



# California Consumer Privacy Statement

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# California Consumer Privacy Statement

Last updated 26th Feb 2020

## Our commitment to your privacy

This California Consumer Privacy Statement supplements the [ADELPHI Privacy Policy](#) and applies solely to visitors, users and others who reside in the State of California ('consumers' or 'you') and the ADELPHI companies in scope. This Statement provides information about our privacy practices; this Statement does not apply to our personnel.

The following Adelphi companies are in scope for the California Consumer Privacy Act of 2018 (CCPA):

<p>Adelphi Research by Design LLC trading as Adelphi Research 2005 S. Easton Road, Suite 300, Doylestown, PA 18901</p>
<p><b>Adelphi Real World</b> Adelphi Group Ltd trading as Adelphi Real World Adelphi Mill, Grimshaw Lane, Bollington, Cheshire, SK10 5JB. Company No: 1975338 Registered address: Bankside 3, 90 - 100 Southwark Street, London, England, SE1 0SW</p>

This California Consumer Privacy Statement uses certain terms that have the meaning given to them in the California Consumer Privacy Act of 2018 and its implementing regulations (the 'CCPA').

In this Statement **ADELPHI**, **we**, and **us** means the **ADELPHI** companies listed above.

## Notice of collection and use of personal information

**Adelphi** collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a consumer or device ('personal information'). We obtain the categories of personal information listed below as set forth in the methods described in the [Adelphi Privacy Policy](#).

We may collect the following categories of personal information about you:

- **Identifiers:** identifiers such as a real name, alias, postal address, unique personal identifier (such as a device identifier; cookies, beacons, pixel tags, mobile ad identifiers and similar technology; customer number, unique pseudonym, or user alias; telephone number and other forms of persistent or probabilistic identifiers), online identifier, internet protocol address, email address, account name, Social Security number, driver's license number, passport number, and other similar identifiers.
- **Additional Data Subject to Cal. Civ. Code § 1798.80:** signature, physical characteristics or description, state identification card number, insurance policy number, education, bank account number, credit card number, debit card number, and other financial information, medical information, and health insurance information.
- **Protected Classifications:** characteristics of protected classifications under California or federal law, such as race, color, national origin, religion, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, medical condition, ancestry, genetic information, disability, citizenship status, and military and veteran status.

- **Commercial Information:** commercial information, including records of personal property, products or services purchased, obtained, or considered, and other purchasing or consuming histories or tendencies.
- **Online Activity:** Internet and other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with websites or applications.
- **Geolocation Data**
- **Sensory Information:** audio, electronic, visual, and similar information.
- **Employment Information:** professional or employment-related information.
- **Education Information:** education information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99).
- **Inferences:** inferences drawn from any of the information identified above to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behaviour, attitudes, intelligence, abilities, and aptitudes.

We may use the categories of personal information listed above for the purposes described in the [Adelphi Privacy Policy](#). In addition, we may use these categories of personal information for certain business purposes specified in the CCPA, as described in the following table.

Purposes	Categories of Personal Information (see the section ‘Notice of collection and use of personal information’ for a description.)
Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, providing analytics services, or providing similar services.	<ul style="list-style-type: none"> <li>• Identifiers;</li> <li>• Additional Data Subject to Cal. Civ. Code § 1798.80;</li> <li>• Protected Classifications;</li> <li>• Commercial Information;</li> <li>• Online Activity;</li> <li>• Geolocation Data;</li> <li>• Sensory Information;</li> <li>• Employment Information; Education Information and Inferences.</li> </ul>
Auditing related to a current interaction with you and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying position and quality of ad impressions and auditing compliance.	<ul style="list-style-type: none"> <li>• Identifiers;</li> <li>• Additional Data Subject to Cal. Civ. Code § 1798.80;</li> <li>• Protected Classifications;</li> <li>• Commercial Information;</li> <li>• Online Activity;</li> <li>• Geolocation Data;</li> <li>• Sensory Information;</li> <li>• Employment Information;</li> <li>• Education Information and Inferences.</li> </ul>

