

California Privacy Policy Addendum

Effective January 1, 2020, the California Consumer Privacy Act (“CCPA”) provides for several new rights related to your personal information as a California consumer (as that term is defined in the CCPA). This privacy policy addendum will set forth (i) our disclosure of the categories of data we have collected on our website over the past twelve (12) months; (ii) the sources of each of those categories of data; (iii) why and how we use your data, and with whom have we shared it in the past twelve (12) months; (iv) the new rights you may have under the CCPA; and (v) how to exercise your rights with respect to your personal information that Cubic has collected.

Please note that Cubic does not sell your personal information, so the sections of the CCPA which deal with your rights as they regard sale of your data do not apply and therefore are not addressed in this policy. We are obligated to update this privacy policy if our practices change and every twelve (12) months, so if those practices ever change, those changes will be posted here.

I. Categories of Data Collected

A. Identifiers.

Depending on the extent to which you have engaged with us, we (and our service providers) may have collected the following personal information in the past twelve (12) months:

- Your name
 - Your postal address
 - Your email address
 - Your telephone and fax numbers
 - Your company
 - Your site preferences
 - Your comments and questions entered into the Cubic website form or emailed to Cubic
- B. Internet/Electronic Activity.**

We (and our service providers) have also used certain technologies to automatically collect the following information if you have visited our site in the last twelve (12) months:

- Technical information, including your browser type and version, location and time zone setting, browser plug-in types and versions, operating system and platform, page response times and download errors;
- Information about your visit, including the websites you visit before our websites and products or services you viewed or searched for;

- Number of visits, length of visits to certain pages, pages viewed, page interaction information (such as scrolling, clicks and mouseovers) and methods used to browse away from the page; and
- similar information for additional content that can be accessed from website pages, such as opening or printing documents or which videos are played and for how long

Cubic does not use cookies on its website.

II. Source of Data Collected

Cubic collects personal information directly from you. We collect your personal information if you subscribe to Cubic’s news and updates on our main page at www.cubic.com, or if you fill out the text box on our “Contact” page, at <https://www.cubic.com/about/contact>.

Cubic uses Google Analytics to automatically collect the technical information specified in Section I(B) above.

III. Why and How We Use Your Data

A. Purposes of our Data Collection.

We use the personal information we collect from and about you for a variety of purposes, as set out below:

Purpose	Information
To ensure that content from our websites are presented in the most effective manner for you and your computer.	We use certain personal information (such as details of your device, IP address and website usage information) to ensure that content from our website is presented in the most effective manner for you and your computer
To set up and manage your website registration.	We use certain personal information (such as name, email address, IP address, website usage information) to set up and manage your website registration.
To provide the company you represent (or you directly) with requested products or services, and subsequent client care.	We use certain personal information (such as name and email address) to provide the company you represent (or you directly) with requested products or services.
To deal with your queries and requests, including to identify you when you contact us.	We use your personal information (such as your contact details) to assist you with inquiries and requests and to identify you when you contact us.
To allow you to participate in interactive features of our service (including any surveys) when you choose to do so.	We use your personal information (such as your contact details) to allow you to participate in interactive features of our service.

To provide you with information about our products and services (provided you have consented to this when required).	We use your personal information which you have provided to us (such as your email address or other contact details) to send you information about Cubic products and services you might be interested in.
To design our products and services and to help us develop new services and products.	We may use nonidentifying information about your visit to our website, including browser type, scrolling patterns, device type, and country to ensure that our website content best suits our customers' needs.
To manage our risks to help identify illegal activity, as required under applicable law.	We may need to use your personal information to identify and investigate illegal or fraudulent activity.
To comply with legal and regulatory requirements.	We may need to use your personal information to comply with other legal and regulatory requirements.
To keep internal records and managing our relationship with you.	We will keep records of your personal information, such as your name, address, account details and marketing preferences, in order to administer our services and products and keep our records up to date.
To process your personal information where this is necessary to keep our websites safe and secure.	We may need to process your personal information in order to keep our websites safe and secure and protect against illegal or fraudulent activity such as cyber attacks.
To notify you about changes to our service.	We may need to process your personal information (such as your contact details) to notify you about changes to our service.
To keep an up-to-date suppression list where you have asked not to be contacted, in order for us to not inadvertently re-contact you.	We understand that you may prefer for us not to contact you with details of our products, services, or promotions. We keep records of your preferences to ensure that we do not contact you if you have asked us not to. We may need to process and hold certain personal information (such as your name and email address) in order to do this.
To allow you to subscribe and follow products or services you're interested in, and to use this information to personalize your web experience and provide monthly materials to which you have subscribed including email updates.	We will need to use your personal information (such as your email address or other contact details) to send you information about Cubic products or services you've asked to subscribe to and follow and so that we can provide you with personalized web and email experience.

B. Categories of Data Disclosed for a Business Purpose.

Cubic does not disclose to third parties or sell any information it collects from or about you.

IV. Understanding Your Rights

The CCPA provides new rights to California consumers. You are a California consumer if you are a California resident, regardless of whether or not you have a customer or any other relationship with Cubic.

A. Right to Know

You have the right to request disclosure of our data collection and sales practices in connection with your data, including the categories of personal information we have collected about you, the source of the information, our use of the information and, if the information was disclosed or sold to third parties, the categories of personal information disclosed or sold to third parties and the categories of third parties to whom such information was disclosed or sold. You have the right to request this specific personal information collected about you during the twelve (12) months before your request.

B. Right to Request Deletion

You have the right to request that Cubic delete your data. However, it may be necessary for us to maintain your personal information under certain circumstances. For example, we may not be able to delete your data if we require your data to complete a transaction with you, to provide a good or service to you, to comply with a legal obligation, to enable internal uses which are reasonably aligned with your expectations based on your relationship with the business, to detect security incidents or malicious, deceptive or fraudulent activity, or otherwise to use your personal information internally and lawfully in a way that is compatible with the context in which you originally provided the information and with the data retention exceptions provided under California law.

C. Right to Request Information Not Be Sold to Third Parties

You have the right to request that Cubic not sell your information to third parties. However, Cubic does not sell personal information to third parties, and will update this privacy policy if those practices change in the future.

D. Right not to be Discriminated Against Because You Exercise of Your Rights

The CCPA prohibits Cubic from discriminating against you for exercising your CCPA rights. This means that Cubic may not charge you a difference price, deny you goods or services, or impose penalties on you because you elected to exercise your rights.

V. How to Exercise Your Rights

We take our responsibilities to you under the CCPA very seriously. If you have any questions about this policy, or wish to exercise any of your rights, we have provided a few ways for you to do that.

If you would like to request the categories of data we hold about you, or request that we delete your data, you may email us at website@cubic.com. Cubic is bound by the CCPA to ensure all requests are verifiable, so please include your name and email address at a minimum so that we can follow up with you appropriately.

Upon receiving your request, we will promptly acknowledge receipt and begin the verification process. Once we are able to complete the verification process, we will provide you an estimate of when you can expect your request to be fulfilled; or, if we cannot comply with your request, we will inform of you of that and the reason(s) why in writing.