

Privacy Notice

California Consumer Privacy Act

Last Updated 03/14/2024

Privacy Policy

Introduction

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

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

Applicability

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

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

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

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

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

Your Personal Information

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

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

We process your Personal Information for the following purposes:

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

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

Type of Personal Information We Collect

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

Data Category (Client Representatives)	Example Personal Identifiers	Purposes for Collection/Use	Shared with Third Parties	Sources of Personal Information
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Browsing Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

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

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

Yes

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

Contact Information

(Cal. Civ. Code § 1798.80(e))

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

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

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.

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

Yes

Device Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

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

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

Yes

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

Family Information

(Cal. Civ. Code § 1798.80(e))

- Customer records information
- Identifiers

Parent's name, dependents, and other household information

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

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

No

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

- To contact your family members in the event of an emergency.

We collect and process your Financial Detail Information for the following purposes:

- To process payments.
- To verify your identity.
- To conduct due diligence.
- To protect our interests.
- To negotiate acquisitions.
- To provide you with the financial products and services that you have requested.
- To comply with legal requirements.
- To protect against fraud and abuse.

No Financial Detail Information is collected from prospective corporate acquisitions, you, or your representatives you have authorized to provide us with your Personal Information.

Financial Detail Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Customer records information
- Commercial information

Bank account information, bank statements, compensation data, and other financial-related details such as income, investments, benefits, tax status

Government Identifier Information

(Cal. Civ. Code § 1798.80(e))

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

Driver's license, national identification number, passport number, social security number, national identity card details

We collect and process your Government Identifier Information for the following purposes:

- To verify your identity.
- To comply with legal requirements.
- To prevent fraud and abuse.

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

Personal Detail Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

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

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

Personal Health Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

- To assist in meal planning.

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

Professional Experience and Affiliation Information

(Cal. Civ. Code § 1798.80(e))

- Customer records

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

No Professional Experience and Affiliation Information is collected from you, your representatives, and third parties you have authorized to provide us with your Personal Information.

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

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

Sensitive Personal Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

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

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

Social Media Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

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

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

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

User Account Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Customer records information

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

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

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

User Account Information is collected from you.

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

Data Category (Client Representatives)	Example Personal Identifiers	Purposes for Collection/Use	Shared with Third Parties	Sources of Personal Information
Browsing Information (Cal. Civ. Code § 1798.80(e))	Browsing time, cookie information, IP address, web beacons, device fingerprinting, imprecise geolocation information, web browsing history, search history, clickstream data, social media activity, ad tracking data, pixels, device unique identifier, browser type and settings, application	We collect and process your Browsing Information for the following purposes: • To understand your interests and needs.	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.

- electronic network activity information
- Geolocation data usage data
- Inferences

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

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

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

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

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

Contact Information

(Cal. Civ. Code § 1798.80(e))

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

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

Device Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

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

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

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

Family Information

(Cal. Civ. Code § 1798.80(e))

- Customer records information
- Identifiers

Parent's name, dependents, and other household information

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

- To provide you with the products and services that you have requested.
- To improve our products and services.
- To contact your family members in the event of an emergency.

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

Financial Detail Information	(Cal. Civ. Code § 1798.80(e))	<ul style="list-style-type: none"> Identifiers Customer records information Commercial information 	Bank account information, bank statements, compensation data, and other financial-related details such as income, investments, benefits, tax status	We collect and process your Financial Detail Information for the following purposes:	<ul style="list-style-type: none"> To process payments. To verify your identity. To conduct due diligence. To protect our interests. To negotiate acquisitions. To provide you with the financial products and services that you have requested. To comply with legal requirements. To protect against fraud and abuse. 	No Financial Detail Information is collected from prospective corporate acquisitions, you, or your representatives you have authorized to provide us with your Personal Information.
Government Identifier Information	(Cal. Civ. Code § 1798.80(e))	<ul style="list-style-type: none"> Identifiers Customer records information Characteristics of protected classifications under California or federal law 	Driver's license, national identification number, passport number, social security number, national identity card details	We collect and process your Government Identifier Information for the following purposes:	<ul style="list-style-type: none"> To verify your identity. To comply with legal requirements. To prevent fraud and abuse. 	No Government Identifier Information is collected from you or your representatives you have authorized to provide us with your Personal Information.
Personal Detail Information	(Cal. Civ. Code § 1798.80(e))	<ul style="list-style-type: none"> Identifiers Customer records information Characteristics of protected classifications under California or federal law 	Age, gender, date of birth, marital status, nationality, signature	We collect and process your Personal Detail Information for the following purposes:	<ul style="list-style-type: none"> To provide products and services that you have requested. To provide information that you have requested. To provide event registration. To improve our products and services. To improve our events. To comply with legal requirements. To prevent fraud and abuse. To market our products and services. 	No Personal Detail Information is collected from you and third parties you have authorized to provide us with your Personal Information.
Personal Health Information	(Cal. Civ. Code § 1798.80(e))	<ul style="list-style-type: none"> Identifiers Customer records information Characteristics of protected classifications under California or federal law 	Information related to medical payment, medical claims data, medical history, products, or equipment used, health plan beneficiary, medical treatment	We collect and process your Personal Health Information for the following purposes:	<ul style="list-style-type: none"> To assist in meal planning. 	No Personal Health Information is collected from you or your representatives you have authorized to provide us with your Personal Information.
Professional Experience and Affiliation Information	(Cal. Civ. Code § 1798.80(e))	<ul style="list-style-type: none"> Customer records information Education information Professional or 	Professional memberships, qualifications, certifications	We collect and process your Professional Experience and Affiliation Information for the following purposes:	<ul style="list-style-type: none"> To provide you with the products and services that you have requested. To improve our products and services. 	No Professional Experience and Affiliation Information is collected from you, your representatives, and third parties you have authorized to provide us with your Personal Information.

