

# **Privacy Notice**

## **Virginia 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 Data when you interact with us as a subscriber, client, prospective client, office visitor, website user, job applicant, employee, contractor, supplier, event attendee, or any other relevant individual, and describes the choices you have relating to your Personal Data and how to exercise such rights.

## Applicability

This Privacy Notice supplements the [Citrin Cooperman Privacy Notice](#) and addresses state-specific disclosures required under the Virginia Consumer Data Protection Act (“VCDPA”). If you are a California resident, please see our [California Privacy Notice](#).

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

For purposes of this Privacy Notice, “Personal Data”, means any information that is linked or reasonably linkable to an identified or identifiable natural person. "Personal data" does not include de-identified data or publicly available information.

Additionally, “Sensitive Personal Data” is a subset of Personal Data that requires heightened protection. Examples include and are not limited to Information on Children, Background Check Information, Financial Detail Information, Employment Information such as citizenship, Personal Details such as gender, ethnicity, emails or post mail, racial origin, race, political affiliations, religious affiliation or beliefs, call recordings, Government Identifiers such as SSN, Personal Health Information, Contact Information such as physical address or Browsing Information such as precise geolocation (able to identify the location of an individual within 1,750 ft).

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

## Your Personal Data

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

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

We process your Personal Data for the following purposes:

To provide products and services to you

To comply with legal/regulatory requirements

To operate and improve our business

To manage our workforce and provide them with employment, training, compensation, or benefits

For marketing and advertising purposes

To improve the security and performance of our website, network, systems and services

To protect against fraud and abuse

To protect the safety and security of our employees and clients

To communicate with you about our products and services

To operate and understand your use of our website

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

## Type of Personal Data We Collect

We may collect, process, and share the following information:

Data Category (Client Representatives)	Example Personal Identifiers	Purposes for Collection/Use	Shared with Third Parties
Browsing Information	Browsing time, cookie information, IP address, web beacons, device fingerprinting, unprecise 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	<p>We collect and process your Browsing Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To understand your interests and needs.</li> <li>• To improve the performance of our marketing campaigns.</li> <li>• To improve the performance of our website.</li> <li>• To personalize the content and advertising that we show to users.</li> <li>• To prevent fraud and abuse.</li> <li>• To comply with legal requirements.</li> <li>• To improve the security of our website, systems, and services.</li> </ul>	Yes
Contact Information	Name, postal address, phone number, mailing address, email address, physical location	<p>We collect and process your Contact Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To market our products and services.</li> <li>• To send you marketing materials.</li> <li>• To verify your identity.</li> <li>• To identify potential clients.</li> <li>• To communicate with you about our products and services.</li> <li>• To contact you about your account.</li> <li>• To improve our security.</li> <li>• To improve our events.</li> <li>• To invite you to our events or webinars.</li> <li>• To fulfill our contractual obligations to you.</li> <li>• To provide you with customer support.</li> <li>• To process payments.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> <li>• To improve our products and services.</li> </ul>	Yes
Device Information	Device type and operating system, device unique identifier, IP address, audio, video, device fingerprints	<p>We collect and process your Device Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To provide you with our products and services.</li> <li>• To improve our products and services that you have requested.</li> <li>• To protect our systems and networks.</li> <li>• To protect our users.</li> <li>• To comply with legal requirements.</li> <li>• To market our products and services to you.</li> </ul>	Yes
Family Information	Parent's name, dependents, and other household information	<p>We collect and process your Family Information for the following purposes:</p>	No

