

California Consumer Privacy Act

Disclosures

Last Modified: April 29, 2022

Effective Date: May 16, 2022

The California Consumer Privacy Act (CCPA) requires us to disclose categories of Personal Information we collect and how we use it, the categories of sources from whom we collect Personal Information, and the third parties with whom we share it, which we have explained above. This notice supplements information contained in our [Privacy Policy](#) and applies solely to residents of the State of California (“consumers” or “you”). Any terms defined in the California Consumer Privacy Act of 2018, as amended from time to time (“CCPA”) have the same meaning when used in this notice and policy. This notice and policy does not reflect our collection, use, or disclosure of California residents’ personal information, or data subject rights, where an exception under the CCPA applies. You can download a pdf version of the notice and policy [here](#).

1. Your Rights To Access And Deletion

Access. You have the right to request a copy of the personal information we collect, use, or disclose about you. You can submit a request for this information via our [Knowledge Center article](#).

Deletion. You also have the right to request the deletion of personal information. You can submit a request for the deletion of personal information via our Knowledge Center using this [form](#). Alternatively, you can send your request to us at the address noted in Section 6 of this Disclosure.

Verification. Clubhouse may ask you to provide certain information to verify your identity. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue. Clubhouse will respond to your request in accordance with the CCPA. If we deny your request, we will explain why.

Exceptions. In accordance with the CCPA, Clubhouse will not provide the following information in response to access requests for the following reasons:

- Account data such as account passwords and identity verification codes, unmasked phone numbers, or email addresses, because of the sensitive nature of the information.
- Other users' and employees' personal information, including the names and account information of individuals who may have invited you to the app, other users' feedback, and employees' comments because the information belongs to other persons and disclosing it may impact their rights.
- Internal proprietary attributes that enable us to provide various aspects of our app, including channel and room customization, suspension decisions, and content suggestions, because the information is protected by federal and state trade secret law.
- Server logs that are older than 30 days because we use these to ensure the security and integrity of our app.

Clubhouse does not sell the personal information of its users. When a business sells your personal information, you have a right to opt out. Clubhouse does not sell, and in the preceding 12 months did not sell, California residents' personal information. Clubhouse does not have actual knowledge that it sells the personal information of minors under 16 years of age.

2. Personal Information Handling Practices

Below you will find a list of the categories of personal information we collect about California residents and have collected in the preceding 12 months. For each category of personal information we have collected, we reference to the enumerated category or categories of personal information in the CCPA that most closely describe the personal information

CCPA Category	Category Of Personal Information We Collect
Identifiers	Name, username, telephone number, e-mail address, IP address, profile picture, purchase or transaction history, information provided in user's profile or bio
Categories listed in the California Customer Records Act (Cal. Civ. Code § 1798.80(e))	Name, username, date of birth, telephone number, e-mail address, IP address, profile

	<p>picture, purchase or transaction history, preferred language, interests, app usage and activity information, following and follower lists, contact lists (hashed telephone numbers only), information from user's other social media accounts (if user chooses to connect them), messages sent and received from other Clubhouse users, questions or feedback sent to Clubhouse</p>
<p>Characteristics of protected classifications under California or federal law</p>	<p>Age</p>
<p>Commercial information</p>	<p>Purchase or transaction history, interests, app usage and activity information, following and follower lists, contact lists (hashed telephone numbers only), questions or feedback sent to Clubhouse</p>
<p>Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web website, application, or advertisement</p>	<p>IP address, domain name, browsing history, browser type and settings, operating system, network information, service provider, signal strength, device type, device memory, device's call log data, unique application identifier, unique device identifier, apps installed on device, time of visit, duration of visit, date and time stamps of actions</p>
<p>Geolocation data</p>	<p>IP address</p>
<p>Audio, electronic, visual, thermal, olfactory, or similar information</p>	<p>Recordings of conversations in Clubhouse rooms</p>
<p>Professional or Employment related information</p>	<p>Information that may be supplied in user's bio</p>
<p>Education Information</p>	<p>Information that may be supplied in user's bio</p>
<p>Inferences drawn from the information above</p>	<p>Information about user activity used to personalize recommendations regarding rooms or clubs a user might join, people a user might know, or other content a user might enjoy on Clubhouse.</p>