- employment-related information
- Inferences

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

Sensitive Personal Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

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

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

Social Media Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

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

No Social Media Information is collected from you, your clients, or your representatives you have authorized to provide us with your Personal Information.

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

User Account Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Customer records information

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

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

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

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.

Data Category (Clients)

Example Personal Identifiers

Purposes for Collection/ Use

Shared with Third Parties

Sources of Personal Information

Authenticating Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers

Passwords, PIN, mother's maiden name

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

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

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

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:	<ul style="list-style-type: none"> • To contact your beneficiary in the event of your death. • To provide information about benefits to your beneficiary. • To comply with legal requirements, such as those related to employment law or tax law. • To protect the privacy of your beneficiary contact information. 	No Beneficiary Contact Information is collected from you or your representatives you have authorized to provide us with your Personal Information.
Background Check Information	Criminal history, criminal records, driving citations	We collect and process your Background Check Information for the following purposes:	<ul style="list-style-type: none"> • 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. • To improve our decision-making about marketing and sales. 	No Background Check Information is collected from you and third parties you have authorized to provide us with your Personal Information.
(Cal. Civ. Code § 1798.80(e))	<ul style="list-style-type: none"> • Identifiers • Customer records information • Characteristics of protected classifications under California or federal law • Professional or employment-related information • Education information 	We collect and process your Browsing Information for the following purposes:	<ul style="list-style-type: none"> • 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 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.
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 identifier, browser type and settings, application usage data	We collect and process Clients' Children Information only with the consent of a parent or guardian for the following purposes:	<ul style="list-style-type: none"> • To perform services and 	No Children Information is collected from you or your representatives you have authorized to provide us with your Personal Information.
(Cal. Civ. Code § 1798.80(e))	<ul style="list-style-type: none"> • Identifiers • Internet or other electronic network activity information • Geolocation data • Inferences 	We collect and process Clients' Children Information only with the consent of a parent or guardian for the following purposes:	<ul style="list-style-type: none"> • To perform services and 	No Children Information is collected from you or your representatives you have authorized to provide us with your Personal Information.
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:	<ul style="list-style-type: none"> • To perform services and 	No Children Information is collected from you or your representatives you have authorized to provide us with your Personal Information.

- fulfill our contractual obligations to you.
- To comply with our legal obligation to protect the privacy of children.

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

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

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

Contact Information

(Cal. Civ. Code § 1798.80(e))

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

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

Device Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

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

Device Information is collected from you, other third parties or subscribers. Yes We may also collect your Device Information automatically through our use of cookies and other data collection technologies on our sites.

Emergency Contact Information

(Cal. Civ. Code § 1798.80(e))

- Customer records information
- Identifiers

Name of emergency contact, contact information of emergency contact, relationship to individual, next of kin

We collect and process your Emergency Contact Information to contact your emergency contact in an emergency.

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

Family Information

(Cal. Civ. Code § 1798.80(e))

- Customer records information
- Identifiers

Parent's name, dependents, and other household information

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

- To provide you with the products and services that you have requested.
- To improve our products and services.
- To contact your family members in the event of an emergency.

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

Financial Detail Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Customer records information
- Commercial information

Bank account information, bank statements, compensation data, and other financial-related details such as income, investments, benefits, tax status

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 Information.

Government Identifier Information

(Cal. Civ. Code § 1798.80(e))

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

Driver's license, national identification number, passport number, social security number, national identity card details

We collect and process your Government Identifier Information for the following purposes:

- To verify your identity.
- To comply with legal requirements.
- To prevent fraud and abuse.

No

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

Personal Detail Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

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

No

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

Personal Health Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

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

No

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

Professional Experience and Affiliation Information

(Cal. Civ. Code § 1798.80(e))

- Customer records 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, and third parties you have authorized to provide us with your Personal Information.

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

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

Sensitive Personal Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

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

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

Social Media Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

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

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

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

User Account Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Customer records information

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

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

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

User Account Information is collected from you.

