# **Privacy Notice**

# **Last Updated 4/18/2025**

## Privacy Notice At Collection

#### 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 Data, as defined by applicable privacy legislation, also referred to as "Personal Data," 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 Data and how to exercise such rights.

#### **Applicability**

This Privacy Notice applies to any Personal Data you provide to Citrin Cooperman and any Personal Data 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 Data 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 Data.

For purposes of this Privacy Notice, "Personal Information", also referred to as "Personal Data", means 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, identified individual or household, or any similar term defined in and governed by Applicable Data Protection Laws.

Additionally, "Sensitive Personal Information", also referred to as "Sensitive Personal Data", or "Special Categories of Data" is a subset of Personal Data that requires heightened protection. Examples include and are not limited to Information on Children, Background Check Information, Financial Detail Information, Employment Information such as citizenship, Personal Data such as gender, ethnicity, emails or post mail, racial origin, race, political affiliations, religious affiliation or beliefs, call recordings, Government Identifiers such as SSN, Personal Health Information, Contact Information such as physical address or Browsing Information such as precise geolocation (able to identify the location of an individual within 1,850 ft).

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 Data 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 Data, please do not hesitate to reach out to us.

#### **Your Personal Data**

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 Service offerings, we process broad categories of Personal Data, including Special Categories of Data, Sensitive Personal Information, or Sensitive Data. We use your Personal Data for lawful business purposes, including (i) using only Special Categories of Data, Sensitive Personal Information, or Sensitive Data 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 Data 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 Data 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 Data 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 Data We Collect

We may collect and process the following types of Personal Data:

	gory (Client	Example Personal	Purposes for	Sha	red with Third	Sources of Personal
Represe	entatives)	Identifiers	Collection/Use		Parties	Data
Browsing Information	web beacons, devic geolocation informs search history, click activity, ad tracking	kie information, IP address, e fingerprinting, imprecise ation, web browsing history, estream data, social media g data, pixels, device unique type and settings, application	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.	Yes	Information on ou performance of ou personalize the co that we show to you We may also colle	ontent and advertising ou. ct your Browsing matically through our use ner data collection
Contact Information		ess, phone number, mailing ress, physical location	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.	Yes	and may also be c	ion is collected from you ollected from other third authorized to provide us al Data.
Device Information		erating system, device unique ss, audio, video, device	We collect and process your Device Information for the following purposes:  • To provide you with our	Yes	other third parties We may also colle	ct your Device matically through our use

			products and services.		technologies on our sites.
			• 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.		
Family Informati	on	Parent's name, dependents, and other household information	We collect and process your Family Information for the following purposes:	No	Family Information is collected from you or your representatives you have authorized to provide us with your Personal Data.
			• 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.		
Financial Informati		Bank account information, bank statements, compensation data, and other financial-related details such as income, investments, benefits, tax status	We collect and process your Financial Detail Information for the following purposes:	No	Financial Detail Information is collected from prospective corporate acquisitions, you, or your representatives you have authorized to provide us with your Personal
			• To process payments.		Data.
			• 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.		
Governme Identifier Informati		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.	No	Government Identifier Information is collected from you or your representatives you have authorized to provide us with your Personal Data.
			• To comply with legal requirements.		
			• To prevent fraud and abuse.		
Personal I Informati		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.	No	Personal Detail Information is collected from you and third parties you have authorized to provide us with your Personal Data.
			• 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 Health Information	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:	No	Personal Health Information is collected from you or your representatives you have authorized to provide us with your Personal Data.	
		To assist in meal planning.			
		To comply with regulatory requirements.			
		To prevent fraud and abuse.			
Professional Experience and Affiliation Information	Professional memberships, qualifications, certifications	We collect and process your Professional Experience and Affiliation Information for the following purposes:	No	Professional Experience and Affiliation Information is collected from you, your representatives you have authorized to provide us with your Personal Data, and third parties you have authorized to	
		To provide you with the products and services that you have requested.		provide us with your Personal Data.	
		To improve our products and services.			
		To comply with legal requirements.			
		To market our products and services to you.			
		To prevent fraud and abuse.			
Special Categories of Personal Data	Genetic, biometric and health data, as well as Personal Data revealing racial and ethnic origin, political opinions, religious or ideological convictions or trade union membership.	We collect and process your Special Categories of Data for the following purposes:  To provide you with the products and services you have requested.	No	Special Categories of Data is collected from you or your representatives you have authorized to provide us with your Personal Data.	
		To improve our products and services.			
		To comply with legal requirements such as antidiscrimination 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.			
Social Media Information	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:	Yes	Social Media Information is collected from you, your clients, or your representatives you have authorized to provide us with your Personal Data.	
		To market our products and services to you.		We may also collect your Social Media Information from third-party sources, such	
		To improve our products and services.		as social media platforms (if you interact with us through your social media account), cookies and other data collection	
		To comply with legal requirements.		technologies on our sites.	
User Account Information		We collect and process your User Account Information for the following purposes:  To create and manage your account.	No	User Account Information is collected from you.  We may also collect your User Account Information from third-party payment processors, if used to process your payment for services rendered.	
		To provide you with access to our products and			

	F	Proves a conferments.	Gl	1 2-1 1	G1
		<ul><li>To improve our products and services.</li><li>To comply with legal requirements.</li></ul>			
		services.  To protect your account from unauthorized access.			

	egory (Client entatives)	Example Personal Identifiers		Purposes for Collection/Use	Sha	red with Third Parties	Sources of Personal Data
Browsing Information	web beacons, device geolocation informa search history, click activity, ad tracking	kie information, IP address, e fingerprinting, imprecise ation, web browsing history, stream data, social media data, pixels, device unique ype and settings, application	y for First Property of the Pr	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.	Yes	Information on our performance of our personalize the contract we show to you will be may also collected.	ntent and advertising ou. et your Browsing natically through our use er data collection

Contact Information		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.	Yes	Contact Information is collected from you and may also be collected from other third parties you have authorized to provide us with your Personal Data.
Device Information		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.	Yes	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.
Family 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 Data.
Financial Detail Information	Bank account information, bank statements, compensation data, and other financial-related details such as income, investments, benefits, tax status	We collect and process your Financial Detail Information for the following purposes:  To process payments.	No	Financial Detail Information is collected from prospective corporate acquisitions, you, or your representatives you have authorized to provide us with your Personal Data.