Clubhouse collects this personal information from the following sources:

- **Information Provided By You.** When you use Clubhouse, we collect personal information that you provide to us. When you set up an account, we may ask you to provide information about yourself, including your name, phone number, email address, and date of birth. “Account Data.” We may also ask you to provide us with some additional personal information that will be publicly visible in our Products, such as a profile picture, a bio in your profile to tell other Clubhouse users more about you, and topics you’re interested in. You may also choose to connect your other social media accounts, and sync your contacts. If you choose to send money to other users, you will be asked to provide a debit or credit card number and other account information.
- **Information We Get From You When You Use Our Products.** When you use our Products, we collect additional personal information based on your activity and other personal information you might choose to disclose. As discussed in our Privacy Policy, this may include usage and activity information, conversations, messages, other communications, transaction data, contacts, log data and device information, and cookie data. Clubhouse may collect information from the computer, tablet, phone, or other device that you install our mobile application on, that you use to access our Products, or that you use to open an email or click on an advertisement from Clubhouse. Clubhouse does not respond to “do not track signals.”
- **Information From Third Parties.** If you link your Clubhouse account to Twitter, Instagram, or any other social media services, we may receive information from those other services. The information we receive will depend on the privacy settings on those other services. We may also receive information about you from our service providers.

Clubhouse collects, uses, retains, and discloses this personal information for the following purposes:

- Register your account, verify your identity, and verify the accuracy of your information.
- Develop, operate, improve, deliver, maintain, and protect our Products.
- Personalize our Products by showing you relevant content, connecting you to users, clubs, rooms, and other content we think you might like, and to help you and your friends connect with one another on Clubhouse.

- Send you communications via email or text message. For example, we may use email or text messages to respond to support inquiries, share information about our Products, highlight content we think you might like, tell you about features we think you might like to hear about, or suggest ways to improve your Clubhouse experience.
- Monitor and enhance the safety and security of our Products
- Monitor and analyze user engagement, trends, and usage
- Assess the efficiency of our advertising campaigns on other platforms
- Handle and record consumer rights requests, including opt-ins and opt-outs
- Prevent fraud or other unauthorized or illegal activity
- Enforce, investigate, and report conduct violating our Terms of Service, Community Guidelines, or other policies
- Respond to requests from law enforcement agencies or other government agencies, and comply with legal or regulatory requirements

3. Sharing Of Personal Information

In the preceding 12 months, Clubhouse disclosed the above categories of personal information to the following categories of third parties for a business purpose, in some cases as directed by you:

- **Third parties and service providers that provide products or services to us.** In particular, companies that help us support our Products or provide services to you. Clubhouse may use third parties or service providers to process information on our behalf based on our instructions and for the purposes described in the Privacy Policy, audit interactions and transactions with you, address security, fix errors, assist with our advertising or marketing, maintain accounts and provide customer service, assist with our internal research, and verify service quality or safety.
- **Other online services you connect to your Clubhouse account.** If you link your Clubhouse account to Twitter, Instagram, or any other services, we may disclose your information to those other services at your direction when using our Products.
- **Government regulatory authorities.** We may disclose your personal information to relevant government regulatory authorities if we believe the disclosure is reasonably

necessary to comply with a law, regulation; protect the safety, rights or property of the public, or any person or Clubhouse; or to detect, prevent or otherwise address illegal conduct, fraud, technical or security issues.

4. Non-Discrimination

Clubhouse will not discriminate against you if you exercise your privacy rights.

5. Authorized Agent

In addition to exercising your rights yourself, you may also designate an authorized agent to make these requests under the CCPA on your behalf. In order to do this, we may ask you to verify the request directly using the phone number or email address connected to your account, or via other means. The information Clubhouse asks you to provide to verify your identity may depend on your prior interactions with us and the sensitivity of the personal information at issue.

6. Contact Information

If you have any questions or comments about this notice and policy, the ways in which we collect and use your personal information, or your choices and rights regarding such use, please do not hesitate to contact us via our Knowledge Center, or at the following address:

Alpha Exploration Co. Inc.
548 Market Street PMB 72878
San Francisco, California 94104
USA

Thank you for using Clubhouse!