		<ul style="list-style-type: none"> <li>• To provide you with the products and services that you have requested.</li> <li>• To improve our products and services.</li> <li>• To contact your family members in the event of an emergency.</li> </ul>	
Financial Detail Information	Bank account information, bank statements, compensation data, and other financial-related details such as income, investments, benefits, tax status	<p>We collect and process your Financial Detail Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To process payments.</li> <li>• To verify your identity.</li> <li>• To conduct due diligence.</li> <li>• To protect our interests.</li> <li>• To negotiate acquisitions.</li> <li>• To provide you with the financial products and services that you have requested.</li> <li>• To comply with legal requirements.</li> <li>• To protect against fraud and abuse.</li> </ul>	No
Government Identifier Information	Driver's license, national identification number, passport number, social security number, national identity card details	<p>We collect and process your Government Identifier Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To verify your identity.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> </ul>	No
Personal Detail Information	Age, gender, date of birth, marital status, nationality, signature	<p>We collect and process your Personal Detail Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To provide products and services that you have requested.</li> <li>• To provide information that you have requested.</li> <li>• To provide event registration.</li> <li>• To improve our products and services.</li> <li>• To improve our events.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> <li>• To market our products and services.</li> </ul>	Yes
Personal Health Information	Information related to medical payment, medical claims data, medical history, products, or equipment used, health plan beneficiary, medical treatment	<p>We collect and process your Personal Health Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To assist in meal planning.</li> </ul>	No
Professional Experience and Affiliation Information	Professional memberships, qualifications, certifications	<p>We collect and process your Professional Experience and Affiliation Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To provide you with the products and services that you have requested.</li> <li>• To improve our products and services.</li> <li>• To comply with legal requirements.</li> <li>• To market our products and services to you.</li> <li>• To prevent fraud and abuse.</li> </ul>	No
Sensitive Data	Race, ethnic origin, physical or mental health, religious beliefs, citizenship or immigration status, sexual orientation, genetic or biometric data, precise location (within 1750 ft), any data collected on a "known child"	<p>We collect and process your Sensitive Data for the following purposes:</p> <ul style="list-style-type: none"> <li>• To provide you with the products and services you have requested.</li> </ul>	No

		<ul style="list-style-type: none"> <li>• To improve our products and services.</li> <li>• To comply with legal requirements such as anti-discrimination laws.</li> <li>• To protect the safety of employees or others.</li> <li>• To prevent fraud and abuse.</li> <li>• With your consent, to market our products and services to you.</li> </ul>	
Social Media Information	Social media accounts, social media content, social media history, profile information, posts, connections, likes, shares, comments, interactions, behavioral data, technical data	<p>We collect and process your Social Media Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To market our products and services to you.</li> <li>• To improve our products and services.</li> <li>• To comply with legal requirements.</li> </ul>	Yes
User Account Information	Account age, account number, email address or username, account password	<p>We collect and process your User Account Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To create and manage your account.</li> <li>• To provide you with access to our products and services.</li> <li>• To protect your account from unauthorized access.</li> <li>• To improve our products and services.</li> <li>• To comply with legal requirements.</li> </ul>	No

