



TRUSTe Independent CCPA Validation Findings Letter

Expiration date: February, 26, 2027

To the Management of Altrata Inc.

Scope

TRUSTe, the Assurance division of TrustArc, Inc has reviewed practices that govern the services of Altrata Inc. ("Organization") as of February 26, 2026 against the CCPA Controls ("Controls"). These Controls are based on the mapping of the CCPA, to the [TrustArc Privacy & Data Governance \("P&DG"\) Framework](#). The Controls focus on measures for demonstrating that the processing of personal information conducted by Altrata Inc. is performed at a control effectiveness level consistent with the Controls. The Controls cover the following areas aligned with the **BUILD, IMPLEMENT** and **DEMONSTRATE** Standards set forth in the [TrustArc Privacy & Data Governance \("P&DG"\) Framework](#), for establishing, maintaining, and continually improving adherent data protection practices.:

1. **Processes**, including implied requirements for maintaining data inventory about California residents, and developing policies and processes for managing access and individual rights requests.
2. **Awareness and Training**, ensuring individuals responsible for handling individuals rights request receive training on CCPA requirements for handling such requests.
3. **Use, Retention and Disposal**, including data retention periods, de-identified data, restrictions on selling consumer data, and limited use of information collected for identity verification.
4. **Disclosure to Third Parties and Onward Transfer**, including practices relating to managing service providers such as requiring deletion of consumer personal information, appropriate contracts are in place, and assessments are conducted.
5. **Choice and Consent**, including Do Not Sell or Share Rights and consent to financial incentives.
6. **Access and Individual Rights**, including right to have business provide information regarding consumer's personal data, deletion, data portability and do not sell or share, and non-discrimination for exercising rights and mechanism to exercise rights.
7. **Transparency**, including privacy notices, clear access to privacy notices and mechanisms to exercise do not sell or share rights.
8. **Monitoring and Assurance**, including seeking guidance from CA State Attorney General on how to comply with CCPA.
9. **Security**, risk assessments, safeguards, and incident detection.

Organization's Responsibilities

In connection with the Validation, Altrata Inc. was responsible for providing information through a CCPA Validation Assessment regarding its practices and demonstrating with supporting evidence how it met the Controls.

Responsibilities of TRUSTe

Our responsibility was to determine whether Altrata Inc.'s CCPA Privacy Practices within the scope described above have met the Controls based on the information provided by the Organization. A member of the Assurance Department reviewed the CCPA Validation Assessment submitted by the Organization and the evidence provided to demonstrate that the Organization met the Controls upon the Organization having completed remediation of gaps identified by the member of the Assurance Department. We determined whether the provided evidence was sufficient to demonstrate that the Organization has met the Controls.

Inherent Limitations

Because of their nature and inherent limitations, practices-level measures of the Organization may not always operate effectively to meet the applicable Controls. Furthermore, our findings herein are subject to the risk that the Privacy Practices, or any component of the Organization's practices, may change or that practice-level measures implemented by the Organization may become ineffective or fail.

Findings

In our opinion, in all material respects, based on the descriptions and supporting evidence of practices-level measures identified in Altrata Inc.'s CCPA Validation Assessment:

- The applicable practices-level measures as further described in the accompanying CCPA Validation Report have been implemented as of February 26, 2026.
- The measures described in the CCPA Validation Assessment were suitably designed to provide reasonable assurance that the Controls would be met if the practices-level measures operated effectively as of February 26, 2026.

Restricted Use

This Findings Letter and the accompanying report is for the intended use of Altrata Inc. as of February 26, 2026:

- This Findings Letter and the accompanying CCPA Report, and any Summary, provided by TRUSTe may be used by the Organization until the expiration date listed below.
- Only the Findings Letter and accompanying CCPA Report represent the official validation determination of TRUSTe.
- Any modifications or alterations to the Findings Letter, the accompanying CCPA Report, or any Summary, from the versions of those documents issued by TRUSTe shall render those documents invalid.
- Organizations must undergo a new CCPA Validation in order to make any representations whatsoever as having been determined as being validated against the Controls by TRUSTe, or any subsidiary or successor in interest to TrustArc, after the expiration date.
- This Findings Letter can be shared with the Organization's customers, contractors, and other stakeholders until the expiration date.
- This Findings Letter, the accompanying report, and any Summary provided by TRUSTe may be published on the authorized corporate web site(s) of the Organization, as listed in the Annex to this Findings Letter.
- This Findings Letter expires on February 26, 2027.

This Findings letter and the accompanying report are not intended to be, and should not be used nor relied upon by anyone other than the Organization and, as determined in the sole discretion of the Organization, the Organization's customers, contractors and other permitted stakeholders.

ANNEX - Authorized Corporate Websites

<https://altrata.com>