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

Data Category (Contractor)

Example Personal Identifiers

Purposes for Collection/ Use

Shared with Third Parties

Sources of Personal Information

Authenticating Information

(Cal. Civ. Code § 1798.80(e))

Passwords, PIN, mother's maiden name

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

No Authenticating information is collected from you or your representatives you have authorized to provide us with your Personal

- Identifiers

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

Information.

Background Check Information

(Cal. Civ. Code § 1798.80(e))

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

Criminal history, criminal records, driving citations

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

- To prevent fraud and abuse.

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

Contact Information

(Cal. Civ. Code § 1798.80(e))

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

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

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.

Device Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

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

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

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

Emergency Contact Information

(Cal. Civ. Code § 1798.80(e))

- Customer records information
- Identifiers

Name of emergency contact, contact information of emergency contact, relationship to individual, next of kin

We collect and process your Emergency Contact Information to contact your emergency contact in an emergency.

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

Family Information

(Cal. Civ. Code § 1798.80(e))

- Customer records information
- Identifiers

Parent's name, dependents, and other household information

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

- To contact your family members in the event of an emergency.

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

Financial Detail Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Customer records information
- Commercial information

Bank account information, bank statements, compensation data, and other financial-related details such as income, investments, benefits, tax status

We collect and process your Financial Detail Information for the following purposes:

- To process payments.
- 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.

No Financial Detail Information is collected from prospective corporate acquisitions, you, or your representatives you have authorized to provide us with your Personal Information.

Government Identifier Information

(Cal. Civ. Code § 1798.80(e))

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

Driver's license, national identification number, passport number, social security number, national identity card details

We collect and process your Government Identifier Information for the following purposes:

- To verify your identity.
- To comply with legal requirements.
- To prevent fraud and abuse.

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

Personal Detail Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

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

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

Personal Health Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

- To assist in meal planning.

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

Professional Experience and Affiliation Information

(Cal. Civ. Code § 1798.80(e))

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

Professional memberships, qualifications, certifications

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

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

No Professional Experience and Affiliation Information is collected from you, your representatives, and third parties you have authorized to provide us with your Personal Information.

Referral Information

(Cal. Civ. Code § 1798.80(e))

- Professional or employment-related information
- Inferences

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

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

- To evaluate your qualifications for employment.
- To contact you about employment opportunities.
- To improve our hiring process.
- To comply with legal requirements.
- To prevent fraud and abuse.

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

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

Sensitive Personal Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

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

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

Travel and Expense Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Customer records information
- Commercial information
- Geolocation data

Expense details, travel booking details, travel history

We collect and process your Travel and Expense Information for the following purposes:

- To reimburse your travel expenses.
- To track your travel expenses.
- To ensure you are complying with company travel policies.
- To improve our travel and

No Travel and Expense Information is collected from you.

- Inferences

- expense management processes.
- To comply with legal requirements.

Workplace Welfare Information

(Cal. Civ. Code § 1798.80(e))

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

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.

Data Category (Corporate)

Example Personal Identifiers

Purposes for Collection/ Use

Shared with Third Parties

Sources of Personal Information

Contact Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

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

Yes

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

Device Information

(Cal. Civ. Code § 1798.80(e))

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

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 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.

- similar information
- Inferences

Financial Detail Information	(Cal. Civ. Code § 1798.80(e))	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:	<ul style="list-style-type: none"> • To verify your identity. • To conduct due diligence. • To protect our interests. • To negotiate acquisitions. • To provide you with the financial products and services that you have requested. • To comply with legal requirements. • To protect against fraud and abuse. 	No	Financial Detail Information is collected from prospective corporate acquisitions, you, or your representatives you have authorized to provide us with your Personal Information.
Government Identifier Information	(Cal. Civ. Code § 1798.80(e))	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:	<ul style="list-style-type: none"> • To verify your identity. • To comply with legal requirements. • To prevent fraud and abuse. 	No	Government Identifier Information is collected from you or your representatives you have authorized to provide us with your Personal Information.
Personal Detail Information	(Cal. Civ. Code § 1798.80(e))	Age, gender, date of birth, marital status, nationality, signature	We collect and process your Personal Detail Information for the following purposes:	<ul style="list-style-type: none"> • To provide information that you have requested. • To provide event registration. • To improve our products and services. • To improve our events. • To comply with legal requirements. • To prevent fraud and abuse. • To market our products and services. 	No	Personal Detail Information is collected from you and third parties you have authorized to provide us with your Personal Information.
Personal Health Information	(Cal. Civ. Code § 1798.80(e))	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:	<ul style="list-style-type: none"> • 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 Information.

Data Category (Employees)	Example Personal Identifiers	Purposes for Collection/ Use	Shared with Third Parties	Sources of Personal Information
Authenticating Information	(Cal. Civ. Code § 1798.80(e)) Passwords, PIN, mother's maiden name	We collect and process your Authenticating Information for the following purposes:	<ul style="list-style-type: none"> • 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. 	No Authenticating information is collected from you or your representatives you have authorized to provide us with your Personal Information.

