



## MeridianLink California Consumer Privacy Notice

MeridianLink, Inc. and its subsidiaries and affiliates (collectively, “MeridianLink” or the “Company” or “We”) respect your privacy and are committed to protecting it through our compliance with this Consumer Privacy Notice.

This California Consumer Privacy Notice (“Notice”) applies to “Consumers” as defined by the California Consumer Privacy Act (“CCPA”) and the California Privacy Rights Act (“CPRA”) and is a supplement to the information contained in the MeridianLink Privacy Policy and applies solely to all customers, employees, visitors, users, and others who reside in the State of California (“Consumers” or “you”).

We operate as a Software as a Service (SAAS) Company, providing software for financial institutions and other businesses. As such, we are a service provider pursuant to California law. While we are a service provider of our client’s data, our clients remain the business that is responsible for the data. It is the obligation and responsibility of the business to perform the initial intake of a consumer privacy request, perform identify verification, and route to the appropriate service provider responsible for holding or storing that data. All consumer privacy requests pertaining to information you have provided to one of our clients, a channel partner, or reseller of our software, to whom we are providing software as a service, should be directed first to those parties.

### Personal Information (“PI”) We Collect

We collect limited Consumer data. The information we do collect could identify, relate to, describe, reference, and is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Consumer, household, or device (“personal information” or “PI”). A subset of personal information which we collect is considered sensitive personal information.

“Sensitive personal information” means: (A) personal information that reveals your social security, driver’s license, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic origin, religious or philosophical beliefs, or union membership; the contents of your mail, email and text messages, unless we are the intended recipient of the communication; genetic data; and the processing of biometric information for the purpose of uniquely identifying you; (B) personal information collected and analyzed concerning your health; or (C) personal information collected and analyzed concerning your sex life or sexual orientation. Note that “Sensitive personal information” excludes information that is made publicly available.

### Personal information does not include:

- Publicly available information, such as from government records.



- Deidentified or aggregated Consumer information.
- Information excluded from the CCPA/CPRA's scope, such as:
  - 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.

The table below sets forth the categories of PI. We have indicated the categories of data which we have collected, any of the examples provided, from Consumers within the last twelve (12) months:

Category	Examples	Collected
<b>A. Identifiers</b>	A full name, physical or mailing address, Social Security number, driver's license number, email address, telephone number, or other similar unique personal identifiers.	Yes
<b>B. Personal Records</b>	A full name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card 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.	Yes
<b>C. Consumer Characteristics Information</b>	A non-specific age or age range, race, color ancestry, national origin, gender, religion, sexual orientation, familial genetic information, physical or mental disability, veteran or military status, or other similar protected classes of Consumer characteristics.	Yes
<b>D. Commercial Information</b>	Account numbers, account types, records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes
<b>E. Biometric information</b>	Biometric derived information, typically used for identity authentication purposes, including information such as fingerprint, facial recognition patterns, voice prints and retina images.	No



<b>F. Internet or Other Similar Network Activity</b>	Browsing history, search history, Internet Protocol (IP) address, Internet cookies or other information designed to identify Consumer interaction on a website, application, or digital advertisement.	Yes
<b>G. Geolocation Data</b>	Information identifying Consumers' physical location or movements	No
<b>H. Sensory Data</b>	Audio, electronic, visual, thermal, olfactory, or similar information.	Yes
<b>I. Professional or Employment-Related Information</b>	Current or past job history or performance evaluations.	Yes
<b>J. Non-public Education Information (per FERPA, 20 U.S.C. Section 1232g, 34 C.F.R. Part 99)</b>	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.	No
<b>K. Inferences Drawn From Other Personal Information</b>	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No

We obtain 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.
- Records and copies of your correspondence (including email addresses and associated metadata), if you contact us.
- Your responses to surveys that we might ask you to complete.
- From third parties that interact with us in connection with the services we perform, they perform, or in connection with our marketing efforts. For example, from data resellers for marketing purposes used to help determine appropriate products and services applicability to current and prospective customers.

### Use Of Personal Information

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



- To fulfill or meet the reason you provided the information. For example, if you disclose your name and contact information to request information 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 and prevent transactional fraud. We may also save your information to facilitate new product orders or process returns.
- 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 with your consent, where required by law.
- To create, maintain, customize, and secure your account with us.
- 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.
- As necessary or appropriate to protect the rights, property or safety of us, our clients, 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 PI or as otherwise allowed by law.
- 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 PI held by us is among the assets transferred.
- To our subsidiaries and affiliates as allowed by law. In policy and practice, our disclosures of PI amongst our affiliates are performed in a limited nature, strictly monitored, and only to the extent permitted under CCPA/CPRA.

