Privacy Notice

California Consumer Privacy Act

Last Updated 4/18/2025

Privacy Policy

Introduction

"Citrin Cooperman" is the brand under which Citrin Cooperman & Company, LLP, a licensed independent CPA firm, and Citrin Cooperman Advisors LLC serve clients' business needs. The two firms operate as separate legal entities in an alternative practice structure. Citrin Cooperman is an independent member of Moore North America, which is itself a regional member of Moore Global Network Limited (MGNL).

This Privacy Notice describes how Citrin Cooperman and its subsidiary entities collect, use, share, sell, disclose, retain, dispose of, and protect Personal Information when you interact with us as a subscriber, client, prospective client, office visitor, website user, job applicant, employee, contractor, supplier, event attendee, or any other relevant individual, and describes the choices you have relating to your Personal Information and how to exercise such rights.

Applicability

This Privacy Notice supplements the <u>Citrin Cooperman Privacy Notice</u> and addresses state-specific disclosures required under the This California Consumer Privacy Act, ("CCPA"). This California Consumer Privacy Act, ("CCPA") Notice ("California Notice") describes how we handle your Personal Information, the reasons we do so, and the rights you have as a California resident regarding your information. This Privacy Notice supplements the <u>Citrin Cooperman Privacy Notice</u> and uses certain terms that have the meaning given to them in the California Consumer Privacy Act of 2018 (as amended by the California Privacy Rights Act of 2020) and its implementing regulations.

This Privacy Notice applies to any Personal Information you provide to Citrin Cooperman and any Personal Information we collect during your employment, when you apply to a job posting, contact us, visit, or use our website, "www.citrincooperman.com" and all websites linked to this website, when you visit a Citrin Cooperman office, attend a Citrin Cooperman event or seminar, or request a service from us. The Personal Information we collect varies depending on the nature of the services we provide and how you interact with us. To use this site, you do not need to send us any Personal Information.

In this Privacy Notice, "Personal Information," is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal Information includes, but is not limited to, the following if it identifies, relates to, describes, is reasonably capable of being associated with, or could be reasonably linked, directly or indirectly, with a particular consumer or household. Personal information does not include (i) publicly available information from government records, (ii) deidentified or aggregated consumer information, or (iii) information excluded from the CCPA's scope, such as (a) health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data, or (b) personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA), California Financial Information Privacy Act (FIPA), or the Driver's Privacy Protection Act of 1994.

This Privacy Notice applies to any Personal Information you provide to Citrin Cooperman and any Personal Information we collect when you contact us, visit, or use our website, "www.citrincooperman.com" and all websites linked to this website, visit a Citrin Cooperman office, attend a Citrin Cooperman event or seminar, or request a service from us. The Personal Information we collect varies depending on the nature of the services we provide and how you interact with us.

At Citrin Cooperman, we value your privacy and are committed to safeguarding your information as part of our ongoing dedication to providing a secure and transparent experience for our users. As a result, we are committed to keeping our Privacy Notice up to date, reflecting any changes in our Personal Information practices or the adoption of new privacy policies. Should you have any questions or concerns about our Privacy Notice or how we process your Personal Information, please do not hesitate to reach out to us.

Your Personal Information

At Citrin Cooperman, we offer a wide range of Assurance, Tax, and Advisory services to meet the business and personal needs of our clients. Given the diversity of our <u>Service offerings</u>, we process broad categories of Personal Information, including Sensitive Personal Information. We use your Personal Information for lawful business purposes, including (i) using only Sensitive Personal Information provided by you with your consent, (ii) performance of a contract, and/or (iii) complying with legal and regulatory obligations.

We also collect and use your Personal Information when you apply for a job to assess your suitability for job opportunities and provide you with personalized experiences. Additionally, we collect and use your Personal Information as an employee to manage the employment relationship, communicate with you, improve the workplace and our services, protect the health and safety of our employees, and comply with legal and regulatory requirements.

We process your Personal Information for the following purposes:

- To provide products and services to you
- To comply with legal/regulatory requirements
- To operate and improve our business
- To manage our workforce and provide them with employment, training, compensation, or benefits
- For marketing and advertising purposes
- To improve the security and performance of our website, network, systems and services
- To protect against fraud and abuse
- To protect the safety and security of our employees and clients
- To communicate with you about our products and services
- To operate and understand your use of our website

You may have executed a contract, such as a Master Services Agreement (MSA), Statement of Work (SoW), Engagement Letter or other Agreement, that governs the relationship between you and Citrin Cooperman and the services we provide to you. If there is any conflict between the terms of your agreement with Citrin Cooperman and the terms of this Privacy Notice, the terms of your agreement will prevail.

Type of Personal Information We Collect

We may have collected the following categories of Personal Information within the last twelve (12) months, including Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).

Browsing Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Internet or other electronic network activity information
- Geolocation data
- Inferences

Browsing time, cookie information, IP address, web beacons, device fingerprinting, imprecise geolocation information, web browsing history, search history, clickstream data, social media activity, ad tracking data, pixels, device unique identifier, browser type and settings, application usage data

We collect and process your Browsing Information for the following purposes:

- To understand your interests and needs.
- To improve the performance of our marketing campaigns.
- To improve the performance of our website.
- To personalize the content and advertising that we show to users.
- To prevent fraud and abuse.
- To comply with legal requirements.
- To improve the security of our website, systems, and services.

We use third parties to collect Browsing Information on our behalf, to improve the performance of our website and to personalize the content and advertising Yes that we show to you.

We may also collect your Browsing Information automatically through our use of cookies and other data collection technologies on our sites.

We collect and process your Contact Information for the following purposes:

- To market our products and services.
- To send you marketing materials.
- To verify your identity.
- To identify potential clients.
- To communicate with you about our products and services.
- To contact you about your account.
- To improve our securityTo improve our events.
- To invite you to our events or webinars.
- To fulfill our contractual obligations to you.
- To provide you with customer support.
- To process payments.
- To comply with legal requirements.
- To prevent fraud and abuse.
- To improve our products and services.

Contact Information is collected from Yes you and may also be collected from other third parties.

Contact Information

Identifiers

Internet or other

Geolocation data

electronic network

activity information

(Cal. Civ. Code §

1798.80(e))

Device Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Internet or other electronic network activity information
- Geolocation data
- Audio, electronic, visual, thermal, olfactory, or similar information
- Inferences

Device type and operating system, device unique identifier, IP address, audio, video, device fingerprints

Name, postal address, phone number, mailing

address, email address, physical location

We collect and process your Device Information for the following purposes:

- To provide you with our products and services.
- To improve our products and services that you have requested.
- To protect our systems and networks.
- To protect our users.
- To comply with legal requirements.
- To market our products and services to you.

Device Information is collected from you, other third parties or subscribers.

Yes We may also collect your Device Information automatically through our use of cookies and other data collection technologies on our sites.

Family Information

(Cal. Civ. Code § 1798.80(e))

- Customer records information
- Identifiers

Parent's name, dependents, and other household information

We collect and process your Family Information for the following purposes:

- To provide you with the products and services that you have requested.
- To improve our products and services.

Family Information is collected from you or your representatives you have authorized to provide us with your Personal Information.

		• To contact your family members in the event of an emergency.	
		We collect and process your Financial Detail Information for the following purposes:	
Financial Detail Information		 To process payments. To verify your identity. To conduct due	
(Cal. Civ. Code § 1798.80(e))	Bank account information, bank statements, compensation data, and other financial-related	diligence. • To protect our interests. • To negotiate	Financial Detail Information is collected from prospective corporate acquisitions,
 Identifiers Customer records information Commercial information 	details such as income, investments, benefits, tax status	 acquisitions. To provide you with the financial products and services that you have requested. To comply with legal requirements. To protect against fraud and abuse. 	No you, or your representatives you have authorized to provide us with your Personal Information.
Government Identifier Information		TAT 11 4 1	
(Cal. Civ. Code § 1798.80(e))		We collect and process your Government Identifier Information for the following purposes:	Government Identifier Information is
 Identifiers Customer records information Characteristics of protected classifications under California or federal law 	Driver's license, national identification number, passport number, social security number, national identity card details	 To verify your identity. To comply with legal requirements. To prevent fraud and abuse. 	collected from you or your No representatives you have authorized to provide us with your Personal Information.
		We collect and process your Personal Detail Information for the following purposes:	
Personal Detail Information		To provide products and services that you have	
(Cal. Civ. Code § 1798.80(e))		requested.To provide information that you have requested.	
 Identifiers Customer records information Characteristics of protected classifications under California or federal law 	Age, gender, date of birth, marital status, nationality, signature	 To provide event registration. To improve our products and services. To improve our events. To comply with legal requirements. To prevent fraud and abuse. To market our products and services. 	Personal Detail Information is collected from you and third parties you have authorized to provide us with your Personal Information.
Personal Health Information			
(Cal. Civ. Code § 1798.80(e))		We collect and process your Personal Health Information	
 Identifiers Customer records information Characteristics of protected classifications under California or federal law 	Information related to medical payment, medical claims data, medical history, products, or equipment used, health plan beneficiary, medical treatment	Fersonal Health Information for the following purposes:To assist in meal planning.	No Personal Health Information is collected from you or your representatives you have authorized to provide us with your Personal Information.
Professional Experience and Affiliation Information		We collect and process your Professional Experience and	Professional Experience and Affiliation
(Cal. Civ. Code § 1798.80(e))	Professional memberships, qualifications, certifications	Affiliation Information for the following purposes:	No representatives, and third parties you have authorized to provide us with your
• Customer records		 To provide you with the products and services 	Personal Information.

- information • Education information
- Professional or employment-related information
- Inferences

Sensitive Personal Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Customer records information
- Characteristics of protected classifications under California or federal law
- Biometric information
- Geolocation data
- Audio, electronic, visual, thermal, olfactory, or similar information

Driver's license number, social security number, passport numbers, credit and debit card numbers, log-in information for financial accounts, data on a consumer's religion, ethnicity, or race, geolocation data, biometric data, data about a consumer's sexual orientation or health, a consumer's mail, email, or texts

that you have requested. • To improve our products and services.

- To comply with legal requirements.
- To market our products and services to you.
- To prevent fraud and abuse.

We collect and process your Sensitive Personal Information for the following purposes:

- To provide you with the products and services you have requested.
- To improve our products and services.
- To comply with legal requirements such as anti-discrimination laws.
- To protect the safety of employees or others.
- To prevent fraud and abuse.
- With your consent, to market our products and services to you.

Sensitive Personal Information is collected from you or your No representatives you have authorized to provide us with your Personal Information.

Social Media Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Customer records information
- Commercial information
- Internet or other electronic network activity information
- Geolocation data
- Audio, electronic, visual, thermal, olfactory, or similar information
- Professional or employment-related information
- Inferences

We collect and process your Social Media Information for the following purposes: Social media accounts, social media content,

- To market our products and services to you.
- To improve our products and services.
- To comply with legal requirements.

Social Media Information is collected from you, your clients, or your representatives you have authorized to provide us with your Personal Information.

 $^{
m Yes}$ We may also collect your Social Media Information from third-party sources, such as social media platforms (if you interact with us through your social media account), cookies and other data collection technologies on our sites.

User Account Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Customer records information

Account age, account number, email address or username, account password

social media history, profile information, posts,

interactions, behavioral data, technical data

connections, likes, shares, comments,

We collect and process your **User Account Information for** the following purposes:

- To create and manage your account.
- To provide you with access to our products and services.
- To protect your account from unauthorized access.
- To improve our products and services.
- To comply with legal requirements.

User Account Information is collected from you.

No We may also collect your User Account Information from third-party payment processors, if used to process your payment for services rendered.

Data Category (Client Representatives)

Example Personal Identifiers

Purposes for Collection/Use **Shared with Third Parties**

Information We use third parties to collect Browsing

Sources of Personal

Browsing Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Internet or other

Browsing time, cookie information, IP address, web beacons, device fingerprinting, imprecise geolocation information, web browsing history, search history, clickstream data, social media activity, ad tracking data, pixels, device unique identifier, browser type and settings, application We collect and process your Browsing Information for the following purposes:

 To understand your interests and needs.

Information on our behalf, to improve the performance of our website and to Yes personalize the content and advertising that we show to you.

electronic network activity information

- Geolocation data
- Inferences

usage data

Contact Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Internet or other electronic network activity information
- Geolocation data

Name, postal address, phone number, mailing address, email address, physical location

Device Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Internet or other electronic network activity information
- Geolocation data
- Audio, electronic, visual, thermal, olfactory, or similar information
- Inferences

Device type and operating system, device unique identifier, IP address, audio, video, device fingerprints

Family Information

(Cal. Civ. Code § 1798.80(e))

- Customer records information
- Identifiers

Parent's name, dependents, and other household information

• To improve the performance of our marketing campaigns.