		To verify your identity.			4
		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.			
Government Identifier Information	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.	No	Government Identifier Information is collected from you or your representatives you have authorized to provide us with your Personal Data.	
		To comply with legal requirements.			
		To prevent fraud and abuse.			
Personal Detail Information	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.	No	Personal Detail Information is collected from you and third parties you have authorized to provide us with your Personal Data.	
		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 Health Information	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:	No	Personal Health Information is collected from you or your representatives you have authorized to provide us with your Personal Data.	
		To assist in meal planning.			
		To comply with regulatory requirements.			
		To prevent fraud and abuse.			
Professional Experience and Affiliation Information	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 somices that	No	Professional Experience and Affiliation Information is collected from you, your representatives you have authorized to provide us with your Personal Data, and third parties you have authorized to provide us with your Personal Data.	
		products and services that you have requested.			
		To improve our products and services.			
		To comply with legal requirements.  To market our products			
		To market our products and services to you.			

Data Categor (Clients)	Example Personal Identifiers	Purposes for Collection/ Use		with Third Sources of Personal Data
		To comply with legal requirements.		
		<ul><li>from unauthorized access.</li><li>To improve our products and services.</li></ul>		
		To protect your account     from upout borized access.		
		• To provide you with access to our products and services.		
		following purposes:  • To create and manage your account.		Information from third-party payment processors, if used to process your payment for services rendered.
User Account Information	Account age, account number, email a username, account password	your User Account Information for the	No	User Account Information is collected from you.  We may also collect your User Account
		To comply with legal requirements.		technologies on our sites.
		• To improve our products and services.		with us through your social media account), cookies and other data collection
		To market our products and services to you.		We may also collect your Social Media Information from third-party sources, such as social media platforms (if you interact
Information	Social media accounts, social media comedia history, profile information, poconnections, likes, shares, comments, behavioral data, technical data	your Social Media Information for the following purposes:	res	you, your clients, or your representatives you have authorized to provide us with your Personal Data.
Social Media	Cocial modia accounta accial modia a	With your consent, to market our products and services to you.	Yes	Social Media Information is collected from
		• To prevent fraud and abuse.		
		• To protect the safety of employees or others.		
		• To comply with legal requirements such as antidiscrimination laws.		
		• To improve our products and services.		
	political opinions, religious or ideolog convictions or trade union membersh	cical Data for the following		authorized to provide us with your Persona Data.
Special Categories of Personal Data	Genetic, biometric and health data, as Personal Data revealing racial and eth	-	No	Special Categories of Data is collected from you or your representatives you have

Authenticating Information	Passwords, PIN, mother's maiden name	We collect and process your Authenticating Information of clients, employees, and contractors for the following purposes:	No	Authenticating Information is collected from you or your representatives you have authorized to provide us with your Personal Data.
	•	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.		
	•	To improve your customer		

		experience.		
Beneficiary Contact 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:	No	Beneficiary Contact Information is collected from you or your representatives you have authorized to provide us with your Personal Data.
		• 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.		
Background Check Information	Criminal history, criminal records, driving citations	We collect and process your Background Check Information for the following purposes:	No	Background Check Information is collected from you and third parties you have authorized to provide us with your Personal Data.
		• To understand your needs and interests.		
		• To assess your suitability for our products or services.		
		• To comply with legal requirements, such as those related to anti-money laundering or know-your-customer laws.		
		• To prevent fraud and abuse.		
		<ul> <li>To improve our decision- making about marketing and sales.</li> </ul>		
Browsing Information	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	We collect and process your Browsing Information for the following purposes:  To understand your interests	Yes	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 that we show to you.
	identifier, browser type and settings, application usage data	<ul><li>and needs.</li><li>To improve the performance of our marketing campaigns.</li></ul>		We may also collect your Browsing Information automatically through our use of cookies and other data collection technologies on our sites.
		• 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.		

Children Information	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 perform services and fulfill our contractual obligations to you.  To comply with our legal obligation to protest the	No	Children Information is collected from you or your representatives you have authorized to provide us with your Personal Data.
Contact Information	Name, postal address, phone number, mailing address, email address, physical location	obligation to protect the privacy of children.  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 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.	Yes	Contact Information is collected from you and may also be collected from other third parties you have authorized to provide us with your Personal Data.
		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.		
Device Information	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 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.	Yes	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	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 Data.
Family Information	Parent's name, dependents, and other household information	We collect and process your Family Information for the following purposes:  To provide you with the	No	Family Information is collected from you or your representatives you have authorized to provide us with your Personal Data.

		products and services that you have requested.  To improve our products and services.  To contact your family members in the event of an emergency.		
Financial Detail Information	Bank account information, bank statements, compensation data, and other financial-related details such as income, investments, benefits, tax status	We collect and process your Financial Detail Information for the following purposes: 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 Data.
Government Identifier Information	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 Data.
Personal Detail Information		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  For marketing and advertising purposes.	Yes	Personal Detail Information is collected from you and third parties you have authorized to provide us with your Personal Data.

