



Independent CCPA Validation Findings Letter

To the Management of **Lusha Systems, Inc.**

Scope

TRUSTe LLC ("TRUSTe"), an independent subsidiary of TrustArc Inc ("TrustArc") has reviewed the **Privacy Program** of **Lusha Systems, Inc.** ("Organization") as of **April 6, 2024** against 66 CCPA Controls ("Controls"). These Controls are based on the mapping of the California Consumer Privacy Act (CCPA) to the TrustArc Privacy & Data Accountability Governance Framework. The Controls focus on measures for demonstrating that the processing of personal information conducted by **Lusha Systems, Inc.** is performed at a control effectiveness level consistent with CCPA requirements. The Controls cover the following nine areas aligned with the **BUILD, IMPLEMENT** and **DEMONSTRATE** Standards set forth in the TrustArc Privacy & Data Governance Accountability Framework, for establishing, maintaining, and continually improving CCPA compliant 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 requests 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 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, 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 rights.
8. **Monitoring and Assurance**, including seeking guidance from CA State Attorney General on how to comply with CCPA.
9. **Security**, including employee awareness, risk assessments, safeguards, and incident detection

Organization's Responsibilities

In connection with the Validation, **Lusha Systems, Inc.** was responsible for providing information through a CCPA Validation Assessment regarding its CCPA compliance practices and demonstrating with supporting evidence how it implemented the Controls.

Responsibilities of TRUSTe

Our responsibility was to determine whether **Lusha Systems, Inc.**'s CCPA Privacy Practices within the scope described above comply with the Controls based on the information provided by the Organization. A member of the TrustArc Global Privacy Solutions team reviewed the CCPA Validation Assessment submitted by the Organization and the evidence provided to demonstrate compliance with the Controls upon the Organization having completed remediation of gaps identified by TrustArc's Privacy Intelligence technology. TRUSTe determined whether the provided evidence was sufficient to demonstrate compliance with the Controls and validate that the Organization has met the applicable 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 the CCPA Validation Assessment:

- The applicable practices-level measures as further described in the accompanying CCPA Validation Report have been implemented as of **April 6, 2024**.
- 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 **April 6, 2024**.

Restricted Use

This Findings Letter and the accompanying report is for the intended use of **Lusha Systems, Inc.** as of **April 6, 2024**:

- This Findings Letter and the accompanying CCPA Validation 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 Validation Report represent the official validation determination of TRUSTe.
- Any modifications or alterations to the Findings Letter, the accompanying CCPA Validation 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 CCPA compliant by TRUSTe,

TrustArc, or any subsidiary or successor in interest to TRUSTe or 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 **April 6, 2025**.

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.

TRUSTe LLC
April 6, 2024