- To improve the performance of our website.
- To personalize the content and advertising that we show to users.
- To prevent fraud and abuse.
- To comply with legal requirements.
- To improve the security of our website, systems, and services.

We collect and process your Contact Information for the following purposes:

- To market our products and services.
- To send you marketing materials.
- To verify your identity.
- To identify potential clients.
- To communicate with you about our products and services.
- To contact you about your account.
- To improve our security
- To improve our events.
- To invite you to our events or webinars.
- To fulfill our contractual obligations to you.
- To provide you with customer support.
- To process payments.
- To comply with legal requirements.
- To prevent fraud and abuse.
- To improve our products and services.

We collect and process your Device Information for the following purposes:

- To provide you with our products and services.
- To improve our products and services that you have requested.
- To protect our systems and networks.
- To protect our users.
- To comply with legal requirements.
- To market our products and services to you.

We collect and process your Family Information for the following purposes:

- To provide you with the products and services that you have requested. No
- To improve our products and services.
- To contact your family members in the event of an emergency.

We may also collect your Browsing Information automatically through our use of cookies and other data collection technologies on our sites.

Contact Information is collected from Yes you and may also be collected from other third parties.

Device Information is collected from you, other third parties or subscribers.

Yes We may also collect your Device Information automatically through our use of cookies and other data collection technologies on our sites.

Family Information is collected from you or your representatives you have authorized to provide us with your Personal Information.

		We collect and process your Financial Detail Information for the following purposes:		
Financial Detail Information (Cal. Civ. Code § 1798.80(e)) • Identifiers • Customer records information • Commercial information	Bank account information, bank statements, compensation data, and other financial-related details such as income, investments, benefits, tax status	 To process payments. To verify your identity. To conduct due diligence. To protect our interests. To negotiate acquisitions. To provide you with the financial products and services that you have requested. To comply with legal requirements. To protect against fraud and abuse. 	No	Financial Detail Information is collected from prospective corporate acquisitions, you, or your representatives you have authorized to provide us with your Personal Information.
Government Identifier Information (Cal. Civ. Code § 1798.80(e)) • Identifiers • Customer records information • Characteristics of protected classifications under California or federal law	Driver's license, national identification number, passport number, social security number, national identity card details	We collect and process your Government Identifier Information for the following purposes: • To verify your identity. • To comply with legal requirements. • To prevent fraud and abuse.	No	Government Identifier Information is collected from you or your representatives you have authorized to provide us with your Personal Information.
Personal Detail Information (Cal. Civ. Code § 1798.80(e)) • Identifiers • Customer records information • Characteristics of protected classifications under California or federal law	Age, gender, date of birth, marital status, nationality, signature	 We collect and process your Personal Detail Information for the following purposes: To provide products and services that you have requested. To provide information that you have requested. To provide event registration. To improve our products and services. To improve our events. To comply with legal requirements. To prevent fraud and abuse. To market our products and services. 	No	Personal Detail Information is collected from you and third parties you have authorized to provide us with your Personal Information.
Personal Health Information (Cal. Civ. Code § 1798.80(e)) • Identifiers • Customer records information • Characteristics of protected classifications under California or federal law	Information related to medical payment, medical claims data, medical history, products, or equipment used, health plan beneficiary, medical treatment	We collect and process your Personal Health Information for the following purposes: • To assist in meal planning.	No	Personal Health Information is collected from you or your representatives you have authorized to provide us with your Personal Information.
Professional Experience and Affiliation Information (Cal. Civ. Code § 1798.80(e)) • Customer records information • Education information • Professional or	Professional memberships, qualifications, certifications	We collect and process your Professional Experience and Affiliation Information for the following purposes: • To provide you with the products and services that you have requested. • To improve our products and services.		Professional Experience and Affiliation Information is collected from you, your representatives, and third parties you have authorized to provide us with your Personal Information.

- employment-related information
- Inferences
- Sensitive Personal Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Customer records information
- Characteristics of protected classifications under California or federal law
- Biometric information
- Geolocation data
- Audio, electronic, visual, thermal, olfactory, or similar information

Driver's license number, social security number, passport numbers, credit and debit card numbers, log-in information for financial accounts, data on a consumer's religion, ethnicity, or race, geolocation data, biometric data, data about a consumer's sexual orientation or health, a consumer's mail, email, or texts

Social media accounts, social media content,

interactions, behavioral data, technical data

connections, likes, shares, comments,

social media history, profile information, posts,

We collect and process your Sensitive Personal Information for the following

abuse.

purposes:

 To comply with legal requirements.

• To market our products

and services to you.

To prevent fraud and

- To provide you with the products and services you have requested.
- To improve our products and services.
- To comply with legal requirements such as anti-discrimination laws.
- To protect the safety of employees or others.
- To prevent fraud and abuse.
- With your consent, to market our products and services to you.

Sensitive Personal Information is collected from you or your No representatives you have authorized to provide us with your Personal Information.

Social Media Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Customer records information
- Commercial information
- Internet or other electronic network activity information
- Geolocation data
- Audio, electronic, visual, thermal, olfactory, or similar information
- Professional or employment-related information
- Inferences

We collect and process your Social Media Information for the following purposes:

- To market our products and services to you.
- To improve our products and services.
- To comply with legal requirements.

Social Media Information is collected from you, your clients, or your representatives you have authorized to provide us with your Personal Information.

 ${}^{\displaystyle \operatorname{Yes}}$ We may also collect your Social Media Information from third-party sources, such as social media platforms (if you interact with us through your social media account), cookies and other data collection technologies on our sites.

User Account Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Customer records information

Account age, account number, email address or username, account password

We collect and process your User Account Information for the following purposes:

- To create and manage your account.
- To provide you with access to our products and services.
- To protect your account from unauthorized access.
- To improve our products and services.
- To comply with legal requirements.

User Account Information is collected from you.

No We may also collect your User Account Information from third-party payment processors, if used to process your payment for services rendered.

Data Category (Clients)

Example Personal Identifiers

Purposes for Collection/ Use

We collect and process your **Authenticating Information for** the following purposes:

Shared with Third

Parties

Sources of Personal Information

Authenticating Information

(Cal. Civ. Code § 1798.80(e))

• Identifiers

Passwords, PIN, mother's maiden name

- To authenticate your identity and grant you access to our services or
- systems. To prevent fraud and
- Authenticating information is collected from you or your representatives you have authorized to provide us with your Personal Information.

 To comply with legal requirements, such as those related to financial services or healthcare. To improve the security of our systems and services. • To improve your customer experience. We collect and process your **Beneficiary Contact Information** for the following purposes: To contact your beneficiary in the event of your death. • To provide information **Beneficiary Contact Information is** about benefits to your collected from you or your Name of beneficiary contact, telephone number **Beneficiary Contact** beneficiary. of beneficiary contact, address of beneficiary No representatives you have authorized to Information To comply with legal contact, relationship to individual provide us with your Personal requirements, such as Information. those related to employment law or tax law. To protect the privacy of your beneficiary contact information. We collect and process your **Background Check Information** Background Check for the following purposes: Information To understand your needs (Cal. Civ. Code § 1798.80(e)) and interests. To assess your suitability Identifiers for our products or • Customer records services. information To comply with legal **Background Check Information is** Characteristics of Criminal history, criminal records, driving requirements, such as collected from you and third parties you have authorized to provide us with your protected citations those related to anticlassifications under Personal Information. money laundering or California or federal know-your-customer law laws. Professional or To prevent fraud and employment-related abuse. information To improve our decision-• Education making about marketing information and sales. We collect and process your Browsing Information for the following purposes: • To understand your interests and needs. To improve the **Browsing Information** performance of our We use third parties to collect Browsing marketing campaigns. (Cal. Civ. Code § Information on our behalf, to improve Browsing time, cookie information, IP address, • To improve the 1798.80(e)) the performance of our website and to web beacons, device fingerprinting, imprecise performance of our personalize the content and advertising geolocation information, web browsing history, Identifiers website. that we show to you. search history, clickstream data, social media • Internet or other • To personalize the content activity, ad tracking data, pixels, device unique electronic network We may also collect your Browsing and advertising that we identifier, browser type and settings, application activity information Information automatically through our show to users. usage data use of cookies and other data collection • Geolocation data • To prevent fraud and technologies on our sites. • Inferences abuse. • To comply with legal requirements. • To improve the security of our website, systems, and services. We collect and process Clients' Children Information only with Children Information is collected from the consent of a parent or Names of children, age or gender of children, you or your representatives you have guardian for the following **Children Information** birth date, address of children, activities authorized to provide us with your purposes: associated with children Personal Information. To perform services and

abuse.

Contact Information (Cal. Civ. Code § 1798.80(e)) • Identifiers • Internet or other electronic network activity information • Geolocation data	Name, postal address, phone number, mailing address, email address, physical location	fulfill our contractual obligations to you. To comply with our legal obligation to protect the privacy of children. We collect and process your Contact Information for the following purposes: To register you as a new client. To market our products and services. To send you marketing materials. To verify your identity. To communicate with you about our products and services. To contact you about your account. To improve our security. To improve our events. To invite you to our events or webinars. To fulfill our contractual obligations to you. To provide you with customer support. To process payments. To comply with legal requirements. To prevent fraud and abuse. To improve our products and services.	Yes	Contact Information is collected from you and may also be collected from other third parties.
Device Information (Cal. Civ. Code § 1798.80(e)) • Identifiers • Internet or other electronic network activity information • Geolocation data • Audio, electronic, visual, thermal, olfactory, or similar information • Inferences	Device type and operating system, device unique identifier, IP address, audio, video, device fingerprints			Device Information is collected from you, other third parties or subscribers. We may also collect your Device Information automatically through our use of cookies and other data collection technologies on our sites.
Emergency Contact Information (Cal. Civ. Code § 1798.80(e)) • Customer records information • Identifiers	Name of emergency contact, contact information of emergency contact, relationship to individual, next of kin	We collect and process your Emergency Contact Information to contact your emergency contact in an emergency.	No	Emergency Contact Information is collected from you or your representatives you have authorized to provide us with your Personal Information.
Family Information (Cal. Civ. Code § 1798.80(e)) • Customer records information • Identifiers	Parent's name, dependents, and other household information	 We collect and process your Family Information for the following purposes: To provide you with the products and services that you have requested. To improve our products and services. To contact your family members in the event of an emergency. 	No	Family Information is collected from you or your representatives you have authorized to provide us with your Personal Information.

fulfill our contractual

		We collect and process your Financial Detail Information for the following purposes:		
Financial Detail Information		 To process payments. To verify your identity. To conduct due diligence.		
(Cal. Civ. Code § 1798.80(e))	Bank account information, bank statements,	To conduct due dingence.To protect our interests.To negotiate acquisitions.		Financial Detail Information is collected from prospective corporate
 Identifiers Customer records information Commercial information 	compensation data, and other financial-related details such as income, investments, benefits, tax status	 To provide you with the financial products and services that you have requested. To comply with legal requirements. To protect against fraud and abuse. 	No	acquisitions, you, or your representatives you have authorized to provide us with your Personal Information.
Government Identifier Information		We collect and process your		
(Cal. Civ. Code § 1798.80(e))		Government Identifier Information for the following purposes:		Government Identifier Information is
 Identifiers Customer records information Characteristics of protected classifications under California or federal law 	Driver's license, national identification number, passport number, social security number, national identity card details	 To verify your identity. To comply with legal requirements. To prevent fraud and abuse. 	No	collected from you or your representatives you have authorized to provide us with your Personal Information.
		We collect and process your Personal Detail Information for the following purposes:		
Personal Detail Information		• To provide products and services that you have		
(Cal. Civ. Code § 1798.80(e))		 requested. To provide information that you have requested. 		Developed Detail Information is called a
 Identifiers Customer records information Characteristics of protected classifications under California or federal law 	Age, gender, date of birth, marital status, nationality, signature, image/video, voice/audio recording	 To provide event registration. To improve our products and services. To improve our events. To comply with legal requirements. To prevent fraud and abuse. 	Yes	Personal Detail Information is collected from you and third parties you have authorized to provide us with your Personal Information.
		 To market our products and services. To provide products and services to you. Event management For marketing and advertising purposes. 		
Personal Health Information		We collect and process your Personal Health Information for the following purposes:		
(Cal. Civ. Code § 1798.80(e))		 To provide you with our products and services. To assist in meal planning. 		Porconal Health Information is
 Identifiers Customer records information Characteristics of protected classifications under California or federal law 	Information related to medical payment, medical claims data, medical history, products, or equipment used, health plan beneficiary, medical treatment	 To assist in meal planning. To improve our products and services. To improve our benefits. To communicate with healthcare providers. To comply with regulatory requirements. To prevent fraud and abuse. 	No	Personal Health Information is collected from you or your representatives you have authorized to provide us with your Personal Information.
Professional Experience and Affiliation Information	l	We collect and process your Professional Experience and Affiliation Information for the		Professional Experience and Affiliation
(Cal. Civ. Code § 1798.80(e))	Professional memberships, qualifications, certifications	following purposes: • To provide you with the	No	Information is collected from you, your representatives, and third parties you have authorized to provide us with your
• Customer records information		products and services that you have requested.		Personal Information.