	Personal Health Information	•	We collect and process your Personal Health Information for the following purposes: To provide you with our products and services. To assist in meal planning. To improve our products and services.	No	Personal Health Information is collected from you or your representatives you have authorized to provide us with your Personal Data.
		•	To communicate with healthcare providers.		
		•	To comply with regulatory requirements.		
		•	To prevent fraud and abuse.		
	Professional Experience and Affiliation Information	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.	No	Professional Experience and Affiliation Information is collected from you, your representatives you have authorized to provide us with your Personal Data, and third parties you have authorized to provide us with your Personal Data.
		•	To improve our products and services.		
		•	To comply with legal requirements.		
		•	To market our products and services to you.		
		•	To prevent fraud and abuse.		
	Special Categories of Personal Data	Genetic, biometric and health data, as well as Personal Data revealing racial and ethnic origin, political opinions, religious or ideological convictions or trade union membership.	We collect and process your Special Categories of Data for the following purposes: To provide you with the products and services you have requested.	No	Special Categories of Data is collected from you or your representatives you have authorized to provide us with your Personal Data.
			To improve our products and services.		
			To comply with legal requirements such as antidiscrimination 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.		
•	Social Media Information Social media accounts, social media conte social media history, profile information, 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.	Yes	Social Media Information is collected from you, your clients, or your representatives you have authorized to provide us with your Personal Data.  We may also collect your Social Media
			To personalize your experience.		We may also collect your Social Media Information from third-party sources, such as social media platforms (if you
			To market our products and services to you.		interact with us through your social media account), cookies and other data collection technologies on our sites.
		•	To improve our products and services.		technologies on our sites.
		•	To comply with legal requirements.		
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User Account Information		age, account number, email add	ress or	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.		No	from you.  We may also control Information from processors, if u	ollect your User Account om third-party payment sed to process your rvices rendered.
Data Categor (Contractor		Example Personal Identifiers	Purposes for Collection/ Use		hared with Third Sources of Persona Parties Data			
Authenticating Information	Passwor		Authent clients, contract purpose To author and grant services To preve To comprequire related thealthca	enticate your identity nt you access to our or systems. ent fraud and abuse. oly with legal ments, such as those to financial services or	No	Authenticating Information is collected from you or your representatives you have authorized to provide us with your Personal Data.		es you have authorized to
Background Check Information		al history, criminal records, citations	Backgro for the f	ect and process your ound Check Information following purposes: ent fraud and abuse.	No	you a	_	formation is collected from ties you have authorized to l Data.
Contact Information	mailing		Contact followin To verify To compa about or services To contact account To impress To invit webinar To fulfil obligation To provisupport To comprequirer To preven	act you about your  ove our security.  ove our events.  e you to our events or  s.  l our contractual  ons to you.  ide you with customer  oly with legal  ments.  ent fraud and abuse.  ove our products and	Yes	Contact Information is collected from you and may also be collected from other third parties you have authorized to provide us with your Personal 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:

**Device Information** 

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

We may also collect your Device Information

		To provide you with our products and services.		automatically through our use of cookies and other data collection technologies on our sites.
		• To protect our systems and networks.		
		• To protect our users.		
		• To comply with legal requirements.		
Emergency Contact Information	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 Data.
Family Information	Parent's name, dependents, and other household information	We collect and process your Family Information for the following purposes:	No	Family Information is collected from you or your representatives you have authorized to provide us with your Personal Data.
		To contact your family members in the event of an emergency.		
Financial Detail Information	Bank account information, bank statements, compensation data, and other financial-related details such as income, investments, benefits, tax status	We collect and process your Financial Detail Information for the following purposes:  To process payments.	No	Financial Detail Information is collected from prospective corporate acquisitions, you, or your representatives you have authorized to provide us with your Personal Data.
		To verify your identity.		
		• To protect our interests.		
		• To provide you with the financial products and services that you have requested.		
		• To comply with legal requirements.		
		• To protect against fraud and abuse.		
Government Identifier Information	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:	No	Government Identifier Information is collected from you or your representatives you have authorized to provide us with your Personal Data.
		• To verify your identity.		
		To comply with legal requirements.		
		• To prevent fraud and abuse.		
Personal Detail Information	Age, gender, date of birth, marital status, nationality, signature	We collect and process your Personal Detail Information for the following purposes:	. No	Personal Detail Information is collected from you and third parties you have authorized to provide us with your Personal Data.
		• 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.		
Personal Health Information	Information related to medical payment, medical claims data, medical history, products, or equipment used,	We collect and process your Personal Health Information for the following purposes:	No	Personal Health Information is collected from you or your representatives you have authorized to provide us with your Personal Data.
	treatment	• To assist in meal planning.		
		• To comply with regulatory requirements.		
		• To prevent fraud and abuse.		

Professional Experience and Affiliation Information	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	us with your Persona	
Referral Information	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	third parties you have with your Personal D We may also collect y	is collected from you, and e authorized to provide us ata.  rour Referral Information ist on applications and
Special Categories of Personal Data	Genetic, biometric and health data, as well as Personal Data revealing racial and ethnic origin, political opinions, religious or ideological convictions or trade union membership.	We collect and process your Special Categories of Data for the following purposes:  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.	No	_	Data is collected from you es you have authorized to Personal Data.
Travel and Expense Information	Expense details, travel booking details travel history	<ul> <li>We collect and process your Travel and Expense Information for the following purposes:</li> <li>To reimburse your travel expenses.</li> <li>To track your travel expenses.</li> <li>To ensure you are complying with company travel policies.</li> <li>To improve our travel and expense management processes.</li> <li>To comply with legal requirements.</li> </ul>	No	Travel and Expense Information is collected from you.	
Workplace Welfare Information	Bullying and harassment details	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.	No	Workplace Welfare In you and our employe	nformation is collected from es.
Data Categor (Corporate)		Purposes for Collection/ Use	Sh	ared with Third Parties	Sources of Personal Data
Information m	ame, postal address, phone number, ailing address, email address, physical	We collect and process your Contact Information for the	Yes		is collected from you and l from other third parties.

