

**PRIVACY NOTICE
FOR CALIFORNIA RESIDENTS**

Effective Date: January 1, 2020

Last Reviewed: December 19, 2019

This **PRIVACY NOTICE FOR CALIFORNIA RESIDENTS** supplements the information contained in [the Privacy Notice and Declaration of Consent](#) of LUXOFT and its affiliates (collectively, “we,” “us,” or “our”) and applies solely to the residents of the State of California (“consumers” or “you” or “your”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”), as amended, and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice.

Please note that certain exemptions apply to your rights and our obligations pursuant to the CCPA. These rights and requirements may not apply in certain situations depending on your relationship with us, our other legal obligations and as otherwise provided for in the CCPA.

We reserve 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 our website and update the notice’s effective date.

Information We Collect

We 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**”). In particular, we may have collected the following categories of personal information from consumers within the last twelve (12) months:

- **Identifiers** - A real name, alias, postal address, unique personal identifier, online identifier, internet protocol (IP) address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.
- **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.
- **Protected classifications 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).
- **Internet or other electronic network activity information** - Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.
- **Geolocation data** - Physical location or movements.
- **Professional or employment-related information** - Current or past job history or performance evaluations

Where We Collect Your Personal Information From

We will collect the personal information described above from one or more of the below sources:

- Directly from you throughout our relationship, including when you complete forms and applications, sign up and/or use our services and websites, or when you visit our offices or attend our events.
- Indirectly from you, for example, from observing your actions on our website.
- From our parent entities, affiliates, subsidiaries and partners
- From third parties that are authorized to share your information with us, for example, from documents that our clients provide to us related to the services for which they engage us.

Use of Personal Information

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

- To fulfill or meet the purpose described to you when collecting your personal information.
- To provide you with information or services that you request from us.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us.
- To improve our website
- To manage our relationship with you or your business.
- To develop and carry out marketing activities in order to keep our clients informed about our products and services.
- To develop and manage our brand.
- To help maintain the safety, security, and integrity of our websites, software, systems, networks, products, services, databases, other technology assets, and business.
- As necessary or appropriate to protect the rights, property or safety of us, our employees or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- 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 is among the assets transferred.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

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.

Disclosures of Personal Information for a Business Purpose

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

- Identifiers.
- California Customer Records personal information categories.
- Protected classification characteristics under California or federal law.
- Internet or other electronic network activity information

- Geolocation data
- Professional or employment-related information.

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

- Our parent entities, affiliates and subsidiaries.
- Service providers who help manage, develop and analyze our business and/or deliver services to us and our clients. These service providers have agreed to confidentiality restrictions and use any personal information we share with them or which they collect on our behalf solely for the purpose of providing the contracted service to us.
- Third parties to whom you or your agents authorize us to disclose your personal information.
- Internet cookie information recipients including [Google](#), [Facebook](#), [LinkedIn](#), [YouTube](#) and [Twitter](#) (click on each respective link to see that party's privacy policy).

No Sale of Personal Information

California residents may opt out of the “sale” of their personal information. We do not “sell” your personal information as we understand that term to be defined by the CCPA and its implementing regulations.

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 we collected about you.
- The categories of sources for the personal information we collected about you.
- The business or commercial purpose for collecting 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.

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained. However, we may retain personal information as authorized under applicable law, such as personal information required as necessary to provide our services, protect our business and systems from fraudulent activity, to debug and identify errors that impair existing functionality, as necessary for us, or others to exercise their free speech or other rights, comply with law enforcement requests pursuant to lawful processes, for our own internal purposes reasonably related to your relationship with us, or to comply with legal obligations. We need certain types of information so that we can provide our services. If you ask us to delete it, you may no longer be able to access or use our services.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request through one of the following methods:

- Toll-free line: +1-888-589-6386
- Email: dpo-us@luxoft.com

You may only request a copy of your data twice within a 12-month period. The request must:

- Provide sufficient information that allows us to verify, to a reasonably high degree of certainty, that you are the person about whom we collected personal information. This may include

requesting that you provide us with at least two or more pieces of personal information to match against personal information about you that we may or may not maintain and which we have determined to be reliable for the purpose of verification.

- 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 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 requestor's identity or authority to make the request.

Authorized Agent

Only you, or a person you have designated in writing as your authorized agent, or whom is registered with the California Secretary of State to act on your behalf, or whom you have provided power of attorney pursuant to California Probate Code sections 4000 to 4465, ("Authorized Agent"), may make a consumer request related to your personal information. You may also make a request on behalf of your minor child.

If you wish to have an Authorized Agent make a request on your behalf, they will need to provide us with sufficient written proof that you have designated them as your Authorized Agent and we will still require you to provide sufficient information to allow us to reasonably verify that you are the person about whom we collected personal information.

Non-Discrimination

You have the right not to be discriminated against for exercising any of your CCPA rights. We will not discriminate against you for exercising your CCPA rights.

Contact Information

If you have any questions or comments about this notice, our Privacy Policy, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Telephone: +1-888-589-6386

Website: www.luxoft.com

Email Address: dpo-us@luxoft.com

Mailing Address: Luxoft USA, Inc.
1 Rockefeller Center, Floor 27
New York, NY 10020
USA