<p>Short-term, transient use, including, but not limited to, the contextual customization of ads shown as part of the same interaction.</p>	<ul style="list-style-type: none"> <li>• Identifiers;</li> <li>• Additional Data Subject to Cal. Civ. Code § 1798.80;</li> <li>• Protected Classifications;</li> <li>• Commercial Information;</li> <li>• Online Activity;</li> <li>• Geolocation Data;</li> <li>• Sensory Information;</li> <li>• Employment Information;</li> <li>• Education Information and Inferences.</li> </ul>
<p>Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.</p>	<ul style="list-style-type: none"> <li>• Identifiers;</li> <li>• Additional Data Subject to Cal. Civ. Code § 1798.80;</li> <li>• Protected Classifications;</li> <li>• Commercial Information;</li> <li>• Online Activity;</li> <li>• Geolocation Data;</li> <li>• Sensory Information;</li> <li>• Employment Information; Education Information and Inferences.</li> </ul>
<p>Debugging to identify and repair errors that impair existing intended functionality.</p>	<ul style="list-style-type: none"> <li>• Identifiers;</li> <li>• Additional Data Subject to Cal. Civ. Code § 1798.80;</li> <li>• Protected Classifications;</li> <li>• Commercial Information;</li> <li>• Online Activity;</li> <li>• Geolocation Data;</li> <li>• Sensory Information;</li> <li>• Employment Information; Education Information and Inferences.</li> </ul>
<p>Undertaking internal research for technological development and demonstration.</p>	<ul style="list-style-type: none"> <li>• Identifiers;</li> <li>• Additional Data Subject to Cal. Civ. Code § 1798.80;</li> <li>• Protected Classifications;</li> <li>• Commercial Information;</li> <li>• Online Activity;</li> <li>• Geolocation Data;</li> <li>• Sensory Information;</li> <li>• Employment Information; Education Information and Inferences.</li> </ul>

<p>Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us.</p>	<ul style="list-style-type: none"> <li>• Identifiers;</li> <li>• Additional Data Subject to Cal. Civ. Code § 1798.80;</li> <li>• Protected Classifications;</li> <li>• Commercial Information;</li> <li>• Online Activity;</li> <li>• Geolocation Data;</li> <li>• Sensory Information;</li> <li>• Employment Information; Education Information and Inferences.</li> </ul>
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In addition, we may also use the following categories of personal information for purposes of managing our career opportunities: Identifiers; Additional Data Subject to Cal. Civ. Code § 1798.80; Protected Classifications; Commercial Information; Online Activity; Geolocation Data; Sensory Information; Employment Information; Education Information and Inferences]

## Our prior collection, use and disclosure of personal information

We may have collected and used your personal information, as described in the section ‘Notice of collection and use of personal information’, during the disclosure period of 12 months preceding Adelphi’s receipt of your verifiable request. (Note the effective date of the California Consumer Privacy Act Jan 1<sup>st</sup>, 2020.)

For the personal information collected during that timeframe, we describe below:

- the categories of sources from which we may have obtained the personal information;
- the categories of third parties with whom we may have shared the information;
- the categories of personal information we may have sold;
- the categories of personal information we may have disclosed for a business purpose.

### Sources of personal information

We may have obtained personal information about you from various sources, as described below.

<p><b>Categories of Sources of Data Collection</b></p>	<p><b>Categories of Personal Information</b> (see the section ‘Notice of collection and use of personal information’ for a description.)</p>
<p>Directly from you, such as when you contact us to request information or when you participate in a research project or engage in our medical communications, medical education and publication programs.</p>	<ul style="list-style-type: none"> <li>• Identifiers;</li> <li>• Additional Data Subject to Cal. Civ. Code § 1798.80;</li> <li>• Protected Classifications;</li> <li>• Commercial Information;</li> <li>• Online Activity;</li> <li>• Geolocation Data;</li> <li>• Sensory Information;</li> <li>• Employment Information; Education Information and Inferences.</li> </ul>

