

CALIFORNIA PRIVACY STATEMENT

Effective Date: January 1, 2020

The Options Price Reporting Authority, LLC (“OPRA”, “we”, and “us”) is providing this California Privacy Statement to comply with the California Consumer Privacy Protection Act of 2018 (“CCPA”) and other applicable California statutes and any terms used below that are defined in a statute shall have the statutory meaning. This California Privacy Statement supplements the information contained in our general Privacy Policy published on our website at <https://www.opraplan.com/privacy-policy> (the “General Privacy Policy”) and applies only if personal information you submit to us is within the scope of the CCPA or other applicable California statute, which may be the case where we receive personal information from individuals in the State of California, USA. In the event of any conflict between this California Privacy Statement (if applicable) and our General Privacy Policy, this California Privacy Statement shall prevail.

Categories of Personal Information Collected

The sections of our [General Privacy Policy](#) entitled “Data Collection and Dissemination” and “Usage Information” give details about the personal information we collect. The personal information that we have collected from consumers in the twelve months prior to the effective date of this California Privacy Statement fall into the following categories established by the CCPA:

- Personal identifiers such as name, postal address, phone numbers, unique personal identifier, online identifier, Internet Protocol (IP) address, email address, and account ID.
- Financial, information such as bank account number or payment card information.
- Commercial information such as records of data or services obtained or considered, and information on interactions with our offerings.
- Internet or other network activity information and information regarding your interactions with our services, websites or other offerings.
- Inferences drawn from any of the above information categories, including information about user preferences, characteristics, predispositions, behavior, and attitudes that we collect via our websites or other offerings or obtain from third parties in order to personalize content.

Sources of Personal Information

We obtain the types of personal information listed above from the following categories of sources:

- directly from our subscribers or prospective subscribers. For example, from information that our subscribers provide related to a contract or service application, from forms on the OPRA website, from surveys, in connection with an audit, or submitting a query to us.
- directly and indirectly from activity on our websites and other offerings. For example, from submissions through our website or information collected automatically from use of our website.
- from publicly available sources.

- from market data vendors or Service Providers, including payment processors.

Purposes for Collecting Personal Information

We may use or disclose the personal information we collect for the purposes identified in the section of our [General Privacy Policy](#) entitled “Data Collection and Dissemination” which include one or more of the following:

- providing our data and services to you or the business you represent,
- maintaining our business relationship and/or providing ongoing support, where you or the business you represent are a user of our offerings or services or a subscriber, or you otherwise engage with us for business purposes,
- informing you about our offerings and services, educating you about U.S. listed options, and responding to your comments or requests for information,
- enforcing any contracts that we enter into with you or the business you represent, or defending claims arising from such contracts,
- operating, maintaining, improving, administering and providing our offerings, including monitoring, customizing, enhancing, and optimizing our offerings and website and subscriber experience,
- safety and security purposes, including where necessary to protect the rights, property or safety of us or other users, data providers or subscribers,
- where we are obligated, or permitted, to do so by applicable law, regulation, industry guidelines, internal policies or legal process, including disclosure to governmental authorities, or
- as described to you when collecting your personal information.

Categories of Personal Information Shared or Sold

We may share or disclose the personal information that we collect for the purposes identified in the section of our [General Privacy Policy](#) entitled “What Data OPRA Shares.” In the twelve months prior to the effective date of this California Privacy Statement we have not sold any personal information of consumers. The personal information that we have disclosed about consumers for a business purpose in the twelve months prior to the effective date of this California Privacy Statement fall into the following categories established by the CCPA:

- Personal identifiers;
- Financial information;
- Commercial information;
- Internet or other network activity;
- Inferences drawn from any of the above information categories.

The above categories of information have been disclosed to the following categories of third parties:

- Service providers performing services for us or assisting us to provide services to you, including our administrator (Cboe Exchange, Inc.);

- Our directors and managers;
- Financial institutions and payment processors;
- Third parties authorized by you.

Rights Under the CCPA

The CCPA grants California residents the following rights:

Right to Know and Data Portability

You can request information about how we have collected, used, shared, sold, disclosed and otherwise processed your personal information during the past 12 months, including the right to request the specific pieces of personal information that we possess.

Right of Deletion

You can request that we delete any of the personal information that we have collected from you. We may deny your deletion request pursuant to certain exceptions in the CCPA, and the response we provide will explain any reason for denying your request.

Right of Non-Discrimination

You have the right to not receive discriminatory treatment by us for exercising any of your CCPA rights.

Right to Opt-Out of Sale

You can opt-out of the sale of your personal information. We do not sell your personal information so we do not offer an opt-out.

Exercising Your Privacy Rights

To exercise your right to know or right of deletion, please submit a verifiable consumer request to us by either:

- calling us at (312) 786-7067, or
- sending us an email at opra@opraplan.com.

We reserve the right to confirm your California residency to process your requests. In accordance with the CCPA, we will need to confirm your identity to process your requests and we may require you to login to your account with us, provide information associated with your account or transactions with us, or require you to provide government identification, signed declarations and other proof of identity. You may designate an authorized agent to make a request on your behalf as provided under California law and we reserve the right to request proof of such authorization. You may also make a verifiable consumer request on behalf of your minor child. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm that the personal information relates to you, or if you do not provide us with sufficient detail to allow us to understand and respond to your request. Our response will explain any reasons we cannot comply with a request, if applicable.

Direct Marketing Disclosures

California's "Shine the Light" law (Civil Code Section 1798.83) requires businesses to respond to requests from California customers asking about the business's practices related to disclosing personal information to third parties for the third parties' direct marketing

purposes. We do not sell or provide your personal information to any third party for such third party's direct marketing purposes and therefore do not respond to such requests.

Do Not Track

We do not collect personally identifiable information about an individual user's online activities over time and across third party web sites, and therefore we do not currently employ a process for responding to "Do Not Track" (DNT) signals sent by web browsers, mobile devices, or other mechanisms. We do not have arrangements with any third parties (such as third-party advertising networks and social media platforms) authorizing them to collect information about your online activities over time and across different websites when you use our website.

Changes to Our Privacy Statement

We reserve the right to amend this California Privacy Statement from time to time as provided in our [General Privacy Policy](#).