We will not collect additional categories of PI or use the PI we collected for materially different, unrelated, or incompatible purposes without providing you notice. We retain records, data and information for multiple retention periods in accordance with our records retention and data governance policies and procedures and/or as otherwise required by law.

### **Disclosure Of Personal Information**

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

- Subsidiaries and affiliates
- Service providers, contractors, and other qualified vendors, such as
  - IT service providers that provide us with SaaS services including customer relationship management and other database and application software;
  - Marketing service providers, advertisers and advertising networks that process the data to send you advertisements about our products and serve relevant advertisements across platforms to you and others;



- Analytics and search engine providers that assist us in the improvement and optimization of the Website;
- Finance and accounting tools, including payment processors
- Government agencies and other public entities

## Use of Service Providers

Since January 1, 2020, we have disclosed the following categories of PI with our service providers, contractors, and other qualified vendors for a business purpose:

- Category A: Identifiers.
- Category B: California Customer Records personal information categories.
- Category C: Protected classification characteristics under California/federal law.
- Category D: Commercial information.
- Category F: Internet or other similar network activity.
- Category H: Sensory or surveillance data
- Category I: Current or past job history or performance evaluations.

The business purposes for which we may disclose your PI to such service providers, contractors, and other qualified vendors are referenced in the “Use of Personal Information” section above. Our vendors may themselves engage services providers or subcontractors, including other third parties, to enable them to perform services for us, which sub-processing is, for purposes of certainty, an additional business purpose for which we are providing you notice.

## Your Rights And Choices

If you are a Consumer under the CCPA/CPRA, you are granted rights pertaining to information you may request and when certain actions must be performed concerning the use of your PI. You have the right to exercise these rights yourself or via an authorized agent who meets the agency requirements of the CCPA/CPRA. You may also make a verifiable Consumer request on behalf of your minor child. This section describes your CCPA/CPRA rights and explains how to exercise those rights.

## Your Right To Know

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 (the "right to know"). Once we receive your request and confirm your identity (see “Eligibility to Make a Request”) we will disclose to you:

- The categories of PI we have collected about you.
- The categories of sources from which we collected your PI.
- The business purposes for our collecting your PI.
- The categories of third parties to whom we have shared your PI.



- The specific pieces of PI we have collected about you.
- A list of the categories of PI disclosed for a business purpose in the prior 12 months, or that no disclosure occurred.
- A list of the categories of PI sold about you in the prior 12 months, or that no sale occurred
- If we sold your PI, we would explain the categories of your PI we have sold and the categories of third parties to which we sold PI, by categories of PI sold for each third party.

We retain records, data and information for multiple retention periods in accordance with our records retention and data governance policies and procedures and as otherwise required by law. As a result, certain information requested may no longer exist or be available for us to provide in response to your request for potentially relevant information going back 12 months in time from the date your request was received.

### **Your Right To Obtain Copies**

You have the right to make or obtain a transportable copy of your PI that we have collected in the period that is 12 months prior to the request date.

Please note that PI is retained by us for various time periods in accordance with governing record retention, legal, and other business process requirements, and as such we may not be able to fully respond to what might be relevant going back 12 months prior to the request.

### **Your Right To Correct**

You have the right to request that we correct, or limit the use of, your personal information that we have collected from you and retained, subject to certain exceptions. In order to attempt to correct your personal information, we must know what specific information you wish to have corrected.

### **Your Right To Delete**

You have the right to request that we delete any of your PI that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your “verifiable Consumer request”, we will delete (and direct our service providers to delete) your PI wherever it exists, unless an exception applies.

We have the right and may deny your deletion request under allowed exception bases provided by the CCPA/CPRA, where retaining the information is necessary for us, or our service providers, to:

- Complete the transaction for which we collected the PI, provide a product or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise fulfill our contract with you.





- Detect and respond to security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Correct or debug products with errors where your information may contribute to resolution of the errors which 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.
- Comply with a legal obligation or regulatory requirement, including, but not limited to, record retention obligations, as may be directed by a governing regulatory agency.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it and are reasonably aligned with your expectations as a Consumer with a business relationship with us.

### **Your Right To Limit**

While California law provides California Consumers with the right to request that covered businesses limit the use and disclosure of sensitive personal information that is collected or processed with the purpose of inferring characteristics about you (subject to certain exceptions), MeridianLink does not collect or process sensitive personal information through this Website for the purpose of inferring characteristics about you, as we understand those terms to be defined by the CCPA/CPRA.