- To improve the security of our systems and services.

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

- To contact your beneficiary in the event of your death.
- To provide information about benefits to your beneficiary.
- To comply with legal requirements, such as those related to employment law or tax law.
- To protect the privacy of your beneficiary contact information.

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

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

- To prevent fraud and abuse.
- To verify your identity and qualifications.
- To assess your suitability for the position.
- To comply with legal requirements, such as those related to employment law or anti-discrimination law.
- To protect the safety and security of our employees and customers.
- To prevent fraud and abuse.
- To improve our decision-making about hiring, promotion, and other employment-related decisions.

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

We collect and process Clients' Children Information only with the consent of a parent or guardian for the following purposes:

- To comply with our legal obligation to protect the privacy of children.
- To provide employees with benefits.
- To provide employees with services.

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

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

- To verify your identity.
- To communicate with you about our products and services.
- To contact you about your account.
- To improve our security.
- To improve our events.
- To invite you to our events or webinars.

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

Beneficiary Contact Information

Name of beneficiary contact, telephone number of beneficiary contact, address of beneficiary contact, relationship to individual

Background Check Information

(Cal. Civ. Code § 1798.80(e))

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

Criminal history, criminal records, driving citations

Children Information

Names of children, age or gender of children, birth date, address of children, activities associated with children

Contact Information

(Cal. Civ. Code § 1798.80(e))

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

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

- To fulfill our contractual obligations to you.
- To provide you with customer support.
- To comply with legal requirements.
- To prevent fraud and abuse.
- To improve our products and services.

Device Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

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

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

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

Education and Skills Information

(Cal. Civ. Code § 1798.80(e))

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

Academic transcripts, educational degrees, education training and history, languages, letters of recommendation

We collect and process your Education and Skills Information for the following purposes:

- To assess the potential advancement of employees.
- To provide training and development opportunities for employees.
- To improve the company's recruitment and hiring processes.

Education and Skills Information is collected from you.

No We may also collect Education and Skills Information directly from third-party recruiters you are using to find employment which you have authorized to provide us with your Personal Information.

Employment Information

(Cal. Civ. Code § 1798.80(e))

- Customer records information
- Professional or employment-related information
- Audio, electronic, visual, thermal, olfactory, or similar information
- Characteristics of protected classifications under California or federal law
- Inferences

Benefits and entitlements data, company/entity, contract type, hours of work, job title, salary/wage, workers compensation claims, start date, end date, reason for termination, employee performance results, record of absence, time tracking, annual leave, office location, previous work history, grievances and complaints, health and safety-related information and reporting, job application details, disciplinary action, exit interview

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

- To assess the potential advancement of employees.
- To provide training and development opportunities for employees.
- To manage our workforce.
- To comply with legal requirements.
- To provide you with the benefits and services to which you are entitled.

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

No We may also collect Education and Skills Information directly from third-party recruiters you are using to find employment which you have authorized to provide us with your Personal Information.

Emergency Contact Information

(Cal. Civ. Code § 1798.80(e))

- Customer records information
- Identifiers

Name of emergency contact, contact information of emergency contact, relationship to individual, next of kin

We collect and process your Emergency Contact Information to contact your emergency contact in an emergency.

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

No

Family Information

(Cal. Civ. Code § 1798.80(e))

- Customer records

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

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

No

- information
- Identifiers

an emergency.

Financial Detail Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Customer records information
- Commercial information

Bank account information, bank statements, compensation data, and other financial-related details such as income, investments, benefits, tax status

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 Information.

Government Identifier Information

(Cal. Civ. Code § 1798.80(e))

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

Driver's license, national identification number, passport number, social security number, national identity card details

We collect and process your Government Identifier Information for the following purposes:

- To verify your identity.
- To comply with legal requirements.
- To prevent fraud and abuse.
- To provide government-mandated benefits.

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

Personal Detail Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

- To provide employment.
- To provide benefits.
- 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.

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

Personal Health Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

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

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

Sensitive Personal Information

(Cal. Civ. Code § 1798.80(e))

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

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

- To prevent fraud and abuse.

We collect and process your Sensitive Personal Information 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.
- 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.

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

Travel and Expense Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Customer records information
- Commercial information
- Geolocation data
- Inferences

Expense details, travel booking details, travel history

We collect and process your Travel and Expense Information for the following purposes:

- To reimburse your travel expenses.
- To track your travel expenses.
- To ensure you are complying with company travel policies.
- To improve our travel and expense management processes.
- To comply with legal requirements.

No Travel and Expense Information is collected from you.

