

CCPA Privacy Notice User Guide

Effective Date

The CCPA requires the business to review and update the privacy notice's content at least every 12 months. If the annual review does not cause the business to change or alter the policy, it should add the optional "last reviewed" clause. This confirms that the required annual review took place but did not lead to changes requiring a new effective date.

Personal Information We Collect

Only include categories of personal information that your business unit actually collects. For example, if your business unit does not collect biometric information or geolocation data, those sections should be removed from this notice. **Please note that for 2019-2020, job applicants, current and former employees and independent contractors, and subjects of certain business-to-business communications acting solely in their capacity as representatives of another business, are not considered "Consumers" for purposes of this notice. If this exemption expires, the 2021 privacy notice will need to take these groups into account.**

Based on our business, we assume that business units are not collecting data on consumer characteristics such as sex, marital status, religion, race, disability, etc. or making inferences based on the data that the business unit is collecting (e.g., profiles containing a consumer's preferences, psychological trends, preferences or predispositions). **IF YOUR BUSINESS UNIT IS COLLECTING INFORMATION ON A CONSUMER CHARACTERISTICS OR MAKING INFERENCES BASED ON DATA COLLECTED, PLEASE CONTACT JES WARREN (jwarren@transdigm.com) AND GABBY FEUER (gfeuer@trandigm.com).**

We provided broad examples of what types of information could be in each category of information. For each applicable category, edit examples to reflect those examples / specifics relevant to your business unit.

Other Potential Categories of Personal Information

If your business unit collects personal information in the categories below, please add them to your notice, including how the data is received and the purpose of its collection.

Customer Account Details / Commercial Information: records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

Geolocation Data: precise physical location or movements and travel patterns.

Sensory Data: audio recordings of customer care calls, electronic, visual, thermal, olfactory, or similar information.

Collection of Personal Information

The following are some examples of how personal information is collected:

- 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.
- From a third party. For example, from analytics or marketing providers.

Business Purpose

The seven enumerated categories of business purposes in the statute are: (1) processing interactions and transactions; (2) managing interactions and transactions; (3) performing services; (4) research and development; (5) quality assurance; (6) security; and (7) debugging. Some examples of language include:

- 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 provide, support, personalize, and develop our Website, products, and services.
- To create, maintain, customize, and secure your account with us.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- 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 or text message (with your consent, where required by law).
- 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, including to develop and improve our Website, products, and services.
- 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.

Sharing Personal Information

The categories of personal information that are shared should tie back to (and be limited by) only the categories of personal information that the business discloses it collects.

IF YOUR BUSINESS UNIT HAS SOLD ANY PERSONAL INFORMATION, PLEASE REACH OUT TO JES WARREN (jwarren@transdigm.com) OR GABBY FEUER (gfeuer@trandigm.com). There is a "sale" for CCPA purposes where data is exchanged directly for money or similar valuable consideration.

Non-Discrimination and Financial Incentive Programs

If your business unit offers financial incentive programs, please contact Jes Warren (jwarren@transdigm.com) and Gabby Feuer (gfeuer@trandigm.com).