this Privacy Policy or as required by law.

If you reside in a country or territory that restricts the transfer of Personal Information out of that country or territory, you agree to the transfer, storage, and processing of your Personal Information to countries that may not have data protection laws that provide the same level of protection as those that exist in your country of residence.

Children are not permitted to use the Sites. Should we discover that a Child has sent Personal Information directly to us, we will use that information only to respond directly to that Child to inform him/her that we will not continue to process his/her Personal Information.

Links to External Sites

The Sites may link to websites that are operated by third parties. Because such websites are not operated by the Chamber, they are not subject to this Privacy Policy. We recommend that you read the privacy statements that are posted on these third-party websites to understand their procedures for collecting, using, and disclosing Personal Information.

What Personal Information We Collect and How

We collect only such Personal Information as necessary to (i) provide our Products or Services to you; (ii) inform you about our Products or Services; (iii) continue our research in the field; and (iv) improve our Sites, Products or Services, and your experience interacting with us. We describe below the different ways in which we collect or obtain Personal Information. Unless otherwise stated below, the legal basis for our processing of your Personal Information is our legitimate business interest in (i) providing the Sites, Products, or Services to you; or (ii) contacting or considering you as a candidate for employment with us.

While the Chamber may disclose your Personal Information for the business purposes set forth below, the Chamber does not sell your Personal Information to third parties.

If you visit the Sites—If you visit the Sites, we automatically collect the related Session Data. Session Data is provided to us by your browser, by third-party integrations on our Sites, and through our log files, which record your activities while browsing our Sites, such as when you click on a link. We may record some of this data in one or more cookies that we send to your

browser (see “**Cookies and Other Technologies**”)

If you register or create an account—If you register or create an account, we require that you provide certain Personal Information during account registration. We collect your name, email address, contact information, and other information, and may ask you for other optional information that helps us serve you better.

If you complete an Assessment—If a Respondent completes an Assessment, we collect the Respondent’s name, email address, contact information, Assessment responses, Session Data, and other information you may choose to provide or associate with your account. In some cases, we ask questions to which the response is optional (such as demographic questions), and these questions are identified as such. In some instances, these optional demographic questions may involve collection of special categories of Personal Information, such as information regarding your racial or ethnic origin. We collect this optional demographic data in order to produce statistics of the type described in our technical product manuals, and to produce validity data to statistically evaluate the fairness, validity, and reliability of our Assessments. This information assists in ensuring our Assessments remain ethical and neutral, and are fair in terms of differing nationalities, races, and cultures, in support of our commitments to diversity, equity, and inclusion. You are free not to respond to these optional questions. For all optional questions, our legal basis for processing your Personal Information is your explicit, informed consent.

If you participate in a survey—If you choose to participate in one of our surveys, we may collect Personal Information such as your name, email address, and any other Personal Information that you may provide in your survey responses. Participation in surveys is optional, and we give you the ability to opt out of being contacted for surveys at any time.

If you sign up to receive marketing communications—If you sign up to receive our marketing communications, we may collect information on the open rate of the communications, and whether a specific individual has clicked on a link contained in a particular communication. Our marketing communications contain instructions on how to opt out of receiving future marketing communications if you no longer wish to receive them.

If you are a Customer or other business contact—If you are a Customer or other business contact, or if you are an employee or agent of a Customer or business contact, we may collect your name, email address, telephone number, and other contact information in the regular course of our interaction with you. We may obtain Personal Information about you from the organization with which you are employed or affiliated if such organization is a Customer - in order to activate and manage your access to and use of the organization’s subscription to the Products or Services, including: contact details, such as your name and organizational email address, postal address, and phone number; and/or other account registration information such as job title.

If you interact with third parties regarding our Products or Services—We may receive Personal Information about you from third parties, such as from Customers, websites where we advertise, business partners, and service providers. Some of this information pertains to a specific individual; other information can only be linked to an access point or a device.

If you use our mobile application—We may collect certain additional Personal Information from you, including your location information. We may also collect Personal Information relating

to your third-party contacts, including any additional information you choose to add regarding such contacts, but only if you choose to make use of the app's feature(s) that require or utilize this information.