User Account Information

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Customer records information

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

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

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

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

(Cal. Civ. Code § 1798.80(e))

- Identifiers
- Customer records information
- Characteristics of protected classifications under California or federal law
- Internet or other electronic network activity information

Bullying and harassment details

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

- To provide you with the benefits to which you are entitled.
- To manage your compensation and benefits.
- To improve our workplace welfare programs.
- To comply with legal requirements.
- To prevent fraud and

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

- Geolocation data
- Audio, electronic, visual, thermal, olfactory, or similar information
- Professional or employment-related information
- Education information
- Inferences

abuse.

Data Category (Event Attendees)

Example Personal Identifiers

Purposes for Collection/ Use

Shared with Third Parties

Sources of Personal Information

Contact Information

(Cal. Civ. Code § 1798.80(e))

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

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

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 comply with legal requirements.
- To prevent fraud and abuse.
- To improve our products and services.

Yes

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

Device Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

(Cal. Civ. Code § 1798.80(e))

- Customer records information
- Identifiers

Name of emergency contact, contact information of emergency contact, relationship to individual, next of kin

We collect and process your Emergency Contact Information to contact your emergency contact in an emergency.

No

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

Family Information

(Cal. Civ. Code § 1798.80(e))

- Customer records information
- Identifiers

Parent's name, dependents, and other household information

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

- To contact your family members in the event of an emergency.

No

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

Government Identifier Information

(Cal. Civ. Code § 1798.80(e))

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

Driver’s license, national identification number, passport number, social security number, national identity card details

We collect and process your Government Identifier Information for the following purposes:

- To verify your identity.
- To comply with legal requirements.
- To prevent fraud and abuse.

No

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

Personal Detail Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

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

No

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

Personal Health Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

- To assist in meal planning.

No

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

Professional Experience and Affiliation Information

(Cal. Civ. Code § 1798.80(e))

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

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, and third parties you have authorized to provide us with your Personal Information.

Social Media Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

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

Yes

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

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

information
 • Inferences

Data Category (Job Applicants)	Example Personal Identifiers	Purposes for Collection/ Use	Shared with Third Parties	Sources of Personal Information
Background Check Information (Cal. Civ. Code § 1798.80(e))	Criminal history, criminal records, driving citations	We collect and process your Background Check Information for the following purposes: <ul style="list-style-type: none"> • To understand your needs and interests. • To prevent fraud and abuse. • To verify your identity and qualifications. • To assess your suitability for the position. • To comply with legal requirements, such as those related to employment law or anti-discrimination law. • To protect the safety and security of our employees and customers. • To prevent fraud and abuse. • To improve our decision-making about hiring, promotion, and other employment-related decisions. 	No	Background Check Information is collected from you and third parties you have authorized to provide us with your Personal Information.
Contact Information (Cal. Civ. Code § 1798.80(e))	Name, postal address, phone number, mailing address, email address, physical location	We collect and process your Contact Information for the following purposes: <ul style="list-style-type: none"> • 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 provide you with customer support. • To comply with legal requirements. • To prevent fraud and abuse. • To improve our products and services. 	Yes	Contact Information is collected from you and may also be collected from other third parties.
Device Information (Cal. Civ. Code § 1798.80(e))	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: <ul style="list-style-type: none"> • 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

(Cal. Civ. Code § 1798.80(e))

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

Academic transcripts, educational degrees, education training and history, languages, letters of recommendation

We collect and process your Education and Skills Information for the following purposes:

- To verify the educational qualifications of job applicants.
- To improve the company’s recruitment and hiring processes.

Education and Skills Information is collected from you.

No We may also collect Education and Skills Information directly from third-party recruiters you are using to find employment which you have authorized to provide us with your Personal Information.

Employment Information

(Cal. Civ. Code § 1798.80(e))

- Customer records information
- Professional or employment-related information
- Audio, electronic, visual, thermal, olfactory, or similar information
- Characteristics of protected classifications under California or federal law
- Inferences

Benefits and entitlements data, company/entity, contract type, hours of work, job title, salary/wage, workers compensation claims, start date, end date, reason for termination, employee performance results, record of absence, time tracking, annual leave, office location, previous work history, grievances and complaints, health and safety-related information and reporting, job application details, disciplinary action, exit interview

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

- To 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.

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

No We may also collect Education and Skills Information directly from third-party recruiters you are using to find employment which you have authorized to provide us with your Personal Information.

Emergency Contact Information

(Cal. Civ. Code § 1798.80(e))

- Customer records information
- Identifiers

Name of emergency contact, contact information of emergency contact, relationship to individual, next of kin

We collect and process your Emergency Contact Information to contact your emergency contact in an emergency.

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

No

Government Identifier Information

(Cal. Civ. Code § 1798.80(e))

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

Driver’s license, national identification number, passport number, social security number, national identity card details

We collect and process your Government Identifier Information for the following purposes:

- To verify your identity.
- To comply with legal requirements.
- To prevent fraud and abuse.

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

No

Personal Detail Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

- To provide employment.
- 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 employment opportunities.
- To market our benefits

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

No

to you.

Personal Health Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

- To assist in meal planning.

