

Opus Interactive California Privacy Compliance Policy

Effective Date: August 12, 2025

Last Updated: August 12, 2025

Purpose

The purpose of this policy is to outline Opus Interactive's commitment to protecting the privacy and security of personal information collected from California residents, in compliance with the California Consumer Privacy Act (CCPA) of 2018 and the California Privacy Rights Act (CPRA) of 2020. This policy ensures transparency, safeguards consumer rights, and establishes procedures for handling personal information in accordance with the California Privacy Protection Agency (CPPA) requirements.

Policy

Opus Interactive is dedicated to complying with CCPA and CPRA regulations to protect the personal information of California residents, including employees, customers, and website visitors, where the company meets applicable thresholds (e.g., annual gross revenue exceeding \$25 million, handling data of 100,000+ consumers/households, or deriving 50%+ revenue from selling personal information). This policy governs the collection, use, disclosure, and protection of personal information, ensuring respect for consumer rights, transparency, data security, and non-discrimination.

Scope

This policy applies to all personal information collected, processed, or maintained by Opus Interactive from California residents, as defined by CCPA/CPRA.

Consumer Rights

Opus Interactive upholds the following rights for California residents:

1. **Right to Know:** Access to details about categories and specific pieces of personal information collected, used, disclosed, or sold.
2. **Right to Delete:** Ability to request deletion of personal data, subject to legal exceptions.
3. **Right to Opt-Out:** Option to opt out of the sale of personal information, where applicable.

4. **Right to Correct:** Ability to request correction of inaccurate personal information.
5. **Right to Limit Use of Sensitive Personal Information:** Restriction of sensitive data use (e.g., health, financial details) to necessary service purposes, unless authorized.

Transparency and Notices

Opus Interactive provides a clear, accessible Privacy Notice on its website ([insert URL]), detailing:

- Categories of personal information collected (e.g., names, contact details, payment data).
- Purposes for collection (e.g., service delivery, security).
- Categories of third parties with whom data is shared (e.g., service providers, auditors).
- Instructions for exercising consumer rights.
- An opt-out link for data sales, if applicable, with a commitment not to sell data without consent.

Data Security and Accountability

- Opus Interactive leverages over 28 years of experience to implement robust security measures, including encryption, access controls, and regular risk assessments, aligned with ISO 27001, SOC 2, and HIPAA frameworks.
- Annual cybersecurity audits are conducted for businesses handling sensitive data of 100,000+ consumers/households, as required by CPRA.
- Data processing agreements with third parties comply with CCPA/CPRA, prohibiting unauthorized use or disclosure.

Non-Discrimination

Opus Interactive does not discriminate against consumers exercising their privacy rights, such as by denying services or altering pricing, unless permitted by law.

CPPA Oversight

Opus Interactive cooperates fully with the California Privacy Protection Agency (CPPA) for investigations or record requests, maintaining documentation to demonstrate compliance.

Procedure

1. Exercising Consumer Rights
 - Submission: California residents may submit requests to exercise their rights via:
 - Email: legal@opusinteractive.com
 - Phone: 503-972-6690
 - Website: www.opusinteractive.com
 - Verification: Opus Interactive will verify the requester's identity to ensure data security, using reasonable methods (e.g., matching provided information with existing records).

- Response: Requests will be acknowledged within 10 business days and fulfilled within 45 days, with a possible 45-day extension if notified, as per CCPA/CPRA requirements.
- Exceptions: Deletion requests may be denied if data retention is required for legal, operational, or contractual obligations, with an explanation provided to the requester.

2. Transparency and Notice

- The Privacy Notice is updated annually or as needed to reflect changes in data practices and is accessible at [insert URL].
- Employees and contractors are trained annually on CCPA/CPRA compliance and notice requirements.
- An opt-out link for data sales (if applicable) is prominently displayed on the website.

3. Data Security

- Risk Assessments: Conduct quarterly risk assessments to identify and mitigate vulnerabilities in data handling processes.
- Audits: Perform annual cybersecurity audits, with results reviewed by the Privacy Officer to ensure CPRA compliance.
- Third-Party Agreements: Review and update data processing agreements with vendors annually to ensure CCPA/CPRA compliance.

4. Handling Inquiries and Complaints

- Residents may contact the Privacy Officer for questions or concerns:
 - Privacy Officer: Eric Hulbert, President
 - Address: 8135 NE Evergreen Pkwy Hillsboro, Oregon 97124
 - Email: legal@opusinteractive.com
 - Phone: 503-972-6690
- Complaints are logged and investigated within 30 days, with resolutions communicated to the complainant.

5. CPPA Cooperation

- Maintain records of consumer requests, data processing activities, and audit results for at least 24 months, as required by CPPA.
- Respond to CPPA inquiries within the specified timeframe, providing requested documentation promptly.

Contact Information

For questions or concerns about this policy or CCPA/CPRA compliance, contact:

- Privacy Officer: Eric Hulbert, President
- Address: 8135 NE Evergreen Pkwy Hillsboro, Oregon 97124
- Email: legal@opusinteractive.com
- Phone: 503-972-6690