Data Category (Client Representatives)	Example Personal Identifiers	Purposes for Collection/Use	Shared with Third Parties
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Browsing Information	Browsing time, cookie information, IP address, web beacons, device fingerprinting, unprecise 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	<p>We collect and process your Browsing Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To understand your interests and needs.</li> <li>• To improve the performance of our marketing campaigns.</li> <li>• To improve the performance of our website.</li> <li>• To personalize the content and advertising that we show to users.</li> <li>• To prevent fraud and abuse.</li> <li>• To comply with legal requirements.</li> <li>• To improve the security of our website, systems, and services.</li> </ul>	Yes
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Contact Information	Name, postal address, phone number, mailing address, email address, physical location	<p>We collect and process your Contact Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To market our products and services.</li> <li>• To send you marketing materials.</li> <li>• To verify your identity.</li> <li>• To identify potential clients.</li> <li>• To communicate with you about our products and services.</li> <li>• To contact you about your account.</li> <li>• To improve our security.</li> <li>• To improve our events.</li> <li>• To invite you to our events or webinars.</li> </ul>	Yes
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		<ul style="list-style-type: none"> <li>• To fulfill our contractual obligations to you.</li> <li>• To provide you with customer support.</li> <li>• To process payments.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> <li>• To improve our products and services.</li> </ul>	
Device Information	Device type and operating system, device unique identifier, IP address, audio, video, device fingerprints	<p>We collect and process your Device Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To provide you with our products and services.</li> <li>• To improve our products and services that you have requested.</li> <li>• To protect our systems and networks.</li> <li>• To protect our users.</li> <li>• To comply with legal requirements.</li> <li>• To market our products and services to you.</li> </ul>	Yes
Family Information	Parent's name, dependents, and other household information	<p>We collect and process your Family Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To provide you with the products and services that you have requested.</li> <li>• To improve our products and services.</li> <li>• To contact your family members in the event of an emergency.</li> </ul>	No
Financial Detail Information	Bank account information, bank statements, compensation data, and other financial-related details such as income, investments, benefits, tax status	<p>We collect and process your Financial Detail Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To process payments.</li> <li>• To verify your identity.</li> <li>• To conduct due diligence.</li> <li>• To protect our interests.</li> <li>• To negotiate acquisitions.</li> <li>• To provide you with the financial products and services that you have requested.</li> <li>• To comply with legal requirements.</li> <li>• To protect against fraud and abuse.</li> </ul>	No
Government Identifier Information	Driver's license, national identification number, passport number, social security number, national identity card details	<p>We collect and process your Government Identifier Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To verify your identity.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> </ul>	No
Personal Detail Information	Age, gender, date of birth, marital status, nationality, signature	<p>We collect and process your Personal Detail Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To provide products and services that you have requested.</li> <li>• To provide information that you have requested.</li> <li>• To provide event registration.</li> <li>• To improve our products and services.</li> </ul>	Yes

		<ul style="list-style-type: none"> <li>• To improve our events.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> <li>• To market our products and services.</li> </ul>	
Personal Health Information	Information related to medical payment, medical claims data, medical history, products, or equipment used, health plan beneficiary, medical treatment	<p>We collect and process your Personal Health Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To assist in meal planning.</li> </ul>	No
Professional Experience and Affiliation Information	Professional memberships, qualifications, certifications	<p>We collect and process your Professional Experience and Affiliation Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To provide you with the products and services that you have requested.</li> <li>• To improve our products and services.</li> <li>• To comply with legal requirements.</li> <li>• To market our products and services to you.</li> <li>• To prevent fraud and abuse.</li> </ul>	No
Sensitive Data	Race, ethnic origin, physical or mental health, religious beliefs, citizenship or immigration status, sexual orientation, genetic or biometric data, precise location (within 1750 ft), any data collected on a “known child”	<p>We collect and process your Sensitive Data for the following purposes:</p> <ul style="list-style-type: none"> <li>• To provide you with the products and services you have requested.</li> <li>• To improve our products and services.</li> <li>• To comply with legal requirements such as anti-discrimination laws.</li> <li>• To protect the safety of employees or others.</li> <li>• To prevent fraud and abuse.</li> <li>• With your consent, to market our products and services to you.</li> </ul>	No
Social Media Information	Social media accounts, social media content, social media history, profile information, posts, connections, likes, shares, comments, interactions, behavioral data, technical data	<p>We collect and process your Social Media Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To market our products and services to you.</li> <li>• To improve our products and services.</li> <li>• To comply with legal requirements.</li> </ul>	Yes
User Account Information	Account age, account number, email address or username, account password	<p>We collect and process your User Account Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To create and manage your account.</li> <li>• To provide you with access to our products and services.</li> <li>• To protect your account from unauthorized access.</li> <li>• To improve our products and services.</li> <li>• To comply with legal requirements.</li> </ul>	No