(Corporate) Identifiers		Use		Parties	Data	
Contact Information		tal address, phone number, dress, email address, physical	We collect and process your Contact Information for the following purposes:  To register you as a new client.			is collected from you and I from other third parties.
			To register you as a new elient.			

		•	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.		
Device Information		•	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.	Yes	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.
Financial Detail Information		•	We collect and process your Financial Detail Information for the following purposes:  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 Data.
Government Identifier Information		•	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 Data.
Personal Detail Information	Age, gender, date of birth, marital status, nationality, signature	•	We collect and process your Personal Detail Information for the following purposes: To provide information that you have requested.	No	Personal Detail Information is collected from you and third parties you have authorized to provide us with your Personal Data.

Authenticating Information	Passwords, PIN, mother's maiden name	We collect and process your Authenticating Information of clients, employees, and contractors for the following purposes:  No Authenticating Information is collected from you or your representatives you have authorized to provide us with your Personal Data.
		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.
Beneficiary Contact Information	Name of beneficiary contact, telephone number of beneficiary contact, address of beneficiary contact, relationship to individual	We collect and process Beneficiary Contact Information of clients and employees for the following purposes:  No Beneficiary Contact Information is collected from you or your representatives you have authorized to provide us with your Personal Data.
		• To contact the beneficiary in the event of your death.
		To provide information about benefits to the 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.
Background Check Information	Criminal history, criminal records, driving citations	We collect and process your Background Check Information for the following purposes:  No Background Check Information is collected from you and third parties you have authorized to provide us with your Personal
		• To prevent fraud and abuse. Data.
		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

		<ul> <li>anti-discrimination law.</li> <li>To protect the safety and security of our employees and customers.</li> <li>To prevent fraud and abuse.</li> <li>To improve our decision-making about hiring, promotion, and other employment-related decisions.</li> </ul>		
Children Information	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 Data.
Contact Information	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.  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 you have authorized to provide us with your Personal Data.
Device Information	Device type and operating system, device unique identifier IP address, audio, video, device fingerprints	<ul> <li>We collect and process your Device Information for the following purposes:</li> <li>To provide you with our products and services.</li> <li>To protect our systems and networks.</li> <li>To protect our users.</li> <li>To comply with legal requirements.</li> </ul>	Yes	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.

Education and Skills Information		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.	No	Education and Skills Information is collected from you.  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 Data.
Employment Information	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.	No	Employment Information is collected from you or your representatives you have authorized to provide us with your Personal Data.  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 Data.
Emergency Contact Information	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 Data.
Family 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	Family Information is collected from you or your representatives you have authorized to provide us with your Personal Data.
Financial Detail Information		We collect and process your Financial Detail Information for the following purposes:  To process payroll.  To verify your identity.  To conduct due diligence.  To protect our interests.  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 Data.
Government Identifier Information		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.  To provide government-	No	Government Identifier Information is collected from you or your representatives you have authorized to provide us with your Personal Data.

		mandated benefits.		
Personal Detail Information	Age, gender, date of birth, marital status, nationality, signature	We collect and process your Personal Detail Information for the following purposes: To provide employment.	No	Personal Detail Information is collected from you and third parties you have authorized to provide us with your Personal
		To provide benefits.		Data.
		To provide information that you have requested.		
		To provide event registration.		
		To improve our products and services.		
		To improve our employment practices.		
		To improve our benefits.		
		To provide you with benefits.		
		To improve our events.		
		To comply with legal requirements.		
		To prevent fraud and abuse.		
		To market employment opportunities.		
		To market our benefits to you.		
Personal Health Information	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
		To improve our products and services.		your Personal Data.
		To improve our benefits.		
		To provide you with benefits.		
		To communicate with healthcare providers.		
		To comply with regulatory requirements.		
		To prevent fraud and abuse.		
Special Categories of Personal Data	Genetic, biometric and health data, as well as Personal Data revealing racial and ethnic origin, political opinions, religious or ideological convictions or trade union membership.	We collect and process your Special Categories of Data for the following purposes: To comply with legal requirements such as anti- discrimination laws.	No	Special Categories of Data is collected from you or your representatives you have authorized to provide us with your Personal Data.
		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.		
		To improve our benefits.		
		To provide you with benefits.		
		To communicate with healthcare providers.		
Travel and Expense Information		We collect and process your Travel and Expense Information for the following purposes: To reimburse your travel expenses.	No	Travel and Expense Information is collected from you.
		To track your travel expenses.		
	· ·	To ensure you are complying with company travel policies.		

		• T	To improve our travel and expense management processes. To comply with legal equirements.		
User Account Information	Account age, account number, email address or username, account password	<ul> <li>Uth</li> <li>To</li> <li>ac</li> <li>To</li> <li>on</li> <li>To</li> <li>un</li> <li>To</li> <li>se</li> </ul>	Ve collect and process your User Account Information for the following purposes: To create and manage your ccount. To provide you with access to our products and services. To protect your account from anauthorized access. To improve our products and ervices. To comply with legal equirements.	No	User Account Information is collected from you.  We may also collect your User Account Information from third-party payment processors, if used to process your payment for services rendered.
Workplace Welfare Information	Bullying and harassment details	• To we To re	Ve collect and process your Vorkplace Welfare Information for the following Surposes: To provide you with the Interest to which you are Intitled. To manage your compensation Ind benefits. To improve our workplace Intitled benefits. To comply with legal Interest benefits benefits. To prevent fraud and abuse.	No	Workplace Welfare Information is collected from you and our employees.