If you participate in our virtual training programs—We may use Session Data to monitor and limit the registration and attendance of participants in the program.

How We Use Personal Information

We use Personal Information in order to provide and enhance the Products or Services that we offer as explained below:

To improve our Products or Services—We use Personal Information to provide Products or Services, and for analytics, market research and business development, including to operate and improve our Sites, our Products or Services, associated applications and associated social media platforms.

To facilitate the use of the Sites—We use Session Data to ease navigation throughout the Sites, to enhance navigation, keep track of login name and password in order to avoid requesting identity information when the visitor moves from page to page, and in general to enhance the quality of our Sites and the content provided on the Sites.

In connection with Assessments—We use the responses to Assessments to score the Assessments and to generate Reports and other data related to the Respondents to those Assessments. We sometimes combine data from multiple Respondents (for example, in team reports). We may also combine Respondent data with our general research data, or compare or associate Respondent data with other Respondent data. Certain subsets of this data are made available to our Customers, but your Personal Information is only shared with a Customer if you complete an Assessment that has been sponsored by that Customer.

For research purposes—We may use aggregated Session Data to better understand how our Sites are navigated, how many visitors arrive at specific pages, which pages or content attract more viewers, the length and frequency of stays at our Sites, the different types of searches of our Sites' content and databases, the types of browsers and computer operating systems that our visitors use, and the IP addresses from which visitors connect to our Sites, in order to improve our Sites and enhance our content. We may use IP addresses to gather broad demographic information—information that is not associated with any individual, and is therefore anonymous. We also use aggregated Assessment responses, demographic data, and other data to improve our Products or Services. We may use location information gathered from our mobile application(s) for research and development purposes.

For maintenance purposes—We may use IP addresses and Session Data to diagnose problems with our server, and to administer our Sites.

For marketing purposes—We may use email addresses or other contact information to send mailings, newsletters, and other marketing communications regarding product information and releases. We may use your telephone number to contact you for marketing purposes. We may use pixel tags to monitor the open rate of our communications. This helps us understand the effectiveness of the communications that we send. We give you the ability to opt out of marketing communications at any time.

For survey analysis—The information that we collect through our surveys is not used other

than to garner survey results and statistical analysis.

To Whom We Disclose Personal Information

From time to time, we may disclose Personal Information to someone other than the individual who provided the Personal Information, as further described below:

Customers—The Chamber provides certain Customers with the information that they need to properly administer or interpret Assessments and/or Reports. If you take an Assessment at the direction of one of our Customers, that Customer will receive from the Chamber copies of the completed Assessments and one or more Reports based on the Assessment you took and the responses you provided to that Assessment.

Service providers—We may engage certain third parties to perform functions and provide services to us, including, without limitation, Customer relationship management, contract management, order fulfillment, mass mailing, hosting and maintenance, database storage and management, business analytics, and direct marketing campaigns. As of the effective date of this Privacy Policy, the current list of service providers to whom we disclose Personal Information is as follows:

- financial institutions;
- payments processors;
- support ticketing system providers such as ZenDesk;
- customer relationship management providers such as Salesforce;
- fraud detection providers;
- data room or data transfer providers; and
- cloud hosting providers.

Pursuant to written agreements between the Chamber and these service providers, each of these service providers only has access to such Personal Information as necessary to fulfill its obligation to the Chamber, is not permitted to use Personal Information for any purposes other than those directed by the Chamber, and is required to act in a manner consistent with the privacy principles articulated in this Privacy Policy and applicable law.

To defend or enforce our rights—The Chamber may use Personal Information to protect itself or to protect the Sites, to respond to a breach of its Terms of Service (or other applicable legal terms), to prevent fraudulent activity, or where it is necessary to pursue available remedies. If a Customer neglects to pay amounts due and owing to the Chamber, the Chamber may send that Customer's name, contact information, and account information to a third-party service provider for collection of overdue payments.

Co-Marketing Partners—We may collaborate with other companies to offer you additional Products or Services. We may share Personal Information that is necessary for these other companies to provide the Products or Services that you have requested. This Privacy Policy does not cover the use of your Personal Information by these companies. We encourage you to read a company's Privacy Policy before requesting any affected Products or Services.