- Education information
- Professional or employment-related information
- Inferences

Sensitive Personal Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Customer records information
- Characteristics of protected classifications under California or federal law
- Biometric information
- Geolocation data
- Audio, electronic, visual, thermal, olfactory, or similar information

Driver's license number, social security number, passport numbers, credit and debit card numbers, log-in information for financial accounts, data on a consumer's religion, ethnicity, or race, geolocation data, biometric data, data about a consumer's sexual orientation or health, a consumer's mail, email, or texts

We collect and process your Sensitive Personal Information for the following purposes:

• To improve our products

To comply with legal

• To market our products

and services to you.To prevent fraud and

and services.

requirements.

abuse.

- To provide you with the products and services you have requested.
- To improve our products and services.
- To comply with legal requirements such as anti-discrimination laws.
- To protect the safety of employees or others.
- To prevent fraud and abuse.
- With your consent, to market our products and services to you.
- To improve our benefits.
- To provide you with benefits.
- To communicate with healthcare providers.

Sensitive Personal Information is collected from you or your No representatives you have authorized to provide us with your Personal Information.

Social Media Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Customer records information
- Commercial information
- Internet or other electronic network activity information
- Geolocation data
- Audio, electronic, visual, thermal, olfactory, or similar information
- Professional or employment-related information
- Inferences

We collect and process your Social Media Information for the following purposes:

- To understand your interests and preferences.
- To personalize your experience.
 To market our product
- To market our products and services to you.
- To improve our products and services.
- To comply with legal requirements.

Social Media Information is collected from you, your clients, or your representatives you have authorized to provide us with your Personal Information.

Yes We may also collect your Social Media Information from third-party sources, such as social media platforms (if you interact with us through your social media account), cookies and other data collection technologies on our sites.

User Account Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Customer records information

Account age, account number, email address or username, account password

Social media accounts, social media content,

interactions, behavioral data, technical data

connections, likes, shares, comments,

social media history, profile information, posts,

We collect and process your User Account Information for the following purposes:

- To create and manage your account.
- To provide you with access to our products and services.
- To protect your account from unauthorized access.
- To improve our products and services.
- To comply with legal requirements.

User Account Information is collected from you.

No We may also collect your User Account Information from third-party payment processors, if used to process your payment for services rendered.

Data Category (Contractor)

Example Personal Identifiers Purposes for Collection/ Use Shared with Third Parties

Sources of Personal Information

Authenticating Information

(Cal. Civ. Code § 1798.80(e))

Passwords, PIN, mother's maiden name

We collect and process your Authenticating Information for the following purposes: Authenticating information is collected from you or your representatives you have authorized to provide us with your Personal

Identifiers

Background Check Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Customer records information
- Characteristics of protected classifications under California or federal law
- Professional or employment-related information
- Education information

Contact Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Internet or other electronic network activity information
- Geolocation data

Name, postal address, phone number, mailing address, email address, physical location

Criminal history, criminal records, driving

citations

Device type and operating system, device unique identifier, IP address, audio, video, device

fingerprints

 To authenticate your identity and grant you access to our services or systems.

- To prevent fraud and abuse.
- To comply with legal requirements, such as those related to financial services or healthcare.
- To improve the security of our systems and services.

Information.

We collect and process your **Background Check Information** for the following purposes:

> To prevent fraud and abuse.

Background Check Information is collected from you and third parties you have authorized to provide us with your Personal Information.

We collect and process your Contact Information for the following purposes:

- To verify your identity.
- To communicate with you about our products and services.
- To contact you about your account.
- To improve our security.
- To improve our events.
- or webinars.
- To fulfill our contractual obligations to you.
- To provide you with customer support.
- To comply with legal requirements.
- To prevent fraud and abuse.
- To improve our products and services.

Contact Information is collected • To invite you to our events Yes from you and may also be collected from other third parties.

We collect and process your Device Information for the following purposes:

- To provide you with our products and services.
- To protect our systems and networks.
- To protect our users.
- To comply with legal requirements.

Device Information is collected from you, other third parties or subscribers.

Yes We may also collect your Device Information automatically through our use of cookies and other data collection technologies on our sites.

• Geolocation data • Audio, electronic, visual, thermal,

• Internet or other

electronic network

activity information

olfactory, or similar information

• Inferences

Device Information

Identifiers

(Cal. Civ. Code §

1798.80(e))

Information		TATe collect and muccess warm		
(Cal. Civ. Code § 1798.80(e)) • Customer records	Name of emergency contact, contact information of emergency contact, relationship to individual, next of kin	We collect and process your Emergency Contact Information to contact your emergency contact in an emergency.		Emergency Contact Information is collected from you or your representatives you have authorized to provide us with your Personal Information.
information • Identifiers				mormation.
Family Information		We collect and process your Family Information for the		
(Cal. Civ. Code § 1798.80(e))	Parent's name, dependents, and other household	following purposes:	No	Family Information is collected from you or your representatives you have
Customer records informationIdentifiers	information	 To contact your family members in the event of an emergency. 	NO	authorized to provide us with your Personal Information.
Financial Detail Information (Cal. Civ. Code § 1798.80(e))	Bank account information, bank statements,	We collect and process your Financial Detail Information for the following purposes: • To process payments. • To verify your identity. • To protect our interests.		Financial Detail Information is collected from prospective corporate
 Identifiers Customer records information Commercial information 	compensation data, and other financial-related details such as income, investments, benefits, tax status	 To provide you with the financial products and services that you have requested. To comply with legal requirements. To protect against fraud and abuse. 	No	acquisitions you or your
Government Identifier Information (Cal. Civ. Code §		We collect and process your Government Identifier Information for the following		
 Identifiers Customer records information Characteristics of protected classifications under California or federal law 	Driver's license, national identification number, passport number, social security number, national identity card details	 purposes: To verify your identity. To comply with legal requirements. To prevent fraud and abuse. 	No	Government Identifier Information is collected from you or your representatives you have authorized to provide us with your Personal Information.
Personal Detail Information		We collect and process your Personal Detail Information for the following purposes:		
 (Cal. Civ. Code § 1798.80(e)) Identifiers Customer records information Characteristics of protected classifications under California or federal law 	Age, gender, date of birth, marital status, nationality, signature	 To provide information that you have requested. To provide event registration. To improve our products and services. To improve our events. To comply with legal requirements. To prevent fraud and abuse. 	No	Personal Detail Information is collected from you and third parties you have authorized to provide us with your Personal Information.

Emergency Contact Information

Personal Health Information				
 (Cal. Civ. Code § 1798.80(e)) Identifiers Customer records information Characteristics of protected classifications under California or federal law 	Information related to medical payment, medical claims data, medical history, products, or equipment used, health plan beneficiary, medical treatment	We collect and process your Personal Health Information for the following purposes: • To assist in meal planning.	No	Personal Health Information is collected from you or your representatives you have authorized to provide us with your Personal Information.
Professional Experience and Affiliation Information (Cal. Civ. Code § 1798.80(e)) • Customer records information • Education information • Professional or employment-related information • Inferences	Professional memberships, qualifications, certifications	We collect and process your Professional Experience and Affiliation Information for the following purposes: • To evaluate your qualifications for employment. • To comply with legal requirements. • To prevent fraud and abuse.	No	Professional Experience and Affiliation Information is collected from you, your representatives, and third parties you have authorized to provide us with your Personal Information.
Referral Information (Cal. Civ. Code § 1798.80(e)) • Professional or employment-related information • Inferences	Name of referral, contact information of referral, relationship of referral	We collect and process your Referral Information for the following purposes: • To evaluate your qualifications for employment. • To contact you about employment opportunities. • To improve our hiring process. • To comply with legal requirements. • To prevent fraud and abuse.	No	Referral Information is collected from you, and third parties you have authorized to provide us with your Personal Information. We may also collect your Referral Information from references you list on applications and forms.
Sensitive Personal Information (Cal. Civ. Code § 1798.80(e)) • Identifiers • Customer records information • Characteristics of protected classifications under California or federal law • Biometric information • Geolocation data • Audio, electronic, visual, thermal, olfactory, or similar information	Driver's license number, social security number, passport numbers, credit and debit card numbers, log-in information for financial accounts, data on a consumer's religion, ethnicity, or race, geolocation data, biometric data, data about a consumer's sexual orientation or health, a consumer's mail, email, or texts	 We collect and process your Sensitive Personal Information for the following purposes: To comply with legal requirements such as antidiscrimination laws. To protect the safety of employees or others. To conduct research on the effectiveness of training programs or the impact of diversity in the workplace. To prevent fraud and abuse. With your consent, to market our products and services to you. 	No	Sensitive Personal Information is collected from you or your representatives you have authorized to provide us with your Personal Information.
Travel and Expense Information (Cal. Civ. Code § 1798.80(e)) • Identifiers • Customer records information • Commercial information • Geolocation data	Expense details, travel booking details, travel history	We collect and process your Travel and Expense Information for the following purposes: • To reimburse your travel expenses. • To track your travel expenses. • To ensure you are complying with company travel policies. • To improve our travel and	No	Travel and Expense Information is collected from you.

expense management processes. Inferences

 To comply with legal requirements.

Workplace Welfare Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Customer records information
- Characteristics of protected classifications under California or federal law
- Internet or other electronic network activity information
- Geolocation data
- Audio, electronic, visual, thermal, olfactory, or similar information
- Professional or employment-related information
- Education information
- Inferences

Contact Information

Identifiers

(Cal. Civ. Code § 1798.80(e))

• Internet or other

Geolocation data

electronic network

activity information

We collect and process your **Workplace Welfare Information** for the following purposes:

- To improve our workplace welfare programs.
- To comply with legal requirements.
- To prevent fraud and abuse.

Workplace Welfare Information is No collected from you and our employees.

Data Category (Corporate)

Example Personal Identifiers

Bullying and harassment details

Purposes for Collection/ Use

Shared with Third Parties

Sources of Personal Information

We collect and process your Contact Information for the following purposes:

- To register you as a new
- client. • To market our products and services.
- To send you marketing materials.
- To verify your identity.
- To identify potential clients.
- To communicate with you about our products and services.
- To contact you about your account.
- To improve our security.
- To improve our events.
- To invite you to our events or webinars.
- To fulfill our contractual obligations to you.
- To provide you with customer support.
- To comply with legal requirements.
- To prevent fraud and abuse.
- To improve our products and services.

Contact Information is collected from you Yes and may also be collected from other third parties.

Device Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Internet or other electronic network activity information
- Geolocation data
- Audio, electronic, visual, thermal, olfactory, or

Device type and operating system, device unique identifier, IP address, audio, video, device fingerprints

Name, postal address, phone number,

mailing address, email address,

physical location

We collect and process your Device Information for the following purposes:

- To protect our systems and networks.
- To protect our users.
- To comply with legal requirements.

Device Information is collected from you, other third parties or subscribers.

Yes We may also collect your Device Information automatically through our use of cookies and other data collection technologies on our sites.

