



CCPA and CPRA Compliance Statement

CCPA / CPRA

TROOTH, LLC CCPA-2026-001

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Entity	Trooth, LLC
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Reference Frameworks	California Consumer Privacy Act as amended by the CPRA; California Code of Regulations Title 11, Division 6

1. Executive summary

This statement sets out Trooth, LLC's position under the California Consumer Privacy Act as amended by the California Privacy Rights Act. The Company does not sell personal information and does not share it for cross-context behavioural advertising, so the "Do Not Sell or Share My Personal Information" link the statute requires of businesses that do is not one the Company needs; it says why here rather than staying silent. In respect of the personal information a customer places in the Trooth Network, the Company is a service provider under section 1798.140(ag) and processes it only on that customer's documented instructions.

2. Scope

Trooth, LLC (the Company) operates one product: the Trooth Network, a web application at trooth.co with a public API at api.trooth.co. A company connects its systems, the Network records what is true of them on a schedule with the source and the time of each observation, and buyers read that record. This statement covers that product, the production database that holds its data, the deployment pipeline that builds it, and the administrative accounts the Company holds with each provider named in its published Sub-processor List. It does not cover preview or development environments, which hold no customer data. As at the effective date the Company has no employees or contractors; every requirement written for personnel applies to the Founder today and to every future person from their first day.

3. Which role the Company holds

Personal information	Company's role	What that means
Account holders and workspace members; people who write to the Company	Business, section 1798.140(d)	The Company decides the purpose. This statement and the Privacy Policy govern.
Personal information inside a customer's own records in the Network	Service provider, section 1798.140(ag)	Processed only on the customer's documented instructions under a written contract that forbids retaining, using or disclosing it for any other purpose, and forbids combining it with information from another source except as section 1798.140(ag)(1) permits.

4. What is collected, why, and for how long

Category, section 1798.140(v)	Collected	Purpose	Kept for
Identifiers: name, work email, account identifier, IP address	Yes	Operating the account; security; rate limiting	Life of the account plus 30 days
Customer records: the content a customer creates in its workspace	Yes, as service provider	Delivering the Network on the customer's instructions	Life of the account plus 30 days
Commercial information	No	The Company takes no payment and holds no purchase history	Not held

Category, section 1798.140(v)	Collected	Purpose	Kept for
Internet activity: product usage, pages viewed within the account	Yes	Operating and improving the Network; security	24 months, rolling
Geolocation data	Coarse only, derived from IP for security and rate limiting	Security	7 days for rate-limiting counters
Biometric information, precise geolocation, and the other categories of sensitive personal information in section 1798.140(ae)	No	The Network is not built to receive them	Not held
Financial account or card information	No	The Company takes no payment; no payment processor is a sub-processor	Not held
Personal health information	No	The Network is not built to receive it	Not held
Inferences drawn to create a profile about a person	No	The Network records what is true of companies, not profiles of people	Not held

5. No sale, no sharing, no sensitive-information use requiring a limit

- The Company does not sell personal information for monetary or other valuable consideration.
- The Company does not share personal information for cross-context behavioural advertising. It runs no advertising, and its analytics are aggregate and carry no personal identifier.
- The Company collects no sensitive personal information for a purpose beyond those permitted by section 1798.121(d), so there is no "Limit the Use of My Sensitive Personal Information" right to exercise against it.

- Because there is no sale and no sharing, the Company publishes no "Do Not Sell or Share My Personal Information" link. It treats a Global Privacy Control signal as an opt-out of sale and sharing in any event, and there is nothing for it to stop.

6. Consumer rights and how to exercise them

Right	Section	How	Time
Know what is collected, used, disclosed	1798.100, 1798.110, 1798.115	privacy@trooth.co, or the account's own export	45 days; extendable once by 45 more with notice
Delete	1798.105	Closing the account, or privacy@trooth.co	45 days; live systems purged within 30, backups on a 30-day rolling expiry
Correct inaccurate personal information	1798.106	In the product, or privacy@trooth.co	45 days; usually immediately in the product
Portability, in a readily usable format	1798.130(a)(3)	privacy@trooth.co, or the account's own export	45 days
Opt out of sale or sharing	1798.120	Nothing to opt out of: the Company does neither	Not applicable
Limit use of sensitive personal information	1798.121	Not applicable: none is collected for a purpose that triggers the right	Not applicable
Non-retaliation for exercising a right	1798.125	The Company offers no financial incentive and charges no different price to a person who exercises a right	Continuous

A request may be made by an authorised agent with written permission the Company may verify with the consumer. Identity is confirmed against the account before anything is released; where the Company cannot verify identity to a reasonable degree of certainty it declines and explains why rather than guessing. Requests received as service provider are passed to the customer who controls the data within five business days.

7. Service provider obligations

Where the Company is a service provider its contract with the customer, the Data Processing Addendum at trooth.co/dpa, requires it to process personal information only for the business purposes specified, forbids retaining, using or disclosing it outside the direct business

relationship or for any commercial purpose of its own, forbids combining it with personal information from another source except as permitted, binds every sub-processor to the same terms in writing, and grants the customer the rights to take reasonable and appropriate steps to stop and remediate unauthorized use that section 1798.100(d) requires. The Company certifies its understanding of those restrictions by entering into that addendum.

8. Other United States state privacy laws

The comprehensive privacy laws of the other states, and the Company's position under each, are set out in the United States State Privacy Laws Statement (REG-02), which covers Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Montana, Delaware, Iowa, Nebraska, New Hampshire, New Jersey, Minnesota, Maryland, Tennessee, Indiana, Kentucky and Rhode Island. The Company's practices do not differ by state: it applies the most protective requirement it is subject to, to everyone.

Reference: California Civil Code sections 1798.100, 1798.105, 1798.106, 1798.110, 1798.115, 1798.120, 1798.121, 1798.125, 1798.130, 1798.135, 1798.140, 1798.185; California Code of Regulations Title 11, Division 6. Related: Privacy Policy; Data Processing Addendum; Sub-processor List; Data Retention Summary; REG-02.

Authorization

This statement is issued by Trooth, LLC under the authority of its Founder and Sole Member and describes the Company as it operates on its effective date. It is a published statement of the Company and requires no signature to bind it; the version published at trooth.co/security is the current one, and an earlier version, including any signed version of June 8, 2026, is superseded in full. It is not a certification and not an audit opinion: Trooth holds no audited certification against any framework and does not represent otherwise. Where this statement and the live service disagree, the service is corrected or the statement is re-issued, and the Company's published Trust Center states, control by control, what is in place and what is not.