

Medallia

- **What is the California Consumer Privacy Act of 2018 (CCPA)?**

Answer: The CCPA is largely focused on requiring businesses to inform consumers if their personal information is sold and allowing them to opt-out of that sale.

The CCPA also requires businesses that collect personal information about consumers to provide disclosure about what information it collects, how that information is used, and who the information is disclosed to.

Under the law, consumers have the right to request a copy of the personal information collected about them in the prior 12 months (commonly called “access requests”), and request deletion of the personal information collected about them (commonly called “deletion requests”)

- **What businesses does the CCPA affect?**

Answer: The CCPA applies to most companies that do business in California that collect personal information. The threshold criteria include that a business has at least \$25 million in annual revenue, or that it buys, sells, shares, or receives the personal information of more than 25,000 California consumers for ‘commercial purposes’.

- **Who is identified as a ‘consumer’ under the CCPA?**

Answer: Consumers are California residents (as defined in California law)

- **What is ‘personal information’ under the CCPA?**

Answer: Personal information under the CCPA is much more expansive than previous California law. In particular, the definition includes information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer. Specific examples include real name, email address, unique personal identifier, IP address, or account name.

- **What are ‘commercial purposes’ under the CCPA?**

Answer: Commercial purposes under the CCPA means advancing a person’s commercial or economic interests. Examples include convincing another person to buy goods or services, or enabling a commercial transaction.

- **What is meant by ‘selling’ personal information?**

Answer: Selling under the CCPA also has an expansive definition. It includes selling, renting, releasing, disclosing, disseminating, making available, transferring, or communicating a

consumer's personal information to another business or a third party for monetary or other valuable consideration.

The CCPA provides an exception to the definition of 'selling' for the activities of 'service providers'. Service providers receive and use personal information only as necessary to achieve business purposes, such as assisting with a business' operations.

For this 'service provider' exception to apply, the business who shares information with the service provider must provide appropriate notice, and the service provider must not further collect, sell or use the personal information except as necessary to achieve the business purpose.

- **How the does the CCPA apply to the work Medallia performs for its customers?**

Answer: Medallia collects personal information from consumers in providing a software platform called the "Medallia Experience Cloud" to our customers. In this activity, Medallia acts strictly as a "service provider" to our customers under the CCPA, and our customers are "businesses". As such, our customers bear the primary responsibility for ensuring that their processing of personal data is compliant with the CCPA.

In the Medallia Experience Cloud, Medallia collects customer data based on our customers' instructions. For example, our customers specify what consumers we should contact to provide feedback, when we should contact them (e.g., after completing a purchase at a customer's retail store), how we should contact them (e.g., email or SMS), how often we should send them reminders to provide a response, and what questions are asked. Medallia's customers also decide how to use or respond to feedback that is collected.

- **Does Medallia 'sell' the personal information it handles for its customers?**

Answer: No, Medallia does not sell personal information it handles for its customers. Further, Medallia does not:

- process personal information for any commercial purpose other than providing our customers the products and services they have purchased; or
- retain, use or disclose personal information outside of the scope of the agreements we have with our customers.

We memorialize this commitment as part of our California Consumer Privacy Act Notice in [our privacy policy](#).

- **How has Medallia been preparing for the CCPA?**

Answer: Medallia has been preparing for compliance since the CCPA was passed in the summer of 2018. In particular, Medallia has privacy lawyers and a risk and compliance team that actively track the law and operationalize compliance throughout our business.

- **How do Medallia products support compliance with the CCPA?**

Answer: Medallia supports access and deletion requests by offering our clients product features, processes and assistance in exporting and deleting personal information about individuals. These product features and processes complete the data deletion within 30 days of receiving the request from our client.

In particular, for our core platform, you can work with your Medallia or partner professional services team to flag what fields you consider to be personal data. Our core platform then automates CCPA compliant deletion of consumer data if you receive requests from individuals. For example, you can send routinely load in a set of identifiers associated with CCPA deletion requests (such as email addresses), and then erase all fields marked as personal data from the records associated with those identifiers.

More information can be found [here](#) and in [Medallia's product documentation](#) (accessible only to Medallia users with their standard login)

- **Do Medallia's customer agreements specifically address the CCPA?**

Answer: If you would like to review and execute Medallia's CCPA addendum to its master subscription agreement, please email privacy@medallia.com with your company name and the name of your Medallia contract, and we will get back promptly.

- **How can Medallia customers ensure compliance with the CCPA?**

Answer: Medallia customers should consult with their own legal counsel to evaluate how the CCPA specifically applies to them and determine how to achieve their own compliance with the law. Factors to consider include:

- How the data you load into Medallia was collected (e.g., from an internal operational data source like a reservation system, or from a marketing list focused on promotions)
- The nature of your survey questions and invitations (e.g., whether they are focused on making operational improvements to your business, or focused on marketing efforts)
- How you plan to use the feedback that is collected with Medallia (e.g., whether it will be used to make operational improvements to your business, or shared with third parties as a 'sale' under the CCPA)