Financial Detail Information • To conduct due diligence. • To protect our interests. Bank account information, bank Financial Detail Information is collected (Cal. Civ. Code § 1798.80(e)) • To negotiate acquisitions. statements, compensation data, and from prospective corporate acquisitions, • To provide you with the Identifiers other financial-related details such as No you, or your representatives you have financial products and • Customer records authorized to provide us with your Personal income, investments, benefits, tax services that you have information Information. status requested. Commercial information To comply with legal requirements. To protect against fraud and abuse. Government Identifier We collect and process your Information Government Identifier Information for the following (Cal. Civ. Code § 1798.80(e)) purposes: Driver's license, national identification Government Identifier Information is Identifiers number, passport number, social • To verify your identity. collected from you or your representatives Customer records security number, national identity card you have authorized to provide us with your • To comply with legal information Personal Information. details requirements. • Characteristics of • To prevent fraud and protected classifications abuse. under California or federal law We collect and process your Personal Detail Information for the following purposes: Personal Detail Information • To provide information that you have requested. (Cal. Civ. Code § 1798.80(e)) To provide event registration. Identifiers Personal Detail Information is collected • To improve our products Customer records Age, gender, date of birth, marital from you and third parties you have and services. information authorized to provide us with your Personal status, nationality, signature • To improve our events. Characteristics of Information. • To comply with legal protected classifications requirements. under California or To prevent fraud and federal law abuse. To market our products and services. Personal Health Information We collect and process your Personal Health Information for (Cal. Civ. Code § 1798.80(e)) the following purposes: Information related to medical Identifiers Personal Health Information is collected payment, medical claims data, medical To assist in meal planning. • Customer records from you or your representatives you have history, products, or equipment used, To comply with regulatory No information authorized to provide us with your Personal health plan beneficiary, medical requirements. Characteristics of Information. treatment To prevent fraud and protected classifications under California or federal law **Data Category Example Personal Purposes for Collection/ Shared with Third Sources of Personal** (Employees) **Identifiers Parties** Use **Information** We collect and process your Authenticating Information for the following purposes: Authenticating • To authenticate your Information Authenticating information is identity and grant you collected from you or your access to our services or (Cal. Civ. Code § No representatives you have Passwords, PIN, mother's maiden name systems. 1798.80(e)) authorized to provide us with • To prevent fraud and your Personal Information. • Identifiers abuse. • To comply with legal requirements, such as those related to financial services or healthcare.

We collect and process your Financial Detail Information for

• To verify your identity.

the following purposes:

similar information

Inferences

		• To improve the security of our systems and services.		
Information	Name of beneficiary contact, telephone number of beneficiary contact, address of beneficiary contact, relationship to individual	We collect and process your Beneficiary Contact Information for the following purposes: • To contact your beneficiary in the event of your death. • To provide information about benefits to your beneficiary. • To comply with legal requirements, such as those related to employment law or tax law. • To protect the privacy of your beneficiary contact information.	No	Beneficiary Contact Information is collected from you or your representatives you have authorized to provide us with your Personal Information.
		We collect and process your Background Check Information for the following purposes:		
Background Check Information (Cal. Civ. Code § 1798.80(e)) • Identifiers • Customer records information • Characteristics of protected classifications under California or federal law • Professional or employment-related information • Education information	Criminal history, criminal records, driving citations	 To prevent fraud and abuse. To verify your identity and qualifications. To assess your suitability for the position. To comply with legal requirements, such as those related to employment law or antidiscrimination law. To protect the safety and security of our employees and customers. To prevent fraud and abuse. To improve our decision-making about hiring, promotion, and other employment-related decisions. 		Background Check Information is collected from you and third parties you have authorized to provide us with your Personal Information.
t nuaren iniarmanan	Names of children, age or gender of children, birth date, address of children, activities associated with children	We collect and process Clients' Children Information only with the consent of a parent or guardian for the following purposes: • To comply with our legal obligation to protect the privacy of children. • To provide employees with benefits. • To provide employees with services.	No	Children Information is collected from you or your representatives you have authorized to provide us with your Personal Information.
• 10000000	Name, postal address, phone number, mailing address, email address, physical location	We collect and process your Contact Information for the following purposes: • To verify your identity. • To communicate with you about our products and services. • To contact you about your account. • To improve our security. • To improve our events. • To invite you to our events or webinars.	Yes	Contact Information is collected from you and may also be collected from other third parties.

		 To fulfill our contractual obligations to you. To provide you with customer support. To comply with legal requirements. To prevent fraud and abuse. To improve our products and services. 	
Device Information			
 (Cal. Civ. Code § 1798.8o(e)) Identifiers Internet or other electronic network activity information Geolocation data Audio, electronic, visual, thermal, olfactory, or similar information Inferences 	Device type and operating system, device unique identifier, IP address, audio, video, device fingerprints	 We collect and process your Device Information for the following purposes: To provide you with our products and services. To protect our systems and networks. To protect our users. To comply with legal requirements. 	Device Information is collected from you, other third parties or subscribers. Yes We may also collect your Device Information automatically through our use of cookies and other data collection technologies on our sites.
Education and Skills Information (Cal. Civ. Code § 1798.80(e)) • Customer records information • Education information • Professional or employment-related information • Inferences	Academic transcripts, educational degrees, education training and history, languages, letters of recommendation	We collect and process your Education and Skills Information for the following purposes: • To assess the potential advancement of employees. • To provide training and development opportunities for employees. • To improve the company's recruitment and hiring processes.	Education and Skills Information is collected from you. We may also collect Education No and Skills Information directly from third-party recruiters you are using to find employment which you have authorized to provide us with your Personal Information.
Employment Information (Cal. Civ. Code § 1798.8o(e)) • Customer records information • Professional or employment-related information • Audio, electronic, visual, thermal, olfactory, or similar information • Characteristics of protected classifications under California or federal law • Inferences	Benefits and entitlements data, company/entity, contract type, hours of work, job title, salary/wage, workers compensation claims, start date, end date, reason for termination, employee performance results, record of absence, time tracking, annual leave, office location, previous work history, grievances and complaints, health and safety-related information and reporting, job application details, disciplinary action, exit interview	 We collect and process your Employment Information for the following purposes: To assess the potential advancement of employees. To provide training and development opportunities for employees. To manage our workforce. To comply with legal requirements. To provide you with the benefits and services to which you are entitled. 	Employment Information is collected from you or your representatives you have authorized to provide us with your Personal Information. No We may also collect Education and Skills Information directly from third-party recruiters you are using to find employment which you have authorized to provide us with your Personal Information.
Emergency Contact Information (Cal. Civ. Code § 1798.80(e)) • Customer records information • Identifiers	Name of emergency contact, contact information of emergency contact, relationship to individual, next of kin	We collect and process your Emergency Contact Information to contact your emergency contact in an emergency.	Emergency Contact Information is collected from you or your No representatives you have authorized to provide us with your Personal Information.
Family Information (Cal. Civ. Code §	Parent's name, dependents, and other household	We collect and process your Family Information for the following purposes:	Family Information is collected from you or your representatives
1798.80(e)) • Customer records	information	• To contact your family members in the event of	No you have authorized to provide us with your Personal Information.

information an emergency. Identifiers We collect and process your **Financial Detail Information** for the following purposes: Financial Detail To process payroll. Information • To verify your identity. • To conduct due Financial Detail Information is (Cal. Civ. Code § diligence. collected from prospective 1798.80(e)) • To protect our interests. Bank account information, bank statements, corporate acquisitions, you, or compensation data, and other financial-related details • To provide you with the No Identifiers your representatives you have financial products and such as income, investments, benefits, tax status • Customer records authorized to provide us with services that you have information your Personal Information. requested. Commercial To comply with legal information requirements. • To protect against fraud and abuse. Government Identifier We collect and process your Information Government Identifier Information for the following (Cal. Civ. Code § purposes: 1798.80(e)) • To verify your identity. Identifiers Driver's license, national identification number, passport • To comply with legal • Customer records No you or your representatives you number, social security number, national identity card requirements. information have authorized to provide us details To prevent fraud and Characteristics of with your Personal Information. abuse. protected • To provide governmentclassifications under mandated benefits. California or federal law We collect and process your **Personal Detail Information** for the following purposes: To provide employment. • To provide benefits. • To provide information Personal Detail that you have requested. Information • To provide event registration. (Cal. Civ. Code § • To improve our products 1798.80(e)) and services. Identifiers • To improve our Age, gender, date of birth, marital status, nationality, Customer records employment practices. signature information • To improve our benefits. Characteristics of • To provide you with Information. protected benefits.

classifications under California or federal law

Personal Health Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Customer records information
- Characteristics of protected classifications under California or federal law

Information related to medical payment, medical claims data, medical history, products, or equipment used, health plan beneficiary, medical treatment

We collect and process your Personal Health Information for the following purposes:

• To improve our events.

• To comply with legal

• To prevent fraud and

• To market employment

To market our benefits to

requirements.

opportunities.

abuse.

you.

- To assist in meal planning.
- To improve our products and services.
- To improve our benefits.
- To provide you with benefits.
- To communicate with healthcare providers.
- To comply with regulatory requirements.

Government Identifier Information is collected from

Personal Detail Information is collected from you and third No parties you have authorized to provide us with your Personal

Personal Health Information is collected from you or your No representatives you have authorized to provide us with

your Personal Information.

for the following purposes: Sensitive Personal Information To comply with legal requirements such as (Cal. Civ. Code § anti-discrimination laws. 1798.80(e)) • To protect the safety of Identifiers employees or others. Customer records • To conduct research on information the effectiveness of Driver's license number, social security number, passport Sensitive Personal Information is Characteristics of numbers, credit and debit card numbers, log-in training programs or the collected from you or your impact of diversity in the information for financial accounts, data on a consumer's protected No representatives you have classifications under religion, ethnicity, or race, geolocation data, biometric workplace. authorized to provide us with California or federal data, data about a consumer's sexual orientation or • To prevent fraud and your Personal Information. law health, a consumer's mail, email, or texts abuse. • Biometric • With your consent, to information market our products and Geolocation data services to you. • Audio, electronic, • To improve our visual, thermal, benefits. olfactory, or similar • To provide you with information benefits. To communicate with healthcare providers. We collect and process your Travel and Expense Information for the following Travel and Expense Information purposes: (Cal. Civ. Code § To reimburse your travel expenses. 1798.80(e)) To track your travel Identifiers expenses. Travel and Expense Information Expense details, travel booking details, travel history • Customer records is collected from you. • To ensure you are information complying with company Commercial travel policies. information • To improve our travel Geolocation data and expense Inferences management processes. To comply with legal requirements. We collect and process your **User Account Information for** the following purposes: To create and manage **User Account Information** User Account Information is your account. collected from you. • To provide you with (Cal. Civ. Code § access to our products 1798.80(e)) We may also collect your User Account age, account number, email address or and services. Account Information from thirdusername, account password Identifiers • To protect your account party payment processors, if Customer records from unauthorized used to process your payment for information access. services rendered. • To improve our products and services. To comply with legal requirements. We collect and process your Workplace Welfare Information Workplace Welfare Information for the following (Cal. Civ. Code § purposes: 1798.80(e)) • To provide you with the Identifiers benefits to which you are • Customer records entitled. Workplace Welfare Information information • To manage your No is collected from you and our Bullying and harassment details Characteristics of compensation and employees. protected benefits. classifications under • To improve our California or federal workplace welfare law programs. • Internet or other To comply with legal electronic network requirements. activity information To prevent fraud and

To prevent fraud and

We collect and process your Sensitive Personal Information

abuse.