Mergers & Acquisition; Bankruptcy—If any or all of the Chamber's assets are acquired by or merged with those of another entity, or in the unlikely event of a bankruptcy, we may disclose, share or transfer some or all of our users' Personal Information to or with this entity in preparation of the transaction, as part of the due diligence, or after the transaction has been consummated, so that the successor entity can continue providing our services to our users. If

the recipient of the Personal Information has privacy practices that do not meet the substance of this Privacy Policy, you will be given the opportunity to exercise your rights with respect to your Personal Information.

Law Enforcement; Litigation—Certain federal, state, local, or other government regulations may require that we disclose information that we hold. In such cases, we will use reasonable efforts to disclose only the Personal Information required under applicable law, such as in response to a facially valid court order, warrant or subpoena issued or made by a court, person or body. We may use or disclose Personal Information (a) if we believe in good faith that a law, regulation, rule or guideline requires it; or (b) to a person who needs the information because of an emergency that threatens the life, health or security of an identified group or person.

Aggregated data—Other than as stated above, if the Chamber provides a third-party with Personal Information, it will be in the form of aggregated data and used for product development, research, or statistical analysis. Aggregated data are created from records that are stripped of all personal identifiers, such as aggregated Assessment responses, or on-site behavior.

Cookies and Other Technologies

A cookie is a small text file that a website sends to a visitor's browser and that sends back information each time the visitor makes a request from the website. A cookie contains a unique identification number that identifies the visitor's browser, but not necessarily the visitor. Cookies can be accepted, rejected, or identified by configuring a browser's preferences or settings. Pixel tags or clear gifs are tiny graphics with a unique identifier that are embedded invisibly on a webpage and are used to track a visitor's movements on a website. We use the information gathered by clear gifs to help us better manage content on the Sites. Cookies and pixel tags are used to help recognize a returning visitor, and to help customize the visitor's online experience. Unless a visitor specifically informs us of his/her identity (e.g., by registering with us), we will not know who the individual visitor is.

The Site uses cookies as follows:

- to collect Session Data and other session information;
- to process orders and to store order and shopping cart information;
- to store and hash usernames and passwords so that users do not have to re-enter this information each time they log in; and
- to collect analytics relating to visitors' use of the Site.

For more information about our specific use of cookies on the Sites, please visit the "Cookies" section on the relevant Site(s).

The Sites do not respond to "do not track" signals or other similar mechanisms.

How We Retain Personal Information

As a general principle, we keep data in personally-identifiable form only for as long as necessary to achieve the purposes for which it is being processed (subject to our reasonable archive, backup, and research practices). In practice, that generally means we may retain your Personal Information (i) for as long as your account remains active; (ii) for as long as you continue to do business with us; or (iii) for as long as we are required or permitted to by applicable law. When your account becomes inactive (as determined by us in our sole discretion), or if you cease doing business with us, we may retain your Personal Information for

an additional period for our reasonable archive and backup purposes. The duration of our retention of your Personal Information may be set forth more specifically in our written agreement(s) with you, or our applicable Terms of Service or other legal terms. At all times, both while you are an active Customer, Respondent, or other registered user and thereafter, we may retain Assessment responses and other data in non-personally-identifiable format for as long as the information is needed for our research, statistical analysis, product development, or other commercial purposes.

How We Protect Personal Information

We follow generally-accepted industry standards to protect Personal Information, both during transmission and once we receive it. We use administrative, physical, and technical measures designed to protect Personal Information from unauthorized access, loss, misuse, disclosure, alteration, or destruction.

We use industry-standard technological means to protect Personal Information while in transit through the Internet. We use encryption and a comprehensive authentication protocol to provide reasonable security.

No method of transmission over the Internet, or method of electronic storage, is fully secure, however. Therefore, while we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

We comply with privacy laws that are applicable to us, including (without limitation) the General Data Protection Regulation (GDPR) and the California Consumer Privacy Act (CCPA).

Your Rights

We respect your rights as a data subject. In those instances when we are a data controller, we provide you with the rights described below. In those instances where we are a data processor, we will reasonably assist the data controller in facilitating your ability to exercise the rights below.