<b>Data Category (Clients)</b>	<b>Example Personal Identifiers</b>	<b>Purposes for Collection/Use</b>	<b>Shared with Third Parties</b>
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Authenticating Information	Passwords, PIN, mother’s maiden name	<p>We collect and process your Authenticating Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To authenticate your identity and grant you access to our services or systems.</li> </ul>	No
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		<ul style="list-style-type: none"> <li>• To prevent fraud and abuse.</li> <li>• To comply with legal requirements, such as those related to financial services or healthcare.</li> <li>• To improve the security of our systems and services.</li> <li>• To improve your customer experience.</li> </ul>	
Beneficiary Contact Information	Name of beneficiary contact, telephone number of beneficiary contact, address of beneficiary contact, relationship to individual	<p>We collect and process your Beneficiary Contact Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To contact your beneficiary in the event of your death.</li> <li>• To provide information about benefits to your beneficiary.</li> <li>• To comply with legal requirements, such as those related to employment law or tax law.</li> <li>• To protect the privacy of your beneficiary contact information.</li> </ul>	No
Background Check Information	Criminal history, criminal records, driving citations	<p>We collect and process your Background Check Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To understand your needs and interests.</li> <li>• To assess your suitability for our products or services.</li> <li>• To comply with legal requirements, such as those related to anti-money laundering or know-your-customer laws.</li> <li>• To prevent fraud and abuse.</li> <li>• To improve our decision-making about marketing and sales.</li> </ul>	No
Browsing Information	Browsing time, cookie information, IP address, web beacons, device fingerprinting, unprecise 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	<p>We collect and process your Browsing Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To understand your interests and needs.</li> <li>• To improve the performance of our marketing campaigns.</li> <li>• To improve the performance of our website.</li> <li>• To personalize the content and advertising that we show to users.</li> <li>• To prevent fraud and abuse.</li> <li>• To comply with legal requirements.</li> <li>• To improve the security of our website, systems, and services.</li> </ul>	Yes
Children Information	Names of children, age or gender of children, birth date, address of children, activities associated with children	<p>We collect and process Clients' Children Information only with the consent of a parent or guardian for the following purposes:</p> <ul style="list-style-type: none"> <li>• To perform services and fulfill our contractual obligations to you.</li> <li>• To comply with our legal obligation to protect the privacy of children.</li> </ul>	No
Contact Information	Name, postal address, phone number, mailing address, email address, physical location	<p>We collect and process your Contact Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To market our products and services.</li> <li>• To send you marketing materials.</li> <li>• To verify your identity.</li> <li>• To communicate with you about our products and services.</li> <li>• To contact you about your account.</li> </ul>	Yes



		<ul style="list-style-type: none"> <li>• To improve our security.</li> <li>• To improve our events.</li> <li>• To invite you to our events or webinars.</li> <li>• To fulfill our contractual obligations to you.</li> <li>• To provide you with customer support.</li> <li>• To process payments.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> <li>• To improve our products and services.</li> </ul>	
Device Information	Device type and operating system, device unique identifier, IP address, audio, video, device fingerprints	<p>We collect and process your Device Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To provide you with our products and services.</li> <li>• To improve our products and services that you have requested.</li> <li>• To protect our systems and networks.</li> <li>• To protect our users.</li> <li>• To comply with legal requirements.</li> <li>• To market our products and services to you.</li> </ul>	Yes
Emergency Contact Information	Name of emergency contact, contact information of emergency contact, relationship to individual, next of kin	We collect and process your Emergency Contact Information to contact your emergency contact in an emergency.	No
Family Information	Parent's name, dependents, and other household information	<p>We collect and process your Family Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To provide you with the products and services that you have requested.</li> <li>• To improve our products and services.</li> <li>• To contact your family members in the event of an emergency.</li> </ul>	No
Financial Detail Information	Bank account information, bank statements, compensation data, and other financial-related details such as income, investments, benefits, tax status	<p>We collect and process your Financial Detail Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To process payments.</li> <li>• To verify your identity.</li> <li>• To conduct due diligence.</li> <li>• To protect our interests.</li> <li>• To negotiate acquisitions.</li> <li>• To provide you with the financial products and services that you have requested.</li> <li>• To comply with legal requirements.</li> <li>• To protect against fraud and abuse.</li> </ul>	No
Government Identifier Information	Driver's license, national identification number, passport number, social security number, national identity card details	<p>We collect and process your Government Identifier Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To verify your identity.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> </ul>	No
Personal Detail Information	Age, gender, date of birth, marital status, nationality, signature	<p>We collect and process your Personal Detail Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To provide products and services that you have requested.</li> <li>• To provide information that you have requested.</li> <li>• To provide event registration.</li> </ul>	Yes