Data Category (Event	Example Personal	Purposes for Collection/	Shared with Third	Sources of Personal
Attendees)	Identifiers	Use	Parties	Data
	lress, email address, physical for the climate of t	Ve collect and process your ontact Information for the ollowing purposes:  o register you as a new ient.  o market our products and ervices.  o send you marketing atterials.  o verify your identity.  o identify potential clients.  o communicate with you cout our products and ervices.  o contact you about your ecount.  o improve our security.  o improve our events or ebinars.  o fulfill our contractual oligations to you.  o provide you with customer apport.  o comply with legal equirements.  o prevent fraud and abuse.  o improve our products and		collected from you and om other third parties you ide us with your Personal

		services.		
Device Information		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.	Yes	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	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 Data.
Family 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	Family Information is collected from you or your representatives you have authorized to provide us with your Personal Data.
Government Identifier Information		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 Data.
Personal Detail Information		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 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 Data.
Personal Health Information	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 Data.
Professional Experience and Affiliation Information	Professional memberships, qualifications, certifications	We collect and process your Professional Experience and Affiliation Information for the following purposes:  To improve our products and services.	No	Professional Experience and Affiliation Information is collected from you, your representatives you have authorized to provide us with your Personal Data, and third parties you have authorized to provide us with your Personal Data.

Social Media Information	content, socinformation shares, com	iata, tecinnicai data	Social Media Inf the following pu  To market our p services to you.	tedia Information for wing purposes: et our products and to you. ove our products and		for your cl author and We ma Inform social in throug		ial Media Information is collected from your relients, or your representatives you have norized to provide us with your Personal Damay also collect your Social Media ormation from third-party sources, such as all media platforms (if you interact with us ough your social media account), cookies and er data collection technologies on our sites.	
Data Categor Applican	-	Example Personal Identifiers	_	or Collection/ Jse	,		l witl	h Third es	Sources of Personal Data
Background Check Information	Criminal histo	ory, criminal records, driving		We collect and your Backgrous Information of following pure To understand needs and into To prevent fra abuse.  To verify your and qualificate To assess you for the position To comply with requirements those related employment I discrimination To protect the security of our and customer To prevent fra abuse.  To improve our making about promotion, are employment decisions.	und Cor the poses d you erests and an iden ions. It leg, such to aw on law, e safely e safely e safely e iden ion dother empty.	check	No	collected fr you have a	ad Check Information is rom you and third parties uthorized to provide us Personal Data.
	Name, postal address, phone number, mailing address email address, physical location			We collect any your Contact Information of following pure To verify your To communic you about our and services.  To improve or security.  To improve or security.  To invite you events or web To fulfill our or obligations to To provide you customer supe To comply with requirements.  To prevent fra abuse.  To improve or and services.	or the poses identicate we produce to our inars. contract you. the legical and an analysis and analysis analysis and analysis analysis and analysis analysis and analysis analysis analysis and analysis and analysis analy	ents. catual h	Yes	you and m other third	formation is collected from ay also be collected from parties you have to provide us with your pata.

Device Information	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.	Yes	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.
Education and Skills Information	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 verify the educational qualifications of job applicants.  To improve the company's recruitment and hiring processes.	No	Education and Skills Information is collected from you.  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 Data.
Employment Information	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 verify the educational qualifications of job applicants. To provide training and development opportunities for employees. To improve the company's recruitment and hiring processes. To comply with legal requirements.	No	Employment Information is collected from you or your representatives you have authorized to provide us with your Personal Data.  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 Data.
Emergency Contact Information	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 Data.
Government Identifier Information		•	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 Data.
Personal Detail Information		•	We collect and process your Personal Detail Information for the following purposes:  To provide employment.  To provide information that you have requested.  To provide event registration.	Yes	Personal Detail Information is collected from you and third parties you have authorized to provide us with your Personal Data.

		•	To comply with legal requirements.		
		•	To prevent fraud and abuse.		
		•	To market employment opportunities.		
		•	To market our benefits to you.		
		•	Manage our workforce and provide them with employment, training, compensation, or benefits.  • Employee hiring		
Personal Health Information	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:	No	Personal Health Information is collected from you or your representatives you have authorized to provide us with your Personal Data.
		•	To assist in meal planning.		Data.
Professional Experience and Affiliation Information	Professional memberships, qualifications, certifications		We collect and process your Professional Experience and Affiliation Information for the following purposes:	No	Professional Experience and Affiliation Information is collected from you, your representatives you have authorized to provide us with your Personal Data, and third parties you have authorized to provide us
		•	To evaluate your qualifications for employment.		with your Personal Data.
		•	To improve our products and services.		
		•	To comply with legal requirements.		
		•	To prevent fraud and abuse.		
Referral Information	Name of referral, contact information of referral, relationship of referral		We collect and process your Referral Information for the following purposes:	No	Referral Information is collected from you, and third parties you have authorized to provide us with your Personal Data.
		•	To evaluate your qualifications for employment.		We may also collect your Referral Information from references you list on applications and forms.
		•	To contact you about employment opportunities.		
		•	To improve our hiring process.		
		•	To comply with legal requirements.		
		•	To prevent fraud and abuse.		
Special Categories of Personal Data	Genetic, biometric and health data, as well as Personal Data revealing racial and ethnic origin, political opinions, religious or ideological convictions or trade union membership.		We collect and process your Special Categories of Data for the following purposes:	No	Special Categories of Data is collected from you or your representatives you have authorized to provide us with your Personal Data.
		•	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.		