### **Your Right to Opt Out of Sale and Sharing**

We do not sell or share your PI as such is defined under the CCPA/CPRA, and until such time as we change this policy by updating this Privacy Notice, will treat all PI collected under that policy as subject to a “do not sell/share” request.

### **Your Right Of No Retaliation**

You also have the right to not be discriminated against for exercising your rights under the CCPA/CPRA. If you exercise your rights under the CCPA/CPRA, 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 with 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.
- Retaliate against an employee, applicant for employment, or independent contractor, as those terms are defined in California Civil Code Section 1798.145.

### How to Exercise Your Rights

MeridianLink will respond to requests to know, delete, and correct in accordance with applicable law if it can verify the identity of the individual submitting the request. You can exercise these rights in the following ways:

To submit a privacy rights request, please use our [Privacy Request Form](#).

**Mail:** 3560 Hyland Avenue, Ste. 200  
Costa Mesa, CA 92626

**Phone:** 888-593-8970 (press 0 to reach the front desk and be directed)

**Email:** [privacy@meridianlink.com](mailto:privacy@meridianlink.com)

To ensure we accurately identify you among other Consumers, we may ask you for basic information required to accurately identify you with respect to your request. Under CCPA/CPRA, any request you submit to us is subject to an identification process (“Verifiable Consumer Request”), which, in certain cases may also require residency verification. 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.

If we cannot comply with a request, we will explain the reasons in our response to you. We will use PI provided in a Verifiable Consumer Request only to verify your identity or authority to make the request and to track and document request responses. We will not use information obtained from you within your Verifiable Consumer Request for any other purpose.

You do not need to create an account with us to submit a request to know or delete. We will use all available internal MeridianLink resources, within reason, to identify your Consumer PI that we collect, process, store, disclose and otherwise use and respond to your request. We do not charge a fee to respond to your requests.

Upon receipt of your CCPA/CPRA Consumer request, we will acknowledge your request in writing within 10 days of receipt of your request, and let you know whether we need additional information to complete your Verifiable Consumer Request process, whether we need additional time to fully respond with your request, whether we have found information responsive to your request and/or verified deletion of your PI, or whether we





did not identify any of your PI collected, used or disclosed, in accordance with CCPA/CPRA requirements.

California law permits California Consumers to use an authorized agent to make privacy rights requests. We require the authorized agent to provide us with proof of the California Consumer's written permission (for example, a power of attorney) that shows the authorized agent has the authority to submit a request for the California Consumer. An authorized agent must follow the process described above to make a request. The authorized agent must also verify his/her own identity. We may confirm the agent's authority with the California Consumer about whom the request was made.

### **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 use the Contact Information below.

Please note that our Website does not respond to Do Not Track signals.

Our Website may contain careers sections that allow you to apply for employment at MeridianLink and its affiliates or subsidiaries. If you are a California job applicant, please see our [California Applicant Privacy Notice](#).

### **Other Data Privacy Laws**

Please note that your rights and choices regarding your personal information are often subject to other laws. Personal information collected pursuant to other laws, such as information governed by the Fair Credit Reporting Act, the Gramm-Leach-Bliley Act, and the California Financial Information Privacy Act, may be exempt from requests to access, correct, limit or delete data.

### **Changes To Our Privacy Notice**

It is our policy to post any changes we make to our Consumer Privacy Notice on this page with a notice that this Consumer Privacy Notice has been updated on the Website home page. If we make material changes to how we treat our users' personal information, we will notify you by email to the primary email address specified in your account and/or through a notice on the Website home page. The date this Consumer Privacy Notice was last revised is identified at the bottom of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this Consumer Privacy Notice to check for any changes.



## Contact Information

If you have any questions about this Consumer Privacy Notice, our Applicant Privacy Notice, our Privacy Policy, the ways in which we collect and use your personal information, your choices and rights regarding our use of your personal information, or wish to exercise your rights as a Consumer under California law, please do not hesitate to contact us using one of the following contact methods below:

To submit a privacy rights request, please use our [Privacy Request Form](#).

**Mail:** 3560 Hyland Avenue, Ste. 200  
Costa Mesa, CA 92626

**Phone:** 888-593-8970 (press 0 to reach the front desk and be directed)

**Email:** [privacy@meridianlink.com](mailto:privacy@meridianlink.com)

Last Modified: June 6, 2023