		<ul style="list-style-type: none"> <li>• To improve our products and services.</li> <li>• To improve our events.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> <li>• To market our products and services.</li> </ul>	
Personal Health Information	Information related to medical payment, medical claims data, medical history, products, or equipment used, health plan beneficiary, medical treatment	<p>We collect and process your Personal Health Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To provide you with our products and services.</li> <li>• To assist in meal planning.</li> <li>• To improve our products and services.</li> <li>• To improve our benefits.</li> <li>• To communicate with healthcare providers.</li> <li>• To comply with regulatory requirements.</li> <li>• To prevent fraud and abuse.</li> </ul>	No
Professional Experience and Affiliation Information	Professional memberships, qualifications, certifications	<p>We collect and process your Professional Experience and Affiliation Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To provide you with the products and services that you have requested.</li> <li>• To improve our products and services.</li> <li>• To comply with legal requirements.</li> <li>• To market our products and services to you.</li> <li>• To prevent fraud and abuse.</li> </ul>	No
Sensitive Data	Race, ethnic origin, physical or mental health, religious beliefs, citizenship or immigration status, sexual orientation, genetic or biometric data, precise location (within 1750 ft), any data collected on a “known child”	<p>We collect and process your Sensitive Data for the following purposes:</p> <ul style="list-style-type: none"> <li>• To provide you with the products and services you have requested.</li> <li>• To improve our products and services.</li> <li>• To comply with legal requirements such as anti-discrimination laws.</li> <li>• To protect the safety of employees or others.</li> <li>• To prevent fraud and abuse.</li> <li>• With your consent, to market our products and services to you.</li> <li>• To improve our benefits.</li> <li>• To provide you with benefits.</li> <li>• To communicate with healthcare providers.</li> </ul>	No
Social Media Information	Social media accounts, social media content, social media history, profile information, posts, connections, likes, shares, comments, interactions, behavioral data, technical data	<p>We collect and process your Social Media Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To understand your interests and preferences.</li> <li>• To personalize your experience.</li> <li>• To market our products and services to you.</li> <li>• To improve our products and services.</li> <li>• To comply with legal requirements.</li> </ul>	Yes
User Account Information	Account age, account number, email address or username, account password	<p>We collect and process your User Account Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To create and manage your account.</li> </ul>	No

		<ul style="list-style-type: none"> <li>• To provide you with access to our products and services.</li> <li>• To protect your account from unauthorized access.</li> <li>• To improve our products and services.</li> <li>• To comply with legal requirements.</li> </ul>	
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Data Category (Contractors)	Example Personal Identifiers	Purposes for Collection/Use	Shared with Third Parties
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Authenticating Information	Passwords, PIN, mother's maiden name	<p>We collect and process your Authenticating Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To authenticate your identity and grant you access to our services or systems.</li> <li>• To prevent fraud and abuse.</li> <li>• To comply with legal requirements, such as those related to financial services or healthcare.</li> <li>• To improve the security of our systems and services.</li> </ul>	No
Background Check Information	Criminal history, criminal records, driving citations	<p>We collect and process your Background Check Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To prevent fraud and abuse.</li> </ul>	No
Contact Information	Name, postal address, phone number, mailing address, email address, physical location	<p>We collect and process your Contact Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To verify your identity.</li> <li>• To communicate with you about our products and services.</li> <li>• To contact you about your account.</li> <li>• To improve our security.</li> <li>• To improve our events.</li> <li>• To invite you to our events or webinars.</li> <li>• To fulfill our contractual obligations to you.</li> <li>• To provide you with customer support.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> <li>• To improve our products and services.</li> </ul>	Yes
Device Information	Device type and operating system, device unique identifier, IP address, audio, video, device fingerprints	<p>We collect and process your Device Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To provide you with our products and services.</li> <li>• To protect our systems and networks.</li> <li>• To protect our users.</li> <li>• To comply with legal requirements.</li> </ul>	Yes
Emergency Contact Information	Name of emergency contact, contact information of emergency contact, relationship to individual, next of kin	<p>We collect and process your Emergency Contact Information to contact your emergency contact in an emergency.</p>	No
Family Information	Parent's name, dependents, and other household information	<p>We collect and process your Family Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To contact your family members in the event of an emergency.</li> </ul>	No
Financial Detail Information	Bank account information, bank statements, compensation data, and other financial-related details such as income, investments, benefits, tax status	<p>We collect and process your Financial Detail Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To process payments.</li> <li>• To verify your identity.</li> <li>• To protect our interests.</li> </ul>	No