<p>Our affiliates and subsidiaries</p>	<ul style="list-style-type: none"> <li>• Identifiers;</li> <li>• Additional Data Subject to Cal. Civ. Code § 1798.80;</li> <li>• Protected Classifications;</li> <li>• Commercial Information;</li> <li>• Online Activity;</li> <li>• Geolocation Data;</li> <li>• Sensory Information;</li> <li>• Employment Information;</li> <li>• Education Information and Inferences.</li> </ul>
<p>Vendors who provide services on our behalf</p>	<ul style="list-style-type: none"> <li>• Identifiers;</li> <li>• Additional Data Subject to Cal. Civ. Code § 1798.80;</li> <li>• Protected Classifications;</li> <li>• Commercial Information;</li> <li>• Online Activity;</li> <li>• Geolocation Data;</li> <li>• Sensory Information;</li> <li>• Employment Information; Education Information and Inferences.</li> </ul>
<p>Social networks</p>	<ul style="list-style-type: none"> <li>• Identifiers;</li> <li>• Additional Data Subject to Cal. Civ. Code § 1798.80;</li> <li>• Protected Classifications;</li> <li>• Commercial Information;</li> <li>• Online Activity;</li> <li>• Geolocation Data;</li> <li>• Sensory Information;</li> <li>• Employment Information; Education Information and Inferences.</li> </ul>
<p>Government entities</p>	<ul style="list-style-type: none"> <li>• Identifiers;</li> <li>• Additional Data Subject to Cal. Civ. Code § 1798.80;</li> <li>• Protected Classifications;</li> <li>• Commercial Information;</li> <li>• Online Activity;</li> <li>• Geolocation Data;</li> <li>• Sensory Information;</li> <li>• Employment Information; Education Information and Inferences.</li> </ul>

## Sharing of personal information

We may have shared your personal information with certain categories of third parties, as described below.

Categories of Third Parties	Categories of Personal Information
Our affiliates and subsidiaries	<ul style="list-style-type: none"> <li>• Identifiers;</li> <li>• Additional Data Subject to Cal. Civ. Code § 1798.80;</li> <li>• Protected Classifications;</li> <li>• Commercial Information;</li> <li>• Online Activity;</li> <li>• Geolocation Data;</li> <li>• Sensory Information;</li> <li>• Employment Information; Education Information and Inferences.</li> </ul>
Vendors who provide services on our behalf	<ul style="list-style-type: none"> <li>• Identifiers;</li> <li>• Additional Data Subject to Cal. Civ. Code § 1798.80;</li> <li>• Protected Classifications;</li> <li>• Commercial Information;</li> <li>• Online Activity;</li> <li>• Geolocation Data;</li> <li>• Sensory Information;</li> <li>• Employment Information;</li> <li>• Education Information and Inferences.</li> </ul>
Professional services organizations, such as auditors and law firms	<ul style="list-style-type: none"> <li>• Identifiers;</li> <li>• Additional Data Subject to Cal. Civ. Code § 1798.80;</li> <li>• Protected Classifications;</li> <li>• Commercial Information;</li> <li>• Online Activity;</li> <li>• Geolocation Data;</li> <li>• Sensory Information;</li> <li>• Employment Information;</li> <li>• Education Information and Inferences.</li> </ul>
Our business partners	<ul style="list-style-type: none"> <li>• Identifiers;</li> <li>• Additional Data Subject to Cal. Civ. Code § 1798.80;</li> <li>• Protected Classifications;</li> <li>• Commercial Information;</li> <li>• Online Activity;</li> <li>• Geolocation Data;</li> <li>• Sensory Information;</li> <li>• Employment Information;</li> <li>• Education Information and Inferences.</li> </ul>

<p>Internet service providers</p>	<ul style="list-style-type: none"> <li>• Identifiers;</li> <li>• Additional Data Subject to Cal. Civ. Code § 1798.80;</li> <li>• Protected Classifications;</li> <li>• Commercial Information;</li> <li>• Online Activity;</li> <li>• Geolocation Data;</li> <li>• Sensory Information;</li> <li>• Employment Information;</li> <li>• Education Information and Inferences.</li> </ul>
<p>Data analytics providers</p>	<ul style="list-style-type: none"> <li>• Identifiers;</li> <li>• Additional Data Subject to Cal. Civ. Code § 1798.80;</li> <li>• Protected Classifications;</li> <li>• Commercial Information;</li> <li>• Online Activity;</li> <li>• Geolocation Data;</li> <li>• Sensory Information;</li> <li>• Employment Information;</li> <li>• Education Information and Inferences.</li> </ul>
<p>Government entities</p>	<ul style="list-style-type: none"> <li>• Identifiers;</li> <li>• Additional Data Subject to Cal. Civ. Code § 1798.80;</li> <li>• Protected Classifications;</li> <li>• Commercial Information;</li> <li>• Online Activity;</li> <li>• Geolocation Data;</li> <li>• Sensory Information;</li> <li>• Employment Information;</li> <li>• Education Information and Inferences.</li> </ul>
<p>Operating systems and platforms</p>	<ul style="list-style-type: none"> <li>• Identifiers;</li> <li>• Additional Data Subject to Cal. Civ. Code § 1798.80;</li> <li>• Protected Classifications;</li> <li>• Commercial Information;</li> <li>• Online Activity;</li> <li>• Geolocation Data;</li> <li>• Sensory Information;</li> <li>• Employment Information;</li> <li>• Education Information and Inferences.</li> </ul>



