

**Civitas Solutions, Inc.**  
**Privacy Notice for California Residents**

The California Consumer Privacy Act (“CCPA”) requires businesses subject to the CCPA to provide certain disclosures to California residents and also provides California residents with specific rights regarding their Personal Information unless an exception applies. This Privacy Notice for California Residents includes the CCPA disclosures applicable to Civitas Solutions, Inc. and its affiliated entities (“Company” or “We”).

**1. THE PERSONAL INFORMATION WE COLLECT**

As provided in our [Privacy Policy](#), we collect types of information which identify, relate to or is reasonably capable of being associated with a particular individual (“**Personal Information**”).

In the last twelve (12) months, the Company has collected the following categories of Personal Information:

| Category   | Examples of Information Under This Category<br><i>(*Not all of this information is collected by the Company)</i>  | Whether this Information is Collected                            |
|--|---|--|
| A. Identifiers   | A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, government issued identification number, or other similar identifiers.  | We collect Personal Information within this category.            |
| B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code section 1798.80(e)) | A name, signature, Social Security number, physical characteristics or description, address ,telephone number, government issued identification 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. | We collect Personal Information within this category.            |
| C. Protected classification 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).                                  | We do not collect any Personal Information within this category. |
| D. Commercial information  | Records of personal property, products or services purchased, obtained or considered, or other purchasing or consuming histories or tendencies.   | We do not collect any Personal Information within this category. |
| E. Biometric information   | Genetic, physiological, behavioral, and biological characteristics, fingerprints, faceprints and voiceprints.   | We do not collect any Personal Information within this category. |
| F. Internet or other   | Browsing history, search history, information on a  | We collect Personal  |

| Category   | Examples of Information Under This Category<br>(*Not all of this information is collected by the Company)  | Whether this Information is Collected                            |
|--|--|--|
| similar network activity   | consumer's interaction with a website, application or advertisement.   | Information within this category.                                |
| G. Geolocation data  | Physical location.   | We do not collect any Personal Information within this category. |
| H. Sensory data  | Audio, electronic, visual, thermal, olfactory, or similar information.   | We do not collect any Personal Information within this category. |
| I. Professional or employment-related information  | Current or past job history.   | We do not collect any Personal Information within this category. |
| J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.W. Section 1232g, 34 C.F.R. Part 99)) | Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records. | We do not collect any Personal Information within this category. |
| K. Inferences drawn from other personal information  | Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.  | We do not collect any Personal Information within this category. |

Personal Information does not include publicly available information from government records, de-identified or aggregated consumer information, or other information specifically exempted by statute (such as health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and other sector-specific privacy laws (including the Fair Credit Reporting Act, the Gramm-Leach-Bliley Act, the California Financial Information Privacy Act, and the Driver's Privacy Protection Act of 1994).

## 2. SHARING YOUR PERSONAL INFORMATION

- **Disclosures of Personal Information for a Business Purpose.** In the preceding twelve (12) month period, we have disclosed information within the following categories of Personal Information for a business purpose:
  - Category A: Identifiers
  - Category B: California Customer Records personal information categories
  - Category F: Internet or other similar network activity

In the preceding twelve (12) month period, we disclosed Personal Information for a business purpose to the following categories of third parties:

- Service providers
- Affiliated companies

- ***Sales of Personal Information.*** The Company does not sell any categories of Personal Information to any external parties that are considered to be a “third party” as such term is defined under California Civil Code section 1798.140, and the Company has not sold any Personal Information in the preceding twelve (12) months.

### 3. YOUR CALIFORNIA PRIVACY RIGHTS

#### **Consumer Requests: Your Rights and Choices About Personal Information Under California Law**

This section describes your CCPA rights and how to exercise those rights by submitting a consumer request (“**Consumer Request**”).

