

SugarAI Privacy Policy for California Residents

Last Updated on: June 29, 2026

This **SugarAI Privacy Policy for California Residents** supplements the information contained in SugarAI's Privacy Policy located at <https://www.sugarai.com/legal/privacy-policy/> (“**Privacy Policy**”) and applies solely to all visitors, users, and others who reside in the State of California (“**you**”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act of 2020 (CPRA) (collectively, “**CCPA**”), and any terms defined in the CCPA have the same meaning when used in this Policy.

Information We Collect

Our publicly available websites (“**Website**”) collects information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“**personal information**”).

Personal information does not include:

- Publicly available information from government records.
- Deidentified 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), clinical trial data, or other qualifying research 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.

In particular, our Website has collected the following categories of personal information from you within the last twelve (12) months:

Personal Information Category	Retention Period	Business Purpose	Shared
Identifiers Examples: A real name, unique personal identifier, online identifier, Internet Protocol address, email address, account name, company name, company size, or other similar identifiers.	38 months	Communicate, interact and build our relationship with you for purposes such as marketing, advertising, and product support.	Shared
California Customer Records personal information Examples: A name, address, telephone number. Some personal information included in this category may overlap with other categories.	38 months	Communicate, interact and build our relationship with you for purposes such as marketing, advertising, and product support.	Shared
Protected classification characteristics under California or federal law Examples: Age (40 years or older) and gender.	38 months	Communicate, interact and build our relationship with you for purposes such as marketing, advertising, and product support.	Shared
Commercial information	38 months	Communicate, interact and build our relationship with you for purposes such as marketing, advertising, and product support.	Not Shared

Examples: Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.			
Internet or other similar network activity Examples: Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	38 months	Communicate, interact and build our relationship with you for purposes such as marketing, advertising, and product support.	Shared
Geolocation data Examples: Physical location or movements.	38 months	Communicate, interact and build our relationship with you for purposes such as marketing, advertising, and product support.	Shared
Professional or employment-related information Examples: Company, job title, role, industry, and level.	38 months	Communicate, interact and build our relationship with you for purposes such as marketing, advertising, and product support.	Shared

If you complete forms on our Website, that personal information may be retained until deleted.

Our Website obtains the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or products and services you purchase.
- Indirectly from you. For example, from observing your actions on our Website.
- As described in our Privacy Policy.

Use of Personal Information

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

- As described in Section I of our Privacy Policy.
- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a price quote or 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. We may also save your information to facilitate new product orders or process returns.
- 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 our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our Website users/you is among the assets transferred.

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.

We do not sell personal information.

Sharing Personal Information

We 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 categories of third parties as described in the Privacy Policy in the section titled Sharing of your personal data.

Your Rights and Choices

The CCPA provides you with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Right to Know and Data Portability

You have the right to request that SugarAI disclose certain information to you about our collection and use of your personal information over the past 12 months (the "right to know"). Once we receive your request and confirm your identity, 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 that personal information.
- The categories of third parties with whom we share that personal information.
- If we disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased.
 - the specific pieces of personal information we collected about you (also called a data portability request).

Right to Delete

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions (the "right to delete"). Once we receive your request and confirm your identity (see Exercising Your Rights to Know or Delete), we will 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:

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 right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic 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.

We will delete or deidentify personal information not subject to one of these exceptions from our records and will direct our service providers to take similar action.

Exercising Your Rights to Know or Delete

To exercise your rights to know or delete described above, please submit a request by either:

- Calling us at (408) 454-6900.
- Emailing us at dataprivacy@sugarai.com.

Only you, or someone legally authorized to act on your behalf, may make a request to know or delete related to your personal information.

You may also make a request to know or delete on behalf of your child.

You may only submit a request to know twice within a 12-month period. Your request to know or delete 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.

You do not need to create an account with us to submit a request to know or delete.

We will only use personal information provided in the request to verify the requestor's identity or authority to make it.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to additional 45 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account or email. If you do not have an account with us, we will deliver our written response by mail or email, at our option.

Any disclosures we provide will only cover the 12-month period preceding our receipt of your request. 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 in a list format preferred by us.

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.

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 dataprivacy@sugarai.com or write us at: SugarAI Software Inc., 548 Market Street, PMB 59423, San Francisco, CA 94104-5401, USA, c/o General Counsel.

Changes to Our Privacy Policy

We reserve the right to amend this privacy policy at our discretion and at any time. When we make changes to this privacy policy, 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 SugarAI collects and uses your information described here 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: <https://www.sugarai.com/contact/>

Email: dataprivacy@sugarai.com

Postal Address: SugarAI Software Inc., 548 Market Street, PMB 59423, San Francisco, CA 94104-5401, USA, c/o General Counsel