Data Categor Visitor	-	Example Personal Identifiers		Purposes for Collection/ Use		ed with Third Parties	Sources of Personal Data
Contact Information				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 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	and may also be c	ion is collected from you ollected from other third authorized to provide us all Data.
Device Information				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.	Yes	other third partie We may also colle Information auto	ect your Device matically through our use ner data collection
Emergency Contact Information	information	ergency contact, contact of emergency contact, to individual, next of kin	1	We collect and process your Emergency Contact Information to contact your emergency contact in an emergency.	No	from you or your	ct Information is collected representatives you have vide us with your Personal
Government Identifier Information	number, pass		• 7	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	collected from you	tifier Information is a or your representatives red to provide us with your
Personal Detail Information	Age, gender, nationality, s			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.	No	from you and thir	aformation is collected d parties you have vide us with your Personal

			To comply with legal requirem To prevent fraud and abuse.	ents.			
Personal Health Information	1 3		We collect and process your Personal Health Information for the following purposes:  To assist in meal planning.			from you or your re	aformation is collected epresentatives you have ide us with your Personal
Data Category Clier	_	Example Personal Identifiers	Purposes for Collectio Use	n/	Shar	ed with Third Parties	Sources of Personal Data
Background Check Information	driving citations	Balling property of the proper	We collect and process your Background Check Information for the following purposes:  To understand your needs and interests.  To assess your suitability for our products or services.  To comply with legal requirements, such as those related to anti-money aundering or know-your-customer laws.  To prevent fraud and abuse.  To improve our decision-making about marketing and sales.		you ar provid	nd third parties you de us with your Per	mation is collected from a have authorized to sonal Data.
Contact Information	_	s, email address, physical  To cl  To se  To all  Se  To ol  To se  To ol	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 comply with legal requirements.  To prevent fraud and abuse.  To improve our products and services.	Yes	may a have a Data.  Conta public netwo other	may also be collected from other third parties you have authorized to provide us with your Personal Data.  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.	
Device	Doving type one	l operating system. W	We collect and process your	Voc	Dovrig	o Information is as	llected from you, other

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

We collect and process your 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.

Device

Information

		• To protect our systems and networks.		
		• To protect our users.		
		• To comply with legal requirements.		
Emergency Contact Information	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 Data.
Government Identifier Information	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 Data.
Personal Detail Information	Age, gender, date of birth, marital status, nationality, signature	We collect and process your Personal Detail Information for the following purposes:	No	Personal Detail Information is collected from you and third parties you have authorized to provide us with your Personal Data.
		<ul> <li>To provide products and services that you have requested.</li> <li>To provide information that you have requested.</li> </ul>		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.
		<ul><li>To provide event registration.</li><li>To improve our products and services.</li></ul>		
		<ul><li>To improve our events.</li><li>To comply with legal requirements.</li></ul>		
		<ul><li>To prevent fraud and abuse.</li><li>To market our products and services.</li></ul>		
Personal Health Information	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 Data.
Professional Experience and Affiliation Information	Professional memberships, qualifications, certifications	We collect and process your Professional Experience and Affiliation Information for the following purposes:	No	Professional Experience and Affiliation Information is collected from you, your representatives you have authorized to provide us with your Personal Data, and third parties you have authorized to provide us with your Personal
		<ul><li>To improve our products and services.</li><li>To comply with legal requirements.</li></ul>		Data.
		<ul><li>To market our products and services to you.</li><li>To prevent fraud and abuse.</li></ul>		

Social I		content, so information shares, con	lia accounts, social media ocial media history, profile n, posts, connections, likes, nments, interactions, 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.	Yes	Social Media Information is collected from you, your clients, or your representatives you have authorized to provide us with your Personal Data. 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 Example Personal (Subscribers) Identifiers				Purposes for Collection, Use	/	Shared with Third Parties	Sources of Personal Data
Contactinform	nation			To ser To ab ser To ob To ob To sur To	e collect and process your ontact Information for the lowing purposes: market our products and rvices. send you marketing aterials. verify your identity. identify potential clients. communicate with you out our products and rvices. contact you about your count. improve our security. improve our events. invite you to our events or chinars. fulfill our contractual ligations to you. provide you with customer pport. comply with legal quirements. prevent fraud and abuse. improve our products and rvices.	Yes	also be collected from other	ollected from you and may her third parties you have with your Personal Data.
Emerge Contact	ency N	levice unique udio, video, d	•	To ser To reconser	e collect and process your evice Information for the lowing purposes: provide you with our oducts and services. improve our products and rvices that you have quested. protect our systems and tworks. protect our users. comply with legal quirements. market our products and rvices to you.	Yes	data collection technolog	ers. Device Information ur use of cookies and other
Inform			emergency contact, o individual, next of kin	Intern	formation to contact your nergency contact in an nergency.		you or your representative provide us with your Per	

Personal Detail Information	Age, gender, date of birth, marital status, nationality, signature	We collect and process your Personal Detail Information for the following purposes:	No	Personal Detail Information is collected from you and third parties you have authorized to provide us with your Personal Data.
	•	To provide products and services that you have 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.		
Social Media Information	Social media accounts, social media content, social media history, profile information, posts, connections, likes,	We collect and process your Social Media Information for the following purposes:	Yes	Social Media Information is collected from you, your clients, or your representatives you have authorized to provide us with your Personal Data.
	shares, comments, interactions, behavioral data, technical data	To understand your interests and preferences.		We may also collect your Social Media Information from third-party sources, such as social media
	•	To personalize your experience.		platforms (if you interact with us through your social media account), cookies and other data collection technologies on our sites.
	•	To market our products and services to you.		
	•	To improve our products and services.		
	•	To comply with legal requirements.		