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

Professional Experience and Affiliation Information

(Cal. Civ. Code § 1798.80(e))

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

Professional memberships, qualifications, certifications

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

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

No Professional Experience and Affiliation Information is collected from you, your representatives, and third parties you have authorized to provide us with your Personal Information.

Referral Information

(Cal. Civ. Code § 1798.80(e))

- Professional or employment-related information
- Inferences

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

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

- To evaluate your qualifications for employment.
- To contact you about employment opportunities.
- To improve our hiring process.
- To comply with legal requirements.
- To prevent fraud and abuse.

No Referral Information is collected from you, and third parties you have authorized to provide us with your Personal Information. We may also collect your Referral Information from references you list on applications and forms.

Sensitive Personal Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

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

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

Data Category (Office Visitors)

Example Personal Identifiers

Purposes for Collection/ Use

Shared with Third Parties

Sources of Personal Information

<p>Contact Information</p> <p>(Cal. Civ. Code § 1798.80(e))</p>	<p>Name, postal address, phone number, mailing address, email address, physical location</p>	<p>We collect and process your Contact Information for the following purposes:</p> <ul style="list-style-type: none"> • 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. 	<p>Yes Contact Information is collected from you and may also be collected from other third parties.</p>
<p>Device Information</p> <p>(Cal. Civ. Code § 1798.80(e))</p>	<p>Device type and operating system, device unique identifier, IP address, audio, video, device fingerprints</p>	<p>We collect and process your Device Information for the following purposes:</p> <ul style="list-style-type: none"> • To provide you with our products and services. • To protect our systems and networks. • To protect our users. • To comply with legal requirements. 	<p>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.</p>
<p>Emergency Contact Information</p> <p>(Cal. Civ. Code § 1798.80(e))</p>	<p>Name of emergency contact, contact information of emergency contact, relationship to individual, next of kin</p>	<p>We collect and process your Emergency Contact Information to contact your emergency contact in an emergency.</p>	<p>No Emergency Contact Information is collected from you or your representatives you have authorized to provide us with your Personal Information.</p>
<p>Government Identifier Information</p> <p>(Cal. Civ. Code § 1798.80(e))</p>	<p>Driver's license, national identification number, passport number, social security number, national identity card details</p>	<p>We collect and process your Government Identifier Information for the following purposes:</p> <ul style="list-style-type: none"> • To verify your identity. • To comply with legal requirements. • To prevent fraud and abuse. 	<p>No Government Identifier Information is collected from you or your representatives you have authorized to provide us with your Personal Information.</p>
<p>Personal Detail Information</p> <p>(Cal. Civ. Code § 1798.80(e))</p>	<p>Age, gender, date of birth, marital status, nationality, signature</p>	<p>We collect and process your Personal Detail Information for the following purposes:</p> <ul style="list-style-type: none"> • 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. 	<p>No Personal Detail Information is collected from you and third parties you have authorized to provide us with your Personal Information.</p>

Personal Health Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

- To provide you with our products and services.
- To assist in meal planning.

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

Data Category (Prospective Clients)

Example Personal Identifiers

Purposes for Collection/ Use

Shared with Third Parties

Sources of Personal Information

Background Check Information

(Cal. Civ. Code § 1798.80(e))

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

Criminal history, criminal records, driving citations

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 laundering or know-your-customer laws.
- To prevent fraud and abuse.
- To improve our decision-making about marketing and sales.

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

Contact Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

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

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

Device Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

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

Device Information is collected from you, other third parties or subscribers. Yes We may also collect your Device Information automatically through our use of cookies and other data collection technologies on our sites.