- ***Access to Specific Information and Data Portability Rights***

You have the right to request that the Company disclose certain or all of the following information to you about our collection and use of your Personal Information over the past twelve (12) months. Once we receive a verifiable Consumer Request, we will be able to disclose to you any of the following information if we have it:

- The categories of Personal Information we collected about you.
- The categories of sources for the Personal Information we collected about you.
- Our business or commercial purposes for collecting or selling that Personal Information.
- The categories of third parties to whom we disclosed that Personal Information.
- The specific pieces of Personal Information we collected about you (also may be called a data portability request).
- If we sold or disclosed your Personal Information for a business purposes, we will provide you with two lists disclosing (if applicable):
  - Sales, identifying the Personal Information categories that each category of recipient purchased; and
  - Disclosures for a business purpose, identifying the Personal Information categories that each category of recipient obtained.

- ***Deletion Request Rights***

You have the right to request that we delete any or all of your Personal Information that we collected from and about you, subject to certain statutory exceptions. Once we receive a verifiable Consumer Request, we will identify the Personal Information, confirm that you want that Personal Information deleted, and then delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies.

We may be unable to comply, or may deny, your deletion request if retaining the Personal Information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract(s) with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code section 1546 et. seq.)
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the

information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.

- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

- ***Non-Discrimination***

We will not discriminate against you for exercising any of your legal rights regarding your Personal Information, unless permitted by law. We will not take any of the following actions solely because you chose to exercise any of your legal rights regarding your Personal Information:

- Deny you services.
- Charge you different prices or rates for services, including through granting discounts or other benefits or imposing penalties.
- Provide you a different level or quality of services.
- Suggest that you may receive a different price or rate for services or a different level or quality of services.

- ***Disclosures for Direct Marketing***

California Civil Code Section § 1798.83 permits users of our Services that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please e-mail us at the address listed in the Contact Information section below.

### **How to Submit a Consumer Request**

To exercise your access, data portability, and deletion rights, please submit a Consumer Request to the contact information below. The Consumer Request must describe the request with sufficient detail that allows us to properly understand, evaluate and respond to it. Please specify if your Consumer Request pertains to all specific pieces of your Personal Information, or only with respect to the categories of Personal Information. You may only make a Consumer Request for access or data portability twice within a twelve (12) month period.

### ***How We Will Verify Consumer Requests***

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a Consumer Request related to your Personal Information. To designate an authorized agent, we will ask you provide us with legal documentation (such as power of attorney documentation) or written permission and the agent will need to verify their own identity with us.

We reserve the right to require you to provide additional information to enable us to reasonably verify that you are the person about whom the Personal Information pertains in order to release the requested information to you (or your authorized representative). If you have an account with us, you will be asked to use the standard authentication procedures to access your account. If you do not have an account with us, you will be asked to verify certain pieces of your Personal Information. If we are unable to verify your identity, we may be unable to provide you with information responsive to the request.

### ***How We Will Respond to Consumer Requests***

We endeavor to respond to verifiable Consumer Requests within forty-five (45) days after receipt. If we require more time (up to 45 days) we will inform you of the reason and extension in writing. We will deliver our written response(s) by mail or electronically, at your option. Any disclosures we provide will

only cover the 12-month period preceding receipt of the Consumer Request. If we deny (or cannot comply with) the Consumer Request, we will explain why. For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity. We do not charge a fee to process or respond to your Consumer Request unless such request is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why and provide you with a cost estimate before completing your request.

### **Contact for General Inquiries, Consumer Requests, and Requests to Change Information**

If you provided us with Personal Information and would like to exercise your access, data portability, deletion or other disclosure rights, or request changes to your information, please contact us in one of the following methods.

E-mail: [CCPA@thementornetwork.com](mailto:CCPA@thementornetwork.com)  
Telephone: 800-297-8043; TTY/TDD: 866-294-9572  
Mail: 313 Congress Street, 6<sup>th</sup> Floor, Boston, MA 02210  
Attn: General Counsel