 Geolocation data Audio, electronic, visual, thermal, olfactory, or similar information Professional or employment-related information Education information Inferences 		abuse.		
Data Category (Event Attendees)	Example Personal Pu Identifiers	rposes for Collection/ Shar Use	ed with Third Parties	Sources of Personal Information
		We collect and process your Contact Information for the following purposes:		
Contact Information (Cal. Civ. Code § 1798.80(e)) • Identifiers • Internet or other electronic network activity information • Geolocation data	Name, postal address, phone number, mailing address, email address, physical location	 To market our products and services. To send you marketing materials. To verify your identity. To identify potential clients. To communicate with you about our products and services. To contact you about your account. To improve our security. To improve our events. To invite you to our events or webinars. To fulfill our contractual obligations to you. To provide you with customer support. To comply with legal requirements. To prevent fraud and abuse. To improve our products and services. 	vas Contact Informatio	on is collected from you and ed from other third parties.
Device Information		We collect and process your		
 (Cal. Civ. Code § 1798.8o(e)) Identifiers Internet or other electronic network activity information Geolocation data Audio, electronic, visual, thermal, olfactory, or similar information Inferences 	Device type and operating system, device unique identifier, IP address, audio, video, device fingerprints	 Device Information for the following purposes: To provide you with our products and services. To protect our systems and networks. To protect our users. To comply with legal requirements. 	Yes We may also collect automatically through	n is collected from you, other oscribers. It your Device Information agh our use of cookies and on technologies on our sites.
Emergency Contact Information		We collect and process your		
(Cal. Civ. Code § 1798.8o(e))Customer records informationIdentifiers	Name of emergency contact, contact information of emergency contact, relationship to individual, next of kin	Emergency Contact Information to contact your emergency contact in an emergency.	Mo from you or your re	t Information is collected epresentatives you have ide us with your Personal
Family Information (Cal. Civ. Code § 1798.80(e)) • Customer records information	Parent's name, dependents, and other household information	We collect and process your Family Information for the following purposes: • To contact your family members in the event of an emergency.	No your representative	n is collected from you or es you have authorized to ur Personal Information.
• Identifiers				

• Geolocation data

 Identifiers Customer records information Characteristics of protected classifications under California or federal law 	Driver's license, national identification number, passport number, social security number, national identity card details	 To verify your identity. To comply with legal requirements. To prevent fraud and abuse. 	No	Government Identifier Information is collected from you or your representatives you have authorized to provide us with your Personal Information.
Personal Detail Information (Cal. Civ. Code § 1798.8o(e)) • Identifiers • Customer records information • Characteristics of protected classifications under California or federal law	Age, gender, date of birth, marital status, nationality, signature, image/video, voice/audio recording	 We collect and process your Personal Detail Information for the following purposes: To provide products and services that you have requested. To provide information that you have requested. To provide event registration. To improve our products and services. To improve our events. To comply with legal requirements. To prevent fraud and abuse. To market our products and services. To provide products and services to you. Event management 	Yes	Personal Detail Information is collected from you and third parties you have authorized to provide us with your Personal Information.
Personal Health Information				
(Cal. Civ. Code § 1798.80(e))		We collect and process your		
 Identifiers Customer records information Characteristics of protected classifications under California or federal law 	Information related to medical payment, medical claims data, medical history, products, or equipment used, health plan beneficiary, medical treatment	Personal Health Information for the following purposes: • To assist in meal planning.	No	Personal Health Information is collected from you or your representatives you have authorized to provide us with your Personal Information.
Professional Experience and Affiliation Information		We collect and process very		
(Cal. Civ. Code § 1798.80(e))		We collect and process your Professional Experience and Affiliation Information for the		Professional Experience and Affiliation
 Customer records information Education information Professional or employment-related information Inferences 	Professional memberships, qualifications, certifications	following purposes: • To improve our products and services.	No	Information is collected from you, your representatives, and third parties you have authorized to provide us with your Personal Information.
Social Media Information				
(Cal. Civ. Code § 1798.80(e))				
 Identifiers Customer records information Commercial information Internet or other electronic network activity information Geolocation data Audio, electronic, visual, thermal, olfactory, or similar information Professional or employment-related 	Social media accounts, social media content, social media history, profile information, posts, connections, likes, shares, comments, interactions, behavioral data, technical data	 We collect and process your Social Media Information for the following purposes: To market our products and services to you. To improve our products and services. To comply with legal requirements 		Social Media Information is collected from you, your clients, or your representatives you have authorized to provide us with your Personal Information. We may also collect your Social Media Information from third-party sources, such as social media platforms (if you interact with us through your social media account), cookies and other data collection technologies on our sites.

We collect and process your

Information for the following

Government Identifier

purposes:

Government Identifier

• Identifiers

(Cal. Civ. Code § 1798.80(e))

Driver's license, national

Information

Purposes for Collection/ Data Category (Job Example Personal Shared with Third Sources of Personal Applicants) **Identifiers** Use **Parties Information** We collect and process your **Background Check** Information for the following purposes: To understand your needs and interests. **Background Check** To prevent fraud and Information abuse. To verify your identity (Cal. Civ. Code § and qualifications. 1798.80(e)) · To assess your Identifiers suitability for the Customer records position. **Background Check Information is** information To comply with legal collected from you and third Characteristics of requirements, such as Criminal history, criminal records, driving citations No parties you have authorized to protected those related to provide us with your Personal classifications under employment law or Information. California or federal anti-discrimination law. Professional or • To protect the safety employment-related and security of our information employees and Education customers. information To prevent fraud and abuse. • To improve our decision-making about hiring, promotion, and other employmentrelated decisions. We collect and process your Contact Information for the following purposes: • To verify your identity. To communicate with vou about our products Contact Information and services. To improve our (Cal. Civ. Code § security. 1798.80(e)) • To improve our events. Contact Information is collected Yes from you and may also be Name, postal address, phone number, mailing address, • To invite you to our Identifiers collected from other third email address, physical location events or webinars. • Internet or other • To fulfill our contractual parties. electronic network obligations to you. activity information • To provide you with Geolocation data customer support.

(Cal. Civ. Code §

- Identifiers
- activity information identifier, IP address, audio, video, device fingerprints
- Audio, electronic, visual, thermal, olfactory, or similar information

We collect and process your Device Information for the

• To comply with legal requirements.

To prevent fraud and

products and services.

• To improve our

abuse.

- To protect our systems and networks.
- To protect our users.
- To comply with legal

Yes We may also collect your Device Information automatically through our use of cookies and other data collection technologies on our sites.

following purposes:

- To provide you with our products and services.
- requirements.

Device Information

1798.80(e))

 Internet or other electronic network

Device type and operating system, device unique

Geolocation data

Inferences

Device Information is collected from you, other third parties or subscribers.

Education and Skills We collect and process your Information **Education and Skills** Information for the following **Education and Skills Information** (Cal. Civ. Code § is collected from you. purposes: 1798.80(e)) We may also collect Education • To verify the Customer records Academic transcripts, educational degrees, education and Skills Information directly educational information training and history, languages, letters of from third-party recruiters you qualifications of job Education recommendation are using to find employment applicants. information which you have authorized to • To improve the Professional or provide us with your Personal company's recruitment employment-related Information. and hiring processes. information Inferences **Employment Information** We collect and process your (Cal. Civ. Code § **Employment Information for** 1798.80(e)) the following purposes: **Employment Information is** Customer records • To verify the collected from you or your information educational representatives you have Benefits and entitlements data, company/entity, contract • Professional or qualifications of job authorized to provide us with type, hours of work, job title, salary/wage, workers employment-related applicants. your Personal Information. compensation claims, start date, end date, reason for information • To provide training and termination, employee performance results, record of • Audio, electronic, No We may also collect Education development absence, time tracking, annual leave, office location, and Skills Information directly visual, thermal, opportunities for previous work history, grievances and complaints, health from third-party recruiters you olfactory, or similar employees. and safety-related information and reporting, job are using to find employment information • To improve the application details, disciplinary action, exit interview which you have authorized to Characteristics of company's recruitment provide us with your Personal protected and hiring processes. classifications under Information. • To comply with legal California or federal requirements. law Inferences **Emergency Contact** Information We collect and process your **Emergency Contact Information Emergency Contact** (Cal. Civ. Code § is collected from you or your Information to contact your Name of emergency contact, contact information of 1798.80(e)) No representatives you have emergency contact in an emergency contact, relationship to individual, next of kin authorized to provide us with emergency. Customer records your Personal Information. information Identifiers Government Identifier Information We collect and process your Government Identifier (Cal. Civ. Code § Information for the following 1798.80(e)) purposes: Government Identifier Identifiers Information is collected from you Driver's license, national identification number, passport • To verify your identity. Customer records No or your representatives you have number, social security number, national identity card • To comply with legal authorized to provide us with information details requirements. • Characteristics of your Personal Information. • To prevent fraud and protected abuse. classifications under California or federal law We collect and process your **Personal Detail Information** for the following purposes: Personal Detail • To provide Information employment. • To provide information (Cal. Civ. Code § that you have 1798.80(e)) requested. • To provide event Personal Detail Information is • Identifiers Age, gender, date of birth, marital status, nationality, Yes collected from you and third registration. Customer records signature, image/video • To improve our parties you have authorized to information provide us with your Personal products and services. Characteristics of Information. • To improve our events. protected • To comply with legal classifications under requirements. California or federal • To prevent fraud and law abuse. • To market employment opportunities. • To market our benefits to you.

Personal Health Information (Cal. Civ. Code § 1798.80(e)) Identifiers Customer records information Characteristics of protected classifications under

Information related to medical payment, medical claims data, medical history, products, or equipment used, health plan beneficiary, medical treatment

and provide them with employment, training, compensation, or benefits.

Manage our workforce

Employee hiring

We collect and process your **Personal Health Information** for the following purposes:

> To assist in meal planning.

Personal Health Information is collected from you or your No representatives you have authorized to provide us with your Personal Information.

Professional Experience and Affiliation Information

California or federal

(Cal. Civ. Code § 1798.80(e))

law

- Customer records information
- Education information
- Professional or employment-related information
- Inferences

Professional memberships, qualifications, certifications

We collect and process your Professional Experience and Affiliation Information for the following purposes:

- To evaluate your qualifications for employment.
- To improve our products and services.
- To comply with legal requirements.
- To prevent fraud and abuse.

Professional Experience and Affiliation Information is collected from you, your representatives, and third parties you have authorized to provide us with your Personal Information.

Referral Information

(Cal. Civ. Code § 1798.80(e))

- Professional or employment-related information
- Inferences

Name of referral, contact information of referral, relationship of referral

Referral Information for the following purposes:

We collect and process your

- To evaluate your qualifications for employment.
- To contact you about employment opportunities.

No

- To improve our hiring process.
- To comply with legal requirements.
- To prevent fraud and abuse.

We collect and process your

Information for the following

Sensitive Personal

purposes:

Referral Information is collected from you, and third parties you have authorized to provide us with your Personal Information.

We may also collect your Referral Information from references you list on applications and forms.

Sensitive Personal Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Customer records information
- Characteristics of protected law
- Biometric information
- Geolocation data
- Audio, electronic, visual, thermal, olfactory, or similar information

Driver's license number, social security number, passport numbers, credit and debit card numbers, log-in information for financial accounts, data on a consumer's classifications under religion, ethnicity, or race, geolocation data, biometric California or federal data, data about a consumer's sexual orientation or health, a consumer's mail, email, or texts

 To improve our products and services.

- To comply with legal requirements such as anti-discrimination laws.
- To protect the safety of employees or others.
- To conduct research on the effectiveness of training programs or the impact of diversity in the workplace.
- To prevent fraud and abuse.
- With your consent, to market our products and services to you.

Sensitive Personal Information is collected from you or your No representatives you have authorized to provide us with your Personal Information.

Data Category (Office Visitors)

Example Personal Identifiers

Purposes for Collection/ Use

Shared with Third Parties

Sources of Personal Information

		We collect and process your Contact Information for the following purposes:		
Contact Information (Cal. Civ. Code § 1798.80(e)) • Identifiers • Internet or other electronic network activity information • Geolocation data	Name, postal address, phone number, mailing address, email address, physical location	 To market our products and services. To send you marketing materials. To verify your identity. To identify potential clients. To communicate with you about our products and services. To contact you about your office visit. To improve our security. To improve our events. To invite you to our events or webinars. To fulfill our contractual obligations to you. To provide you with customer support. To comply with legal requirements. To prevent fraud and abuse. To improve our products and services. 	Yes	Contact Information is collected from you and may also be collected from other third parties.
Device Information		We collect and process your Device		
(Cal. Civ. Code § 1798.80(e))		Information for the following purposes:		Device Information is collected from
 Identifiers Internet or other electronic network activity information Geolocation data Audio, electronic, visual, thermal, olfactory, or similar information Inferences 	Device type and operating system, device unique identifier, IP address, audio, video, device fingerprints	 To provide you with our products and services. To protect our systems and networks. To protect our users. To comply with legal requirements. 	Yes	you, other third parties or subscribers. We may also collect your Device Information automatically through our use of cookies and other data collection technologies on our sites.
Emergency Contact Information				
(Cal. Civ. Code § 1798.80(e))	Name of emergency contact, contact	We collect and process your Emergency Contact Information to		Emergency Contact Information is collected from you or your
Customer records informationIdentifiers	information of emergency contact, relationship to individual, next of kin	contact your emergency contact in an emergency.	No	representatives you have authorized to provide us with your Personal Information.
Government Identifier Information (Cal. Civ. Code § 1798.80(e)) • Identifiers • Customer records information • Characteristics of protected classifications under California or federal law	Driver's license, national identification number, passport number, social security number, national identity card details	We collect and process your Government Identifier Information for the following purposes: • To verify your identity. • To comply with legal requirements. • To prevent fraud and abuse.	No	Government Identifier Information is collected from you or your representatives you have authorized to provide us with your Personal Information.
Personal Detail Information (Cal. Civ. Code § 1798.80(e)) • Identifiers • Customer records	Age, gender, date of birth, marital	 We collect and process your Personal Detail Information for the following purposes: To provide products and services that you have requested. To provide information that 	N	Personal Detail Information is collected from you and third parties you have
 information Characteristics of protected classifications under California or federal law 	status, nationality, signature	 you have requested. To provide event registration. To improve our products and services. To improve our events. To comply with legal requirements. To prevent fraud and abuse. 	No	authorized to provide us with your Personal Information.