<p>Social networks</p>	<ul style="list-style-type: none"> <li>• Identifiers;</li> <li>• Additional Data Subject to Cal. Civ. Code § 1798.80;</li> <li>• Protected Classifications;</li> <li>• Commercial Information;</li> <li>• Online Activity;</li> <li>• Geolocation Data;</li> <li>• Sensory Information;</li> <li>• Employment Information;</li> <li>• Education Information and Inferences.</li> </ul>
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## Disclosure of personal information for a business purpose

We may have disclosed to third parties the following categories of personal information for a business purpose:

- Identifiers such as a real name, alias, postal address, unique personal identifier (such as a device identifier; cookies, beacons, pixel tags, mobile ad identifiers and similar technology; customer number, unique pseudonym, or user alias; telephone number and other forms of persistent or probabilistic identifiers), online identifier, internet protocol address, email address, account name, Social Security number, driver’s license number, passport number, and other similar identifiers
- Signature, physical characteristics or description, state identification card number, insurance policy number, education, bank account number, credit card number, debit card number, and other financial information, medical information, and health insurance information
- Characteristics of protected classifications under California or federal law, such as race, color, national origin, religion, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, medical condition, ancestry, genetic information, disability, citizenship status, and military and veteran status
- Internet and other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with websites, applications or advertisements
- Geolocation Data
- Audio, electronic, visual, and similar information
- Professional or employment-related information
- Education information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99)
- Inferences drawn from any of the information identified above to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behaviour, attitudes, intelligence, abilities, and aptitudes.

## California Consumer privacy rights

You have certain rights regarding our use and disclosure of your personal information, as described below. To exercise any of these rights please contact us using the contact details in section Contact details on page 9.

### Access

You may have the right to request, twice in a 12-month period, that we disclose to you the personal information we have collected, used, disclosed and sold about you during the past 12 months.

### Deletion

You have the right to request that we delete certain personal information we have collected from you.

### Opt-Out of Sale

**ADELPHI** do not sell, and have not sold in the previous 12 months, consumers' personal information.

### Verifying Requests

To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your personal information or complying with your request. If you request access to or deletion of your personal information, we may require you to provide us with information about you to verify your identity. The type of information that we ask for may vary depending on the type and sensitivity of the personal information we hold about you or that you request. If additional information is required to verify your request, we may contact you to provide us with that information before responding to your request for access or deletion.

In addition, if you ask us to provide you with specific pieces of personal information, we will require you to sign a declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request. If you designate an authorized agent to make an access, deletion or opt-out of sale request on your behalf (1) we may require you to provide the authorized agent written permission to do so, and (2) for access and deletion requests, we may require you to verify your own identity directly with us (as described above).

### Additional Information

If you choose to exercise any of your rights under the CCPA, you have the right to not receive discriminatory treatment by us. To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request. This Statement is available in alternative formats upon request. Please contact [compliance.team@adelphigroup.com](mailto:compliance.team@adelphigroup.com) to request this Statement in an alternative format.

## Contact details

**TOLL Free No:** 1-833-520-0506

**Email:** [compliance.team@adelphigroup.com](mailto:compliance.team@adelphigroup.com)

**Via post:**

Adelphi Group (UK office),  
ATTN: Compliance Department  
Adelphi Mill, Bollington,  
Cheshire SK10 5JB, UK

Adelphi Group (US office),  
ATTN: Compliance Department  
2005 S. Easton Road, Suite 300,  
Doylestown, PA 18901

**Via a form from this website** - [click here](#).

## Changes to this privacy statement

We keep this privacy statement under regular review and reserve the right to revise it at any time. Any changes we may make to this privacy statement in the future will be posted on this page. There is a date at the beginning of this policy which indicates the date it was updated. Please revisit this policy each time you consider giving personal information.