You may have the right under applicable privacy and data protection laws to request free of charge:

- access to your Personal Information;
- rectification or erasure of your Personal Information;
- restriction of our processing of your Personal Information, or to object to our processing;
- and
- portability of your Personal Information.

If you wish to exercise these rights, please submit your request in writing via the contact information provided in the [“Contact Us”](#) section. We will respond to your request consistent with applicable laws. To protect your privacy and security, we may require you to verify your identity.

California Privacy Rights—California law requires that individuals be informed when their Personal Information is shared with third parties for these third parties’ direct marketing purposes. Other than as described in this Privacy Policy, we do not disclose your Personal Information to third parties for the direct marketing purposes of these third parties. If our practices change in the future, we will inform you of the change and will provide you with an opportunity to opt out of such information sharing for direct purposes of a third party. If you are located in California, California Civil Code Section § 1798.83 permits users of our Sites that are California residents to request certain information regarding our disclosure of Personal

Information to third parties for their direct marketing purposes. Please see the “[California Consumer Privacy Act Notice](#)” section.

If the Chamber is the controller of your Personal Information and you wish to exercise any of the rights described above, please contact us with proof of identity, as provided in the “[Contact Us](#)” section. In general, you can expect a response to your request within 30 days. However, if your request is complex or involves a high volume of data, the Chamber may inform you that the request could take up to an additional sixty (60) days. In some instances, fees may apply. If the Chamber is not the controller of your Personal Information, we will ask you to direct your request to the data controller, and the Chamber will reasonably assist the data controller in facilitating the request.

Complaints and Disputes

If you have questions or complaints regarding our Privacy Policy or practices, you should first contact us as indicated in the “[Contact Us](#)” section below. You may also contact us at join@sacasiancc.org regarding any complaints you may have.

If our efforts to resolve your complaint through the Chamber’s internal dispute resolution mechanisms are unsatisfactory, you agree to first attempt to settle in good faith the dispute through mediation administered by JAMS, under its International Mediation Rules. The mediator may propose any appropriate remedy, such as publicity for findings of non-compliance, payment of compensation for losses incurred as a result of non-compliance, or cessation of processing of the Personal Information who has brought the complaint. The mediation will be held online and all documents and other correspondence will be transmitted through email.

If our efforts to resolve the dispute through mediation are unsuccessful, you agree to binding arbitration administered by JAMS pursuant to the JAMS Streamlined Arbitration Procedure Rules for claims that do not exceed \$250,000 and the JAMS Comprehensive Arbitration Rules and Procedures for claims exceeding \$250,000 in effect at the time the arbitration is initiated. Judgment on the award rendered by the arbitrator may be entered into any court having jurisdiction over the matter. The arbitration will be held online and all documents and other correspondence will be transmitted through email.

Changes to this Privacy Policy

We may change this Privacy Policy from time to time. If we make material changes, we will place a prominent notice on the affected Site(s) or we will send you a notice to the email address associated with your account.

Contact Us

If you have any question about (a) this Privacy Policy, or (b) the collection, use, management, or disclosure of your Personal Information, or (c) accessing, modifying, or closing your account, please contact us as indicated below. We will attempt to respond to your questions or concerns promptly after we receive them.

California Consumer Privacy Act Notice

1. About this Privacy Notice

Pursuant to the California Consumer Privacy Act of 2018 (“CCPA”), this California Consumer Privacy Act Notice (“CCPA Notice”) is being provided by Sacramento Asian-Pacific Chamber of Commerce (the “Chamber,” “we,” “us” or “our”). This CCPA Notice supplements our Privacy Policy and applies solely to California consumers, effective December 9, 2024. Terms used but not defined shall have the meaning ascribed to them in the CCPA. This CCPA Notice does not apply to Personal Information that we process as a service provider on behalf of our Customers or that we collect from job applicants, contractors, or employees.