Emergency Contact Information	(Cal. Civ. Code § 1798.80(e)) <ul style="list-style-type: none"> Customer records information Identifiers 	Name of emergency contact, contact information of emergency contact, relationship to individual, next of kin	We collect and process your Emergency Contact Information to contact your emergency contact in an emergency.	No	Emergency Contact Information is collected from you or your representatives you have authorized to provide us with your Personal Information.
Government Identifier Information	(Cal. Civ. Code § 1798.80(e)) <ul style="list-style-type: none"> Identifiers Customer records information Characteristics of protected classifications under California or federal law 	Driver's license, national identification number, passport number, social security number, national identity card details	We collect and process your Government Identifier Information for the following purposes: <ul style="list-style-type: none"> To verify your identity. To comply with legal requirements. To prevent fraud and abuse. 	No	Government Identifier Information is collected from you or your representatives you have authorized to provide us with your Personal Information.
Personal Detail Information	(Cal. Civ. Code § 1798.80(e)) <ul style="list-style-type: none"> Identifiers Customer records information Characteristics of protected classifications under California or federal law 	Age, gender, date of birth, marital status, nationality, signature	We collect and process your Personal Detail Information for the following purposes: <ul style="list-style-type: none"> To provide products and services that you have requested. To provide information that you have requested. To provide event registration. To improve our products and services. To improve our events. To comply with legal requirements. To prevent fraud and abuse. To market our products and services. 	No	Personal Detail Information is collected from you and third parties you have authorized to provide us with your Personal Information.
Personal Health Information	(Cal. Civ. Code § 1798.80(e)) <ul style="list-style-type: none"> Identifiers Customer records information Characteristics of protected classifications under California or federal law 	Information related to medical payment, medical claims data, medical history, products, or equipment used, health plan beneficiary, medical treatment	We collect and process your Personal Health Information for the following purposes: <ul style="list-style-type: none"> To assist in meal planning. 	No	Personal Health Information is collected from you or your representatives you have authorized to provide us with your Personal Information.
Professional Experience and Affiliation Information	(Cal. Civ. Code § 1798.80(e)) <ul style="list-style-type: none"> Customer records information Education information Professional or employment-related information Inferences 	Professional memberships, qualifications, certifications	We collect and process your Professional Experience and Affiliation Information for the following purposes: <ul style="list-style-type: none"> To improve our products and services. To comply with legal requirements. To market our products and services to you. To prevent fraud and abuse. 	No	Professional Experience and Affiliation Information is collected from you, your representatives, and third parties you have authorized to provide us with your Personal Information.
Social Media Information	(Cal. Civ. Code § 1798.80(e)) <ul style="list-style-type: none"> Identifiers Customer records information Commercial information Internet or other electronic network 	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: <ul style="list-style-type: none"> To market our products and services to you. To improve our products and services. To comply with legal requirements. 	No	Social Media Information is collected from you, your clients, or your representatives you have authorized to provide us with your Personal Information. We may also collect your Social Media Information from third-party sources, such as social media platforms (if you interact with us through your social media account), cookies and other data collection technologies on our

- activity information
- Geolocation data
- Audio, electronic, visual, thermal, olfactory, or similar information
- Professional or employment-related information
- Inferences

sites.

Data Category (Subscribers)

Example Personal Identifiers

Purposes for Collection/ Use

Shared with Third Parties

Sources of Personal Information

Contact Information

(Cal. Civ. Code § 1798.80(e))

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

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

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 comply with legal requirements.
- To prevent fraud and abuse.
- To improve our products and services.

Yes

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

Device Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

(Cal. Civ. Code § 1798.80(e))

- Customer records information
- Identifiers

Name of emergency contact, contact information of emergency contact, relationship to individual, next of kin

We collect and process your Emergency Contact Information to contact your emergency contact in an emergency.

No

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

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

Personal Detail Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

No

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

Social Media Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

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

No

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

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

Data Category (Third Parties)

Example Personal Identifiers

Purposes for Collection/ Use

Shared with Third Parties

Sources of Personal Information

Contact Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

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

Device Information

(Cal. Civ. Code § 1798.80(e))

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

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

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	(Cal. Civ. Code § 1798.80(e))	<ul style="list-style-type: none"> • Customer records information • Identifiers 	Name of emergency contact, contact information of emergency contact, relationship to individual, next of kin	We collect and process your Emergency Contact Information to contact your emergency contact in an emergency.	No	Emergency Contact Information is collected from you or your representatives you have authorized to provide us with your Personal Information.
Financial Detail Information	(Cal. Civ. Code § 1798.80(e))	<ul style="list-style-type: none"> • Identifiers • Customer records information • Commercial information 	Bank account information, bank statements, compensation data, and other financial-related details such as income, investments, benefits, tax status	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 Information.
Government Identifier Information	(Cal. Civ. Code § 1798.80(e))	<ul style="list-style-type: none"> • Identifiers • Customer records information • Characteristics of protected classifications under California or federal law 	Driver's license, national identification number, passport number, social security number, national identity card details	We collect and process your Government Identifier Information for the following purposes:	No	Government Identifier Information is collected from you or your representatives you have authorized to provide us with your Personal Information.
Personal Detail Information	(Cal. Civ. Code § 1798.80(e))	<ul style="list-style-type: none"> • Identifiers • Customer records information • Characteristics of protected classifications under California or federal law 	Age, gender, date of birth, marital status, nationality, signature	We collect and process your Personal Detail Information for the following purposes:	No	Personal Detail Information is collected from you and third parties you have authorized to provide us with your Personal Information.
Personal Health Information	(Cal. Civ. Code § 1798.80(e))	<ul style="list-style-type: none"> • Identifiers • Customer records information • Characteristics of protected classifications under California or federal law 	Information related to medical payment, medical claims data, medical history, products, or equipment used, health plan beneficiary, medical treatment	We collect and process your Personal Health Information for the following purposes:	No	Personal Health Information is collected from you or your representatives you have authorized to provide us with your Personal Information.
Referral Information	(Cal. Civ. Code § 1798.80(e))	<ul style="list-style-type: none"> • Professional or employment-related information • Inferences 	Name of referral, contact information of referral, relationship of referral	We collect and process your Referral Information for the following purposes:	No	Referral Information is collected from you, and third parties you have authorized to provide us with your Personal Information. We may also collect your Referral Information from references you list on applications and forms.