Personal Health Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Customer records information
- Characteristics of protected classifications under California or federal law

Information related to medical payment, medical claims data, medical history, products, or equipment used, health plan beneficiary, medical treatment

We collect and process your Personal Health Information for the following purposes:

• To provide you with our products and services.

Purposes for Collection/

Use

We collect and process your

for the following purposes:

and interests.

Background Check Information

To understand your needs

To assess your suitability for

requirements, such as those

laundering or know-your-

To prevent fraud and abuse.

making about marketing and

• To improve our decision-

our products or services.

To comply with legal

customer laws.

sales.

related to anti-money

• To assist in meal planning.

Parties

Personal Health Information is collected from you or your No representatives you have authorized to provide us with your Personal Information.

Data Category (Prospective Clients)

Example Personal Identifiers Background Check

(Cal. Civ. Code § 1798.80(e))

Identifiers

Information

- Customer records information
- Characteristics of protected classifications under California or federal law
- Professional or employment-related information
- Education information

Contact Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Internet or other electronic network

Criminal history, criminal records, driving citations

Name, postal address, phone

number, mailing address, email

We collect and process your Contact Information for the following purposes:

- To register you as a new client.
- To market our products and services.
- To send you marketing materials.
- To verify your identity.
- To identify potential clients.
- To communicate with you about our products and services.
- To improve our security.
- To improve our events.
- To invite you to our events or webinars.
- To fulfill our contractual obligations to you.
- To provide you with customer support.
- To process payments.
- To comply with legal requirements.
- To prevent fraud and abuse.
- To improve our products and services.

Shared with Third Sources of Personal

Information

Background Check Information is collected No from you and third parties you have authorized to provide us with your Personal Information.

Yes Contact Information is collected from you and may also be collected from other third parties.

Contact Information is collected from you from publicly accessible sources, such as professional networking sites (e.g., LinkedIn), forums, and other publicly available forums, where you have chosen to make your information visible.

address, physical location activity information

Geolocation data

Device type and operating system, device unique identifier, IP address,

audio, video, device fingerprints

We collect and process your Device Information for the following purposes:

- To provide you with our products and services.
- To protect our systems and networks.
- To protect our users.
- To comply with legal requirements.

Device Information is collected from you, other third parties or subscribers.

Yes We may also collect your Device Information automatically through our use of cookies and other data collection technologies on our sites.

• Geolocation data • Audio, electronic,

Internet or other

electronic network

activity information

(Cal. Civ. Code § 1798.80(e))

visual, thermal, olfactory, or similar information

Inferences

Device Information

Identifiers

Emergency Contact Information		We collect and process your		
(Cal. Civ. Code § 1798.80(e))	Name of emergency contact, contact	We collect and process your Emergency Contact Information to contact your emergency contact in		Emergency Contact Information is collected from you or your representatives you have
Customer records informationIdentifiers	information of emergency contact, relationship to individual, next of kin	an emergency.	No	authorized to provide us with your Personal Information.
Government Identifier Information		We collect and process your		
(Cal. Civ. Code § 1798.80(e))		Government Identifier Information for the following		
 Identifiers Customer records information Characteristics of protected classifications under California or federal law 	Driver's license, national identification number, passport number, social security number, national identity card details	purposes:	No	Government Identifier Information is collected from you or your representatives you have authorized to provide us with your Personal Information.
		We collect and process your Personal Detail Information for the following purposes:		
Personal Detail Information (Cal. Civ. Code § 1798.80(e)) • Identifiers • Customer records information • Characteristics of protected classifications under California or federal law	Age, gender, date of birth, marital status, nationality, signature	 To provide products and services that you have requested. To provide information that you have requested. To provide event registration. To improve our products and services. To improve our events. To comply with legal requirements. To prevent fraud and abuse. To market our products and services. 		Personal Detail Information is collected from you and third parties you have authorized to provide us with your Personal Information. Personal Detail Information is collected from you from publicly accessible sources, such as professional networking sites (e.g., LinkedIn), forums, and other publicly available forums, where you have chosen to make your information visible.
Personal Health Information				
 (Cal. Civ. Code § 1798.80(e)) Identifiers Customer records information Characteristics of protected classifications under California or federal law 	Information related to medical payment, medical claims data, medical history, products, or equipment used, health plan beneficiary, medical treatment	We collect and process your Personal Health Information for the following purposes: • To assist in meal planning.	No	Personal Health Information is collected from you or your representatives you have authorized to provide us with your Personal Information.
Professional Experience and Affiliation Information		We collect and process your Professional Experience and Affiliation Information for the		
 (Cal. Civ. Code § 1798.8o(e)) Customer records information Education information Professional or employment-related information Inferences 	Professional memberships, qualifications, certifications	 following purposes: To improve our products and services. To comply with legal requirements. To market our products and services to you. To prevent fraud and abuse. 		Professional Experience and Affiliation Information is collected from you, your representatives, and third parties you have authorized to provide us with your Personal Information.
Social Media Information		We collect and process your Social Media Information for the		Social Media Information is collected from
(Cal. Civ. Code § 1798.80(e))	Social media accounts, social media	following purposes:		you, your clients, or your representatives you have authorized to provide us with your
 Identifiers Customer records information Commercial information Internet or other electronic network 	content, social media history, profile information, posts, connections, likes, shares, comments, interactions, behavioral data, technical data	 To market our products and services to you. To improve our products and services. To comply with legal requirements. 	No	Personal Information. We may also collect your Social Media Information from third-party sources, such as social media platforms (if you interact with us through your social media account), cookies and other data collection technologies on our

Example Personal P Identifiers	urposes for Collection/ Shar Use			Sources of Personal Information
	We collect and process your Contact Information for the following purposes:			
Name, postal address, phone number, mailing address, email address, physical location	services. To send you marketing materials. To verify your identity. To identify potential clients To communicate with you about our products and services. To contact you about your account. To improve our security. To improve our events. To invite you to our events or webinars. To fulfill our contractual obligations to you. To provide you with customer support. To comply with legal requirements.	Yes Co	ontact Inform ay also be co	nation is collected from you and llected from other third parties.
Device type and operating system, device unique identifier, IP address audio, video, device fingerprints	To protect our systems and networks.To protect our users.To comply with legal requirements.	thi Yes We au oth	ird parties or e may also co tomatically t	ation is collected from you, other r subscribers. ollect your Device Information through our use of cookies and ection technologies on our sites.
Name of emergency contact, contact information of emergency contact, relationship to individual, next of kin	Emergency Contact Information	et No fro	om you or yo thorized to p	ntact Information is collected our representatives you have provide us with your Personal
	Name, postal address, phone number, mailing address, email address, physical location Device type and operating system, device unique identifier, IP address audio, video, device fingerprints Name of emergency contact, contact information of emergency contact, relationship to individual, next of	We collect and process your Contact Information for the following purposes: • To market our products and services. • To send you marketing materials. • To verify your identity. • To identify potential clients • To communicate with you about our products and services. • To contact you about your account. • To improve our security. • To improve our events. • To improve our events. • To fulfill our contractual obligations to you. • To provide you with customer support. • To comply with legal requirements. • To improve our products and services. • To protect our users and services that you have requested. • To protect our users. • To protect our users. • To protect our users. • To market our products and services that you have requirements. • To market our products and services to you.	Name of emergency contact, contact information of emergency contact, relationship to individual, next of	We collect and process your Contact Information for the following purposes: • To market our products and services. • To send you marketing materials. • To overify your identity. • To identify potential clients. • To communicate with you about our products and services. • To contact you about your account. • To improve our security. • To improve our security. • To improve our events. • To improve our events or webinars. • To fulfill our contractual obligations to you. • To provide you with customer support. • To comply with legal requirements. • To provide you with our products and services. • To provide you with our products and services. • To provide you with our products and services. • To improve our products and services. • To improve our products and services. • To improve our products and services. • To provide you with our products and services. • To protect our users. • To protect our systems and networks. • To protect our systems and networks. • To protect our systems and networks. • To protect our support. • To protect our systems and networks. • To market our products and services of the following purposes: • To omake tour products and services. • To market our products and services of the following purposes: • To omake tour systems and networks. • To protect our systems and networks. • To market our products and services of the following purposes: • To omake tour services. • To market our products and services of the following purposes: • To omake tour services of the following purposes: • To omake

sites.

activity information
• Geolocation data

 Audio, electronic, visual, thermal, olfactory, or similar information

Personal Detail Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Customer records information
- Characteristics of protected classifications under California or federal law

Age, gender, date of birth, marital status, nationality, signature

• To provide products and services that you have

We collect and process your Personal Detail Information for

the following purposes:

- requested.
- To provide information that you have requested.
- To improve our products and services.
- To improve our events.
- To comply with legal requirements.
- To prevent fraud and abuse.
- To market our products and services.

Personal Detail Information is collected from No you and third parties you have authorized to provide us with your Personal Information.

Social Media Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Customer records information
- Commercial information
- Internet or other electronic network activity information
- Geolocation data
- Audio, electronic, visual, thermal, olfactory, or similar information
- Professional or employment-related information
- Inferences

We collect and process your Social Media Information for the following purposes:

- To understand your interests and preferences.
- To personalize your experience.
- To market our products and services to you.
- To improve our products and services.
- To comply with legal requirements.

Social Media Information is collected from you, your clients, or your representatives you have authorized to provide us with your Personal Information.

We may also collect your Social Media Information from third-party sources, such as social media platforms (if you interact with us through your social media account), cookies and other data collection technologies on our sites.

Data Category (Third Parties)

Example Personal Identifiers

Social media accounts, social media

content, social media history, profile

information, posts, connections,

interactions, behavioral data,

likes, shares, comments,

technical data

Purposes for Collection/ Use

Shared with Third Parties

Sources of Personal Information

Contact Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Internet or other electronic network activity information
- Geolocation data

Name, postal address, phone number, mailing address, email address, physical location

To verify your identity.

We collect and process your Contact Information for the

following purposes:

- To communicate with you about our products and services.
- To improve our security.
- To improve our events.
- or webinars.
- To fulfill our contractual obligations to you.
- To comply with legal requirements.
- To prevent fraud and abuse.
- To improve our products and services.

Contact Information is collected • To invite you to our events Yes from you and may also be collected from other third parties.

Device Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Internet or other electronic network activity information
- Geolocation data
- Audio, electronic, visual, thermal, olfactory, or similar information
- Inferences

Device type and operating system, device unique identifier, IP address, audio, video, device fingerprints

We collect and process your Device Information for the following purposes:

- To provide you with our products and services.
- To protect our systems and networks.
- To protect our users.
- To comply with legal requirements.

Device Information is collected from you, other third parties or subscribers.

Yes We may also collect your Device Information automatically through our use of cookies and other data collection technologies on our sites.

Emergency Contact Information		We collect and process your			
(Cal. Civ. Code § 1798.80(e))	Name of emergency contact, contact information of emergency contact, relationship to individual, next of kin	We collect and process your Emergency Contact Information to contact your emergency contact in an emergency.		Emergency Contact Information is collected from you or your representatives you have authorized to provide us with your Personal Information.	
Customer records informationIdentifiers	OI KIII				
Financial Detail Information		We collect and process your Financial Detail Information for the following purposes:			
(Cal. Civ. Code § 1798.80(e))	Bank account information, bank statements, compensation data, and other financial-related	 To process payments. To verify your identity. To conduct due diligence. To protect our interests. To negotiate acquisitions. To comply with legal requirements. To protect against fraud and abuse. 		Financial Detail Information is collected from prospective corporate acquisitions, you, or your representatives you have authorized to provide us with your Personal Information.	
 Identifiers Customer records information Commercial information	details such as income, investments, benefits, tax status				
Government Identifier Information		We collect and process your			
(Cal. Civ. Code § 1798.80(e))		Government Identifier Information for the following purposes:		Government Identifier Information	
 Identifiers Customer records information Characteristics of protected classifications under California or federal law 	Driver's license, national identification number, passport number, social security number, national identity card details	 To verify your identity. To comply with legal requirements. To prevent fraud and abuse. 	No	is collected from you or your representatives you have authorized to provide us with your Personal Information.	
Personal Detail Information		We collect and process your Personal Detail Information for the following purposes:			
(Cal. Civ. Code § 1798.80(e))		To provide information that you have requested.To provide event			
 Identifiers Customer records information Characteristics of protected classifications under California or federal law 	Age, gender, date of birth, marital status, nationality, signature	 registration. To improve our products and services. To improve our events. To comply with legal requirements. To prevent fraud and abuse. 		Personal Detail Information is collected from you and third parties you have authorized to provide us with your Personal Information.	
Personal Health Information					
(Cal. Civ. Code § 1798.80(e))		We collect and process your Personal Health Information for		Personal Health Information is	
 Identifiers Customer records information Characteristics of protected classifications under California or federal law 	Information related to medical payment, medical claims data, medical history, products, or equipment used, health plan beneficiary, medical treatment	the following purposes:To assist in meal planning.	No	collected from you or your representatives you have authorized to provide us with your Personal Information.	
Referral Information		We collect and process your Referral Information for the following purposes: • To evaluate your qualifications for		Referral Information is collected from you, and third parties you have authorized to provide us with your Personal Information.	
(Cal. Civ. Code § 1798.80(e))	Name of referral, contact information of referral,				
Professional or employment-related informationInferences	 Professional or relationship of referral employment-related information 		No	We may also collect your Referral Information from references you list on applications and forms.	