Data Category (Third		Example Personal	1 1		ed with Third	Sources of Personal
Parties)		Identifiers			Parties	Data
Contact Information		address, phone number, ess, email address, physical	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 improve our security.  To improve our events.  To invite you to 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.	Yes	and may also be	tion is collected from you collected from other third authorized to provide us al Data.

Device Information	Device type and operating system, device unique identifier, IP address, audio, video,	We collect and process your Device Information for the	Yes	Device Information is collected from you, other third parties or subscribers.
	device fingerprints	<ul><li>following purposes:</li><li>To provide you with our products and services.</li></ul>		We may also collect your Device Information automatically through our use of cookies and other data collection
		• To protect our systems and networks.		technologies on our sites.
		• To protect our users.		
		• To comply with legal requirements.		
Emergency Contact Information	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 Data.
Financial Detail Information	Bank account information, bank statements, compensation data, and other financial-related details such as income, investments, benefits, tax status	<ul> <li>We collect and process your Financial Detail Information for the following purposes:</li> <li>To process payments.</li> <li>To verify your identity.</li> <li>To conduct due diligence.</li> <li>To protect our interests.</li> <li>To negotiate acquisitions.</li> <li>To comply with legal requirements.</li> <li>To protect against fraud and abuse.</li> </ul>	No	Financial Detail Information is collected from prospective corporate acquisitions, you, or your representatives you have authorized to provide us with your Personal Data.
Government Identifier Information	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 Data.
Personal Detail Information	Age, gender, date of birth, marital status, nationality, signature	We collect and process your Personal Detail Information for the following purposes:  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 Data.
Personal Health Information	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.  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 Data.

			provide us with your Personal Data.		
	<ul> <li>To evaluate your qualifications for employment.</li> </ul>		We may also collect your Referral Information from references you list on		
	• To contact you about employment opportunities.		applications and forms.		
	• To improve our hiring process.				
	• To comply with legal requirements.				
	• To prevent fraud and abuse.				
		No	Special Categories of Data is collected from you or your representatives you have authorized to provide us with your Personal Data.		
Bullying and harassment details	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.	No	Workplace Welfare Information is collected from you and our employees.		
-	Purposes for Collection/ Use		Shared with Third Parties Sources of Personal Data		
<u> </u>	Personal Data revealing racial and ethnic origin, political opinions, religious or ideological convictions or trade union membership.  Bullying and harassment details  Bullying and harassment details  Example Personal Identifiers	Genetic, biometric and health data, as well as Personal Data revealing racial and ethnic origin, political opinions, religious or ideological convictions or trade union membership.  We collect and process your Special Categories of Data for the following purposes:  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.  Bullying and harassment details  We collect and process your Workplace Welfare Information for the following purposes:  To improve our workplace welfare programs.  To comply with legal requirements workplace welfare programs.  To prevent fraud and abuse.	Genetic, biometric and health data, as well as Personal Data revealing racial and ethnic origin, political opinions, religious or ideological convictions or trade union membership.  We collect and process your Special Categories of Data 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.  Bullying and harassment details  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.  No  Special Categories of Data for the following purposes:  To comply with legal requirements of training programs or the impact of diversity in the workplace.  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.		

Users)		Identifiers	Use		Parties		Data
Browsing	beacons, device information, well clickstream data	cookie information, IP address, we fingerprinting, imprecise geolocate browsing history, search history, social media activity, ad tracking ice unique identifier, browser type tion usage data	ation y, ng oe and •	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.	Yes	Information on our performance of our personalize the con we show to you.  We may also collect Information autom	tent and advertising that
Contact Information	Name, postal ad email address, p	dress, phone number, mailing ad hysical location	ldress,	We collect and process your Contact Information for the following purposes:	Yes	may also be collected	n is collected from you and ed from other third parties d to provide us with your

		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 provide you with customer support.		
		To comply with legal requirements.		
		To prevent fraud and abuse.		
		To improve our products and services.		
Device Information	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:	Yes	Device Information is collected from you, other third parties or subscribers.  We may also collect your Device Information
		To provide you with our products and services.		automatically through our use of cookies and other data collection technologies on our sites.
		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.		
Social Media Information	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:	Yes	Social Media Information is collected from you, your clients, or your representatives you have authorized to provide us with your Personal Data.
		To understand your interests and preferences.		We may also collect your Social Media Information from third-party sources, such as social media platforms (if you interact with us
		To personalize your experience.		through your social media account), cookies and other data collection technologies on our sites.
		To market our products and services to you.		
		To improve our products and services.		
		To comply with legal requirements.		
Browsing and I			<u> </u>	

### **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 website, 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 link.

Please visit our Cookies and Other Tracking Technologies Notice for more information.

#### Children's Data

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

Certain Citrin Cooperman services, may process Personal Data related to Children, such as their date of birth, address, or other identifiable information to fulfill our service obligations to you. This Personal Data 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 Data 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 Data, please contact us at privacy@citrincooperman.com or use the mailing address below.

#### Categories of Third Parties to Whom Personal Data Is Potentially Disclosed

We may need to disclose your Personal Data in certain circumstances as outlined below to carry out our business. We take your privacy seriously and will only disclose your Personal Data when it is necessary to do so. Furthermore, we have put safeguards in place to protect your Personal Data 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 Data 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 Data 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 Data 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 Data to regulators to comply with legal and regulatory requirements. For example, Citrin Cooperman may be required to disclose Personal Data to the Securities and Exchange Commission in connection with an audit of a public company.

**Law enforcement:** Citrin Cooperman may disclose Personal Data to law enforcement agencies if required to do so by law. For example, Citrin Cooperman may be required to disclose Personal Data to the Federal Bureau of Investigation in connection with an investigation of a financial crime.

#### 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)

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.