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

Sensitive Personal Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

- To comply with legal requirements such as 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.

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

Workplace Welfare Information

(Cal. Civ. Code § 1798.80(e))

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

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.

Data Category (Website Users)

Example Personal Identifiers

Purposes for Collection/ Use

Shared with Third Parties

Sources of Personal Information

Browsing Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

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.

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

- requirements.
- To improve the security of our website, systems, and services.

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

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

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

Contact Information

(Cal. Civ. Code § 1798.80(e))

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

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

Device Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

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

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

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

Sensitive Personal Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

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

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

Social Media Information

(Cal. Civ. Code § 1798.80(e))

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

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

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

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

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

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

Browsing and Device Information

Like many companies, your visit to our website triggers automatic collection of cookies and other tracking technologies. We and third parties, including our third-party service providers may automatically collect certain details about your device and browsing, like IP address, browser type, and page views through the use of cookies and other tracking tools like analytics and pixels. This information may be used to understand your interests and needs, improve the performance of our marketing campaigns, 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 Information from Children under the age of 16 without prior verifiable parental consent.

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

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

Categories of Third Parties with Whom Personal Information Is Potentially Disclosed

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

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

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

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

- **Google Analytics**

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

- **Sitecore**

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

- **Demandbase**

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

- **Cookies and Other Tracking Technologies**

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

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

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

Third-Party Links and Services

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

Do Not Track/Global Privacy Control (GPC)

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

Retention

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

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

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

Clients	We retain the personal information processed by us for as long as is considered necessary for the purpose(s) for which it was collected. Personal information may be held for longer periods where extended retention periods are required by law, regulation, or professional standards and to establish, exercise or defend our legal rights.
Contractors	Personal information will be retained about our contacts at our contractors, for as long as it is necessary for the purposes set out above (e.g., for as long as we have, or need to keep a record of, a relationship with a contact, which is for the duration of our relationship with a contact or their organization). Personal information may be held for longer periods where extended retention periods are required by law, regulation, or professional standards and to establish, exercise or defend our legal rights.
Corporate (Prospective Corporate Acquisition)	We retain the personal information processed by us in accordance with the terms of our Corporate agreements.
Employees	We retain the personal information processed by us for as long as is considered necessary for the purpose(s) for which it was collected. Personal information may be held for longer periods where extended retention periods are required by law, regulation, or professional standards and to establish, exercise or defend our legal rights.
Event Attendees	We retain the personal information processed by us for as long as is considered necessary for the purpose(s) for which it was collected. Personal information may be held for longer periods where extended retention periods are required by law, regulation, or professional standards and to establish, exercise or defend our legal rights.
Job Applicants	We retain the personal information processed by us for as long as is considered necessary for the purpose(s) for which it was collected. Personal information may be held for longer periods where extended retention periods are required by law, regulation, or professional standards and to establish, exercise or defend our legal rights.
Office Visitors	We retain the personal information processed by us for as long as is considered necessary for the purpose(s) for which it was collected. Personal information may be held for longer periods where extended retention periods are required by law, regulation, or professional standards and to establish, exercise or defend our legal rights.
Prospective Clients	Personal information will be retained in the Citrin Cooperman's CRM for as long as we have, or need to keep a record of, a relationship with a business contact. Personal information may be held for longer periods where extended retention periods are required by law, regulation, or professional standards and to establish, exercise or defend our legal rights.
Subscribers	Personal information will be retained in the Citrin Cooperman's CRM for as long as we have, or need to keep a record of, a relationship with a business contact. Personal information may be held for longer periods where extended retention periods are required by law, regulation, or professional standards and to establish, exercise or defend our legal rights.
Third Parties	Personal information will be retained about our contacts at our suppliers for as long as it is necessary for the purposes set out adjacent (e.g., for as long as we have, or need to keep a record of, a relationship with a contact, which is for the duration of our relationship with a contact or their organization). Personal information may be held for longer periods where extended retention periods are required by law, regulation, or professional standards and to establish, exercise or defend our legal rights.
Website Users	We will retain the personal information collected by us through the Site for as long as is necessary for the purpose(s) for which it was collected as set out above, provided that personal information may be held for longer periods where extended retention periods are required by law, regulation, or professional standards, and in order to establish, exercise or defend our legal rights.

[Please see Cookies and Other Tracking Technology](#)

Your Data Protection Rights

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

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

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

Automated Decision Making

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

Exercising Your Data Protection Rights

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

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

Your request must:

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

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

Anti-discrimination

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

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

Enforcement and Dispute Resolution

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

Shine the Light

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

Changes to This Notice

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

[View the full Citrin Cooperman Privacy Notice](#)

Accessible Format

This Privacy Notice is available to individuals with disabilities. To access this Privacy Notice in an alternative downloaded format, please [click here](#).