- To improve our hiring process.
- To comply with legal requirements.
- To prevent fraud and abuse.

Sensitive Personal Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Customer records information
- Characteristics of protected classifications under California or federal law
- Biometric information
- Geolocation data
- Audio, electronic, visual, thermal, olfactory, or similar information

Driver's license number, social security number, passport numbers, credit and debit card numbers, log-in information for financial accounts, data on a consumer's religion, ethnicity, or race, geolocation data, biometric data, data about a consumer's sexual orientation or health, a consumer's mail, email, or texts

We collect and process your Sensitive Personal Information for the following purposes:

- To comply with legal requirements such as antidiscrimination laws.
- To protect the safety of employees or others.
- To conduct research on the effectiveness of training programs or the impact of diversity in the workplace.

Sensitive Personal Information is collected from you or your No representatives you have authorized to provide us with your Personal Information.

Workplace Welfare Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Customer records information
- Characteristics of protected classifications under California or federal law
- Internet or other electronic network activity information
- Geolocation data
- Audio, electronic, visual, thermal, olfactory, or similar information
- Professional or employment-related information
- Education information
- Inferences

We collect and process your Workplace Welfare Information for the following purposes:

- To improve our workplace welfare programs.
- To comply with legal requirements.
- To prevent fraud and abuse.

Workplace Welfare Information is No collected from you and our employees.

Bullying and harassment details

Data Category (Website Users)

Example Personal Identifiers

Purposes for Collection/ Use

Shared with Third Parties

Sources of Personal Information

Browsing Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Internet or other electronic network activity information
- Geolocation data
- Inferences

Browsing time, cookie information, IP address, web beacons, device fingerprinting, imprecise geolocation information, web browsing history, search history, clickstream data, social media activity, ad tracking data, pixels, device unique identifier, browser type and settings, application usage data

 To understand your interests and needs.

We collect and process your **Browsing Information for** the following purposes:

- To improve the performance of our marketing campaigns.
- To improve the performance of our website.
- To personalize the content and advertising that we show to users.
- To prevent fraud and abuse.
- To comply with legal

We use third parties to collect Browsing Information on our behalf, to improve the performance of our website and to personalize the content and advertising Yes that we show to you.

We may also collect your Browsing Information automatically through our use of cookies and other data collection technologies on our sites.

Contact Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Internet or other electronic network activity information
- Geolocation data

Name, postal address, phone number, mailing address, email address, physical location

Device Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Internet or other electronic network activity information
- Geolocation data
- Audio, electronic, visual, thermal, olfactory, or similar information
- Inferences

Device type and operating system, device unique identifier, IP address, audio, video, device fingerprints

Driver's license number, social security number, passport numbers, credit and debit card numbers, log-in information for financial accounts, data on a consumer's religion, ethnicity, or race, geolocation data, biometric data, data about a consumer's sexual orientation or health, a consumer's mail, email, or texts

To market our

following purposes:

We collect and process your Contact Information for the

requirements. • To improve the

products and services.

security of our website, systems, and services.

- To send you marketing materials.
- To verify your identity.
- To identify potential clients.
- To communicate with you about our products and services.
- To contact you about your account.
 - security.

• To improve our

- To improve our events.
- To invite you to our events or webinars.
- To provide you with customer support.
- To comply with legal requirements.
- To prevent fraud and abuse.
- To improve our products and services.

We collect and process your Device Information for the following purposes:

- To provide you with our products and services.
- To improve our products and services that you have requested.
- To protect our systems and networks.
- To protect our users.
- To comply with legal requirements.
- To market our products and services to you.

Contact Information is collected from

Yes you and may also be collected from other

third parties.

Device Information is collected from you, other third parties or subscribers.

Yes We may also collect your Device Information automatically through our use of cookies and other data collection technologies on our sites.

Sensitive Personal Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Customer records information
- Characteristics of protected classifications under California or federal law
- Biometric information
- Geolocation data
- Audio, electronic, visual, thermal, olfactory, or similar information

We collect and process your Sensitive Personal Information for the following purposes:

- To provide you with the products and services you have requested.
- To improve our
- To comply with legal requirements such as anti-discrimination
- To prevent fraud and abuse.
- With your consent, to market our products and services to you.

Sensitive Personal Information is collected from you or your products and services. No representatives you have authorized to provide us with your Personal Information.

Social Media Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Customer records information
- Commercial information
- Internet or other electronic network activity information
- Geolocation data
- Audio, electronic, visual, thermal, olfactory, or similar information
- Professional or employment-related information
- Inferences

Social media accounts, social media content, social media history, profile information, posts, connections, likes, shares, comments, interactions, behavioral data, technical data

We collect and process your Social Media Information for the following purposes:

- To understand your interests and preferences.
- To personalize your experience.
- To market our products and services to you.
- To improve our products and services.
- To comply with legal requirements.

Social Media Information is collected from you, your clients, or your representatives you have authorized to provide us with your Personal Information.

Yes We may also collect your Social Media Information from third-party sources, such as social media platforms (if you interact with us through your social media account), cookies and other data collection technologies on our sites.

Browsing and Device Information

Like many companies, your visit to our website triggers automatic collection of cookies and other tracking technologies. We and third parties, including our third-party service providers may automatically collect certain details about your device and browsing, like IP address, browser type, and page views through the use of cookies and other tracking tools like analytics and pixels. This information may be used to understand your interests and needs, improve the performance of our <u>website</u>, personalize the content and advertising that we show to you, prevent fraud and abuse, comply with legal requirements, or improve the security of our website, systems, and services. If you no longer wish to receive promotional communications from us, you may at any time request that we discontinue sending you such materials by contacting us using this <u>link</u>.

Please visit our <u>Cookies and Other Tracking Technologies Notice</u> for more information.

Children's Data

Our services are not directed at Children, and we do not knowingly collect any Personal Information from Children under the age of 16 without prior verifiable parental consent.

Certain Citrin Cooperman services, may process Personal Information related to Children, such as their date of birth, address, or other identifiable information to fulfill our service obligations to you. This Personal Information is not collected directly from Children, but from other parties such as your representative, or directly from you as the parent or guardian of the Child (e.g., so that the Child may be named a beneficiary to an insurance policy or pension plan).

If Citrin Cooperman learns that a Child under the age of 16 has submitted Personal Information without parental consent, we will take all reasonable measures to delete the data as soon as possible and to not use such data for any purpose, except where necessary to protect the safety of the Child or others as required or allowed by law. If you believe a Child under the age of 16 has provided us with Personal Information, please contact us at privacy@citrincooperman.com or use the mailing address below.

Categories of Third Parties with Whom Personal Information Is Potentially Disclosed

During the 12-month period prior to the last updated date of this California Notice, we may have disclosed your Personal Information with certain categories of third parties as disclosed below. We may need to disclose your Personal Information in certain circumstances as outlined below to carry out our business. We take your privacy seriously and will only disclose your Personal Information when it is necessary to do so. Furthermore, we have put in place safeguards to protect your Personal Information and will only disclose it to third parties who have agreed to protect it as well.

- Third-party suppliers, service providers, affiliates, and business partners: Citrin Cooperman may disclose Personal Information to third-party suppliers, service providers, affiliates, and business partners to assist us in meeting business operation needs and to deliver our services and functions.
- **Vendors:** Citrin Cooperman may disclose Personal Information to vendors who provide services to the firm, such as information technology services, cloud computing services, and data storage services. This is done to allow these vendors to perform their services effectively and efficiently.
- **Investors:** Citrin Cooperman may disclose Personal Information to investors to provide them with information about the firm's financial performance and operations. This disclosure is necessary for investors to make informed investment decisions.
- **Regulators:** Citrin Cooperman may disclose Personal Information to regulators to comply with legal and regulatory requirements. For example, Citrin Cooperman may be required to disclose Personal Information to the Securities and Exchange Commission in connection with an audit of a public company.
- Law enforcement: Citrin Cooperman may disclose Personal Information to law enforcement agencies if required to do so by law. For example, Citrin Cooperman may be required to disclose Personal Information to the Federal Bureau of Investigation in connection with an investigation of a financial crime.

California's expansive definition of "sale" means that even non-monetary exchanges, such as any instance where a consumer's personal information is transferred or disclosed to a third party, in exchange for any form of valuable consideration, constitutes a "sale," regardless of whether monetary compensation is involved.

We may sell or share Personal Information with third parties for various purposes, including cross-context behavioral advertising. We use third-parties, such as Google Analytics, Sitecore, and Demandbase, to automatically collect Browsing, Contact, Device, Personal Detail and Social Media Information using Cookies and Other Tracking Technologies, such as web beacons and/or pixels on our behalf when you are using our site and other platforms. These services allow us to improve the performance of our website and to personalize the content and advertising that we show to you. In the process of setting cookies and tracking technologies, to provide Citrin Cooperman with certain analytics services on our site, some third-party providers, may retain such analytics data for their proprietary purposes, including cross context behavioral advertising. Since the retention of analytics data may impact the price of the analytics services to Citrin Cooperman, it may be deemed a Sale of Personal Information.

• Google Analytics

We use the services of Google Analytics, a web analytics service provided by Google, Inc. ("Google"). This analytical tool uses cookies and other similar technologies to help analyze how visitors use the sites. Our site offers the ability to turn off tracking cookies. For more information about the collection and use of data through Google Analytics, please refer to https://www.google.com/policies/privacy/partners. Google offers the ability to opt-out of tracking through Google Analytics cookies. For more information, please visit https://tools.google.com/dlpage/gaoptout. Google has developed the Google Analytics Opt-out Browser Add-on to provide website visitors with more choices on how their data is collected by Google Analytics. The add-on communicates with Google Analytics JavaScript (ga.js) to indicate that information about the website visit should not be sent to Google Analytics. The Google Analytics opt-out browser add-on does not prevent information from being sent to the website itself or to other web analytics services. You can also opt out of Google Analytics by declining cookies for advertising.

• Sitecore

We use the services of Sitecore, a digital experience platform (DXP) that helps us create and manage digital content and experiences. Sitecore uses cookies and other similar technologies to help analyze how visitors use the sites to create and deliver personalized digital experiences to you. Our site offers the ability to turn off tracking cookies. For more information about the collection and use of data through Sitecore, please refer to Sitecore Privacy Policy | Sitecore offers the ability to opt out of tracking through Sitecore cookies. For more information, please visit Your privacy choices (sitecore.com). Sitecore has a Privacy rights request form which you may use to facilitate Opt-out requests and provide you with more choices on how your data is collected by Sitecore. You can also opt out of Sitecore collection and processing by declining cookies for Analytics and Targeted Advertising ("Do Not Sell" Opt Out).

Demandbase

We use the services of Demandbase, a go-to-market (GTM) platform that helps us identify and engage prospective clients. Demandbase and their analytics/service providers use tracking pixels, tags, web beacons and cookies to collect information. These technologies are used in analyzing trends, tracking users' online movements, and gathering demographic information about our user base. Our site offers the ability to turn off tracking cookies. For more information about the collection and use of data through Demandbase, please refer to Demandbase Privacy Notice. Demandbase offers the ability to opt out of tracking through their Privacy Preference Center. Demandbase has a Privacy rights request form which you may use to facilitate Opt-out requests and provide you with more choices on how your data is collected by Demandbase. You can also opt out of collection and processing by declining cookies other than those that are strictly necessary.