#### Lawful Basis for Processing Your Personal Data

We rely on the following legal basis to collect and use your Personal Data:

**Consent:** We may ask for your permission to use your Personal Data, such as if we need your permission to process sensitive information about you or engage in certain marketing activities. If we obtain your consent as a legal basis for processing your data, you can revoke your consent at any time.

**Contract:** Where we offer services or enter into a contract with you to provide services, we will collect and use your Personal Data where necessary to enable us to take steps to offer you the services, process your acceptance of the offer and fulfil our obligations in the contract with you.

**Legal obligation:** We may need to use your Personal Data to comply with applicable legal requirements.

Vital interest: We may need to use your Personal Data to protect your life or in the event of a medical emergency.

**Legitimate interest:** We have a legitimate business interest in using your Personal Data to operate, improve, and market our business, websites, and services.

#### International Transfers of Your Personal Data

We may need to transfer your Personal Data to countries other than the country in which the data was originally collected for the purposes described in this Privacy Notice. When we do, if the applicable law requires, we use a variety of legal mechanisms to help ensure your rights and protections travel with your data, such as:

Internal Data Transfer Agreements: We ensure transfers between Citrin Cooperman entities are covered by agreements that incorporate prescribed contractual wording, such as the EU Commissioner's Standard Contractual Clauses (SCCs), which contractually oblige each party to ensure that Personal Data receives an adequate and consistent level of protection.

Contracts (Master Service Agreements [MSAs (Master Service Agreement)], Engagement Letters, Statement of Work [SoW]): Where we transfer to or receive your Personal Data from third parties who help provide our products and services, we obtain contractual commitments from them to protect your Personal Data, which incorporate standard contract clauses (where required/applicable).

#### **Mergers and Acquisitions**

In the event Citrin Cooperman goes through a business transition, such as a merger, or the acquisition or sale of all or a portion of its assets, your Personal Data may be among the assets transferred.

#### **How We Protect and Store Your Personal Data**

Citrin Cooperman takes the protection of Personal Data very seriously and has in place several safeguards to protect the confidentiality and security of Personal Data. These safeguards include:

**System-level restrictions** for access to programs and data, such as appropriate password safeguards and secure sign-on mechanisms, such as dual authentication, are in place.

**Restricted access to programs and data safeguards**, such as user provisioning, deprovisioning, and recertification controls, are in place.

Role-based access to programs and data safeguards, including Privileged User Access controls, are in place.

**Data minimization safeguards,** including limiting access to Personal Data to authorized individuals are in place.

**Data quality safeguards** are in place to ensure the integrity of data, prevent errors, and improve the efficiency of data processing.

**Encryption safeguards** are in place to protect data in transit and at rest.

**Logging and monitoring controls** are in place to protect the integrity of Personal Data.

Citrin Cooperman also has several policies and procedures in place to govern the collection, use, share, sale, disclose, retention and disposal of Personal Data. These policies and procedures are designed to ensure that Personal Data is collected, used, and disclosed in a lawful, fair, and transparent manner. How long we retain your Personal Data depends on the purposes for which it was obtained and its nature. We will keep your Personal Data 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.

#### Retention

How long we retain your Personal Data 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 Data 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.

#### **Your Data Protection Rights**

You may have certain rights over your Personal Data that enable you to control the use of any Personal Data about you that we collect and use.

**Right to Access.** You may have the right under certain circumstances to request and receive a copy of your Personal Data, upon verifiable request.

**Right to Data Portability.** You may have the right under certain circumstances to request that your Personal Data be provided to you and/or transferred to a third party. To the extent it is technically feasible, we can provide your Personal Data in a structured, commonly used, machine-readable format, upon verifiable request. Note that this right only applies to automated information that you initially provided for our use or to perform a contract with you.

**Right to Recertification (Correction).** You may have the right to request corrections of your Personal Data, upon verifiable request where it is inaccurate or out of date.

**Right to Be Forgotten (Right to Erasure).** You may have the right under certain circumstances to have your Personal Data erased. You can request we delete Personal Data where you do not believe there is reason for us continuing to process it, or where you believe we collected or are using it unlawfully, where erasure is required by law or where you have opted-out of our processing, upon verifiable request. In certain cases, we may not be able to comply fully or at all with your correction request for legal reasons, and to the extent we are permitted to, we will notify you of the reasons.

Right to Opt Out of Sale/Sharing of Personal Data for Purposes of Targeted Advertising. You may have the right to opt out of Sale/Share, including Targeted Advertising by clicking Opt-out of Sale/Sharing of My Personal Information (including for Targeted Advertising). Please see our Cookies and Other Tracking Technologies Notice to better understand our use of cookies, as well as your rights involving cookies and other areas of automated collection.

**Right to Object to Direct Marketing.** You have the right to object to the use of your Personal Data for direct marketing at any time. If you wish to modify your preferences in respect to marketing 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.

**Right to Withdraw Consent.** You have the right under certain circumstances, such as where we rely on your consent to process your Personal Data, to withdraw your consent. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to continue to provide certain products or services to you. We will advise you if this is the case when you withdraw your consent.

Depending on your residency, you may be entitled to additional data rights. Please see <u>Jurisdictional/Territorial Privacy Notices</u> for a further understanding of your rights.

In certain cases, such as for legal reasons, we may not be able to comply fully or at all with your correction request, and to the extent we are permitted to, we will notify you of the reasons. You are not required to pay any charge for exercising your rights. 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>, or contact us by email at privacy@citrincooperman.com, or by phone at (888) 450-2221.

#### 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 Data. 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 Data, such as proof that you are authorized to make the request. We will only use personal data 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 Data (including for Targeted Advertising 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 Data 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.

### **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>.

#### **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.