2. Personal Information Collected and Disclosed

We may have collected and disclosed the following categories of Personal Information in the preceding 12 months:

	Collected	Disclosed
Identifiers such as a real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address and account name.		
Personal information as defined in the California customer records law, such as name, contact information, education, employment, employment history and financial information.		
Characteristics of protected classifications under California or federal law, such as gender and date of birth.		
Commercial information, such as transaction information, purchase history, financial details, and payment information.		
Biometric information, such as fingerprints and voiceprints.		
Internet or other electronic network activity information, such as browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems, and advertisements.		
Geolocation data, such as device location.		
Audio, electronic, visual, and similar information, such as images and audio, video or call recordings created in connection with our business activities.		
Professional or employment-related information, such as job title as well as work history and experience.		
Education information subject to the federal Family Educational Rights and Privacy Act, such as student records.		
Inferences drawn from any of the Personal Information listed above to create a profile or summary about, for example, an individual’s preferences and characteristics.		

We collect this Personal Information from you and from other categories of sources such as: our affiliates, our Customers, public and publicly available sources, our third-party resellers and referral partners, data suppliers and service providers, partners with which we offer co-branded services or engage in joint event or marketing activities, social networks, news outlets and related media, and the organization with which you are employed or affiliated.

We share this Personal Information with: our affiliates, our Customers, our service providers, agents and representatives, joint venture partners, distributors, referral partners and integrators, the administrators authorized by your organization (if you access our Products or Services through your organization), licensors of third-party applications (if you access a third-party application through our license agreement with the licensor), and other parties where required by law or to protect our rights.

We may use this Personal Information to: operate, manage, and maintain our business, to provide our Products or Services, to communicate with you, for our vendor management purposes, and to accomplish our business purposes and objectives, including, for example, using Personal Information to: develop, improve, repair, and maintain our Products or Services; process or fulfill a request or other transactions submitted to us; personalize, advertise, and market our Products or Services; conduct research, analytics, and data analysis; maintain our facilities and infrastructure; undertake quality and safety assurance measures; conduct risk and security control and monitoring; detect and prevent fraud; perform identity verification; perform accounting, audit, and other internal functions; comply with law, legal process, and internal policies; maintain records; exercise and defend legal claims; and fulfill legal obligations.

We disclose the above categories of Personal Information to: our affiliates, our Customers, our service providers, agents and representatives, joint venture partners, distributors, referral partners and integrators; the administrators authorized by your organization (if you access our Products or Services through your organization), licensors of third-party applications (if you access a third-party application through our license agreement with the licensor), and other parties where required by law or to protect our rights.

The Chamber does not sell Personal Information to third parties within the scope of the application of the CCPA.

3. Consumer Rights

You have the right to request that we disclose to you (i) the categories of Personal Information we collected about you and the categories of sources from which we collected such information; (ii) the specific pieces of Personal Information we collected about you; (iii) the business or commercial purpose for collecting Personal Information about you; and (iv) the categories of Personal Information about you that we shared or disclosed for a business purpose and the categories of third parties with whom we shared or to whom we disclosed such information in the preceding 12 months.

You also have the right to request that we delete Personal Information we collected from you subject to certain exceptions.

You also have the right to not be discriminated against in pricing and services because you exercise any of your rights under the CCPA. We do not offer financial incentives or price or service differences to consumers in exchange for the retention or sale of a consumer's Personal Information.

4. How to Make a Request

You may make a request for the disclosures or deletion described above through our Privacy Center join@sacasiancc.org

You may be required to submit proof of your identity for these requests to be processed as a verifiable consumer request. Such information may include your name, home address, social

security number or driver's license. This information will be used only for the purposes of verifying your identity and processing your request. We may not be able to comply with your request if we are unable to confirm your identity or to connect the information you submit in your request with Personal Information in our possession. You may designate an authorized agent to make a request on your behalf subject to proof of identity and authorization. Requests made through an authorized agent should be made to our Privacy Center join@sacasiancc.org

We will respond to your request consistent with the CCPA, which does not apply to certain information, such as information made available from government records, certain data subject to the Fair Credit Reporting Act (FCRA), Gramm-Leach-Bliley Act (GLBA) and certain other laws, and where its application is preempted by, or in conflict with, federal law or the United States or California Constitution.

5. Changes

We will update this CCPA Notice from time to time. Any changes will be posted on this page with an updated revision date.