Vena Solutions

In the course of providing our services, we may share your personal details and contact information with Vena Solutions, as we are an authorized reseller of their solutions. This sharing is essential for ensuring that you receive optimal support and access to the features of the Vena platform. We are committed to safeguarding your information and will only share what is necessary to fulfill your requests and enhance your experience with our services. For more details on how Vena Solutions handles your data, we encourage you to review their privacy policy.

• Cookies and Other Tracking Technologies

Please see our Cookies and Other Tracking Technologies Notice to better understand our use of Cookies and Other Tracking Technologies, including your rights and how you can control your Personal Information collected from Cookies and Other Tracking Technologies. Turning off cookies also does not end collection of data through pixels. Pixels, also known as web beacons or clear GIFs, are small, transparent images that can be embedded in websites and emails. Turning off cookies will prevent websites from setting cookies on your browser. However, it will not prevent pixels from setting cookies on your browser, as pixels are not cookies, but are simply images. If you are concerned about your privacy, you can control which pixels are accepted by your browser by adjusting your privacy settings. Most browsers allow you to block all pixels or to only accept pixels from certain websites. To further understand your Individual Rights, see the section, "Exercising Your Data Protection Rights," below.

We may use third-party marketing Cookies and Other Tracking Technologies to help deliver advertisements relevant to your interests. These include:

- Facebook: You can learn more about Facebook cookies and how you can control them at Meta Cookies Policy | Privacy Center | Manage your privacy on Facebook, Instagram and Messenger | Facebook Privacy.
- Google/YouTube: You can learn more about Google cookies and how you can control them at How Google uses cookies Privacy & Terms Google
- LinkedIn: You can learn more about LinkedIn cookies and how you can control them at Cookie Policy | LinkedIn
- Hubspot: You can learn more about Hubspot cookies and how you can control them at HubSpot Cookie Policy.

Third-Party Links and Services

This site and all websites linked to the website contain third-party links that can be used to access certain services provided by third parties. This Privacy Notice does not address data collection or processing by any of those parties.

Do Not Track/Global Privacy Control (GPC)

Do Not Track ("**DNT**") or "Global Privacy Control" is a preference setting offered by various internet browsers, whereby a signal is automatically sent by the browser to each website visited requesting that the user's activities are not tracked by that website and that the website does not enable onward tracking to other websites. You can usually access your browser's DNT option in your browser's preferences. If that occurs, the website visited will not recognize you upon return to that website or save your passwords or usernames, and some other features of a website may become unavailable or not function properly.

Retention

How long we retain your Personal Information depends on the purpose for which it was obtained and its nature. This includes providing you with a service you have requested from us or to comply with applicable legal requirements, including complying with the law, retaining records, resolving disputes, and enforcing our agreements. This storage period may extend beyond the term of your relationship with us. We will keep your Personal Information for the period necessary to fulfil the purposes described in this Notice unless a longer retention period is permitted or required by law and in accordance with the Citrin Cooperman Record Retention Policy.

Data Subject Retention

Client Representative

Personal information will be retained in the Citrin Cooperman's CRM for as long as we have, or need to keep a record of, a relationship with a business contact. Personal information may be held for longer periods where extended retention periods are required by law, regulation, or professional standards and to establish, exercise or defend our legal rights.

We retain the personal information processed by us for as long as is considered necessary for the purpose(s) for which it was Clients collected. Personal information may be held for longer periods where extended retention periods are required by law, regulation, or professional standards and to establish, exercise or defend our legal rights.

We retain the personal information processed by us in accordance with the terms of our client agreements.

Personal information will be retained about our contacts at our contractors, for as long as it is necessary for the purposes set out above (e.g., for as long as we have, or need to keep a record of, a relationship with a contact, which is for the duration of our relationship with a contact or their organization). Personal information may be held for longer periods where extended retention periods are required by law, regulation, or professional standards and to establish, exercise or defend our legal rights.

We retain the personal information processed by us in accordance with the terms of our Corporate agreements. Corporate Acquisition)

> collected. Personal information may be held for longer periods where extended retention periods are required by law, regulation, or professional standards and to establish, exercise or defend our legal rights.

We retain the personal information processed by us for as long as is considered necessary for the purpose(s) for which it was

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We retain the personal information processed by us for as long as is considered necessary for the purpose(s) for which it was

collected. Personal information may be held for longer periods where extended retention periods are required by law, regulation, or professional standards and to establish, exercise or defend our legal rights.

professional standards and to establish, exercise or defend our legal rights. We retain the personal information processed by us for as long as is considered necessary for the purpose(s) for which it was

collected. Personal information may be held for longer periods where extended retention periods are required by law, regulation, or

collected. Personal information may be held for longer periods where extended retention periods are required by law, regulation, or

Personal information will be retained in the Citrin Cooperman's CRM for as long as we have, or need to keep a record of, a relationship with a business contact. Personal information may be held for longer periods where extended retention periods are required by law, regulation, or professional standards and to establish, exercise or defend our legal rights.

Personal information will be retained in the Citrin Cooperman's CRM for as long as we have, or need to keep a record of, a relationship with a business contact. Personal information may be held for longer periods where extended retention periods are required by law, regulation, or professional standards and to establish, exercise or defend our legal rights.

Personal information will be retained about our contacts at our suppliers for as long as it is necessary for the purposes set out adjacent (e.g., for as long as we have, or need to keep a record of, a relationship with a contact, which is for the duration of our relationship with a contact or their organization). Personal information may be held for longer periods where extended retention periods are required by law, regulation, or professional standards and to establish, exercise or defend our legal rights.

We will retain the personal information collected by us through the Site for as long as is necessary for the purpose(s) for which it was collected as set out above, provided that personal information may be held for longer periods where extended retention periods are required by law, regulation, or professional standards, and in order to establish, exercise or defend our legal rights.

Please see Cookies and Other Tracking Technology

professional standards and to establish, exercise or defend our legal rights.

Your Data Protection Rights

Contractors

Corporate (Prospective

Employees

Event Attendees

Job Applicants

Office Visitors

Prospective Clients

Subscribers

Third Parties

Website Users

As a resident of California, you have specific rights under the California Consumer Privacy Act (CCPA) to control your personal information.

- Right to Delete Personal Information. Subject to certain exceptions, such as our ability to comply with a legal obligation, you have the right to request that we delete the Personal Information we have collected from you upon verifiable request. California residents may make Requests to Know up to twice every 12 months.
- Right to Correct Inaccurate Personal Information. Subject to certain exceptions, you can ask us to fix any inaccurate Personal Information we have about you upon verifiable request. California residents may make Requests to Know up to twice every 12 months.
- Right to Know What Personal Information Is Being Collected/Right to Access Personal Information. You can ask us what Personal Information we collect about you and how we use it upon verifiable request. California residents have the right to request and, subject to certain exemptions, receive a copy of the specific pieces of personal information that we have collected about them in the prior 12 months and to have this delivered, free of charge, either (a) by mail or (b) electronically in a portable and, to the extent technically feasible, readily usable format that allows the individual to transmit this information to another entity without hindrance. California residents also have the right to request that we provide them certain information about how we have handled their personal information in the prior 12 months, including the:
 - categories of Personal Information collected.
 - o categories of sources of Personal Information.
 - business and/or commercial purposes for collecting and selling their Personal Information.
 - o categories of third parties/with whom we have disclosed or shared their Personal Information.
 - specific pieces of Personal Information.

- Right to Know What Personal Information Is Sold or Shared and to Whom. You can ask us what Personal Information we sell or share and to whom we sell or share it with upon verifiable request. California residents have the right to request and, subject to certain exemptions, receive a copy of the specific pieces of Personal Information that we have collected about them in the prior 12 months and to have this delivered, free of charge, either (a) by mail or (b) electronically in a portable and, to the extent technically feasible, readily usable format that allows the individual to transmit this information to another entity without hindrance. California residents also have the right to request that we provide them certain information about how we have handled their Personal Information in the prior 12 months, including:
 - that we have disclosed or shared with a third party for a business purpose;
 - o categories of Personal Information collected; and
 - categories of third parties to whom the residents' Personal Information has been sold and the specific categories of Personal Information sold to each category of a third party.
- Right to Opt Out of Sale or Sharing of Personal Information. You have the right to tell us not to sell or share your Personal Information at any time (the "right to opt out" of sale/share, including Cross-Context Behavioral Advertising). The CCPA defines a "sale" as disclosing or making personal information available to a third party in exchange for money or other item of value. You can opt out of sale or share, including for Cross-Context Behavioral Advertising by going to the Data Subject Request Form; Opt-out of Sale/Sharing of My Personal Information (including for Targeted Advertising). We do not knowingly sell Personal Information about California residents who we know are under 16 years of age without their opt-in consent. You also have the right to opt out of information Citrin Cooperman shares from cross-context behavioral advertising purposes. To exercise the right to opt out of "sale" or "share," you may also indicate your cookie preferences by visiting our Cookie and Other Automated Technologies Notice.
- **Right to Limit Use and Disclosure of Sensitive Personal Information.** We only collect, process, and share Sensitive Personal Information when necessary to meet contractual obligations, fulfill our services to you, or comply with regulatory obligations. If you believe we have collected, processed, or used your Sensitive Personal Information for any other other purpose, please contact us and we will limit its use or sharing. You can ask us to limit how we use and disclose certain Sensitive Personal Information by going to the <u>Data Subject Request Form.</u>
- **Right to Object to Direct Marketing.** You have the right to object to the processing of your Personal Information for direct marketing at any time. We will provide specific information on how to opt out of our marketing initiatives within the method of communication, such as by email. If you wish to modify your preferences in respect to updates or notifications, or the mailing lists to which you subscribe, you can modify your preferences using this link. All commercial and marketing communications (e.g., notification emails and newsletters) include instructions for opting out of those communications.

Automated Decision Making

While we don't rely solely on automated systems to make decisions about you, we may use profiling techniques like analyzing background checks to assist in tasks like assessing client eligibility. This helps us ensure responsible service provision and protect both you and us.

Exercising Your Data Protection Rights

Only you, or someone you have legally authorized to act on your behalf, can make a verifiable consumer request related to your Personal Information. You can also make a verifiable consumer request on behalf of your minor child. If you are making a request on behalf of someone else, we may ask for additional information to protect their Personal Information, such as proof that you are authorized to make the request. We will only use personal information provided in a verifiable consumer request to verify the requestors' identity or authority to make the request.

We cannot respond to your request, except for requests to Opt-out of Sale/Sharing of My Personal Information or provide you with your Personal Data if we cannot verify your identity or authority to make the request, or if we cannot confirm that the Personal Data relates to you or your minor child. We may also be unable to comply with your request if we have a legal or regulatory obligation to keep your Personal Data, such as when the Personal Data is necessary to complete a transaction. Other reasons your request may be denied are if it jeopardizes the privacy of others or would be extremely impractical to honor.

Your request must:

- Provide enough information so that we can reasonably verify that you are the person whose Personal Information we collected or received from an authorized representative.
- Describe your request in enough detail so that we can understand, evaluate, and respond to it.

To the extent any of the above rights are applicable and you would like to exercise your rights, please leverage our <u>Data Subject Access Request Form</u>, by email at privacy@citrincooperman.com, or by phone at (888) 450-2221. You are not required to pay any charge for exercising your rights.

Anti-discrimination

We cannot and will not discriminate against you for exercising your CCPA rights. Specifically, we will not:

- Deny you services.
- Charge you different fees or rates for services, including using discounts or other benefits, or imposing penalties.
- Provide you with a different level or quality of services.
- Suggest that you receive different rates for services or services of a different level or quality.

Enforcement and Dispute Resolution

If you have a dispute with us regarding your CCPA rights, please leverage our <u>Data Subject Access Request Form</u> and select option "Appeal Citrin Cooperman's Refusal to Take Action on a Request." We will attempt to resolve the dispute with you directly. For more information about how California residents may file a complaint with the California Privacy Protection Agency ("CPPA") pursuant to the CCPA, see the California Privacy Protection Agency (<u>CPPA</u>) website.

Shine the Light

California residents also have the right to request that we provide you with (a) a list of certain categories of Personal Information we have disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year and (b) the identity of those third parties. To exercise this right, contact us at the address above.

Changes to This Notice

We may update this Statement occasionally. When we do, we will post the current version on this site, and we will revise the version date located at the top of this page. We encourage you to periodically review this Notice so that you will be aware of our privacy practices.

Accessible Format This Privacy Notice is available to individuals with disabilities. To access this Privacy Notice in an alternative downloaded format, please <u>click here</u>.