		<ul style="list-style-type: none"> <li>• To provide you with the financial products and services that you have requested.</li> <li>• To comply with legal requirements.</li> <li>• To protect against fraud and abuse.</li> </ul>	
Government Identifier Information	Driver's license, national identification number, passport number, social security number, national identity card details	<p>We collect and process your Government Identifier Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To verify your identity.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> </ul>	No
Personal Detail Information	Age, gender, date of birth, marital status, nationality, signature	<p>We collect and process your Personal Detail Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To provide information that you have requested.</li> <li>• To provide event registration.</li> <li>• To improve our products and services.</li> <li>• To improve our events.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> </ul>	Yes
Personal Health Information	Information related to medical payment, medical claims data, medical history, products, or equipment used, health plan beneficiary, medical treatment	<p>We collect and process your Personal Health Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To assist in meal planning.</li> </ul>	No
Professional Experience and Affiliation Information	Professional memberships, qualifications, certifications	<p>We collect and process your Professional Experience and Affiliation Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To evaluate your qualifications for employment.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> </ul>	No
Referral Information	Name of referral, contact information of referral, relationship of referral	<p>We collect and process your Referral Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To evaluate your qualifications for employment.</li> <li>• To contact you about employment opportunities.</li> <li>• To improve our hiring process.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> </ul>	No
Sensitive Data	Race, ethnic origin, physical or mental health, religious beliefs, citizenship or immigration status, sexual orientation, genetic or biometric data, precise location (within 1750 ft), any data collected on a "known child"	<p>We collect and process your Sensitive Data for the following purposes:</p> <ul style="list-style-type: none"> <li>• To comply with legal requirements such as anti-discrimination laws.</li> <li>• To protect the safety of employees or others.</li> <li>• To conduct research on the effectiveness of training programs or the impact of diversity in the workplace.</li> <li>• To prevent fraud and abuse.</li> </ul>	No
Travel and Expense Information	Expense details, travel booking details, travel history	<p>We collect and process your Travel and Expense Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To reimburse your travel expenses.</li> <li>• To track your travel expenses.</li> <li>• To ensure you are complying with company travel policies.</li> <li>• To improve our travel and expense management processes.</li> </ul>	No

		<ul style="list-style-type: none"> <li>To comply with legal requirements.</li> </ul>	
Workplace Welfare Information	Bullying and harassment details	<p>We collect and process your Workplace Welfare Information for the following purposes:</p> <ul style="list-style-type: none"> <li>To improve our workplace welfare programs.</li> <li>To comply with legal requirements.</li> <li>To prevent fraud and abuse.</li> </ul>	No

Data Category Corporate (Prospective Corporate Acquisition)	Example Personal Identifiers	Purposes for Collection/ Use	Shared with Third Parties
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Contact Information	Name, postal address, phone number, mailing address, email address, physical location	<p>We collect and process your Contact Information for the following purposes:</p> <ul style="list-style-type: none"> <li>To register you as a new client.</li> <li>To market our products and services.</li> <li>To send you marketing materials.</li> <li>To verify your identity.</li> <li>To identify potential clients.</li> <li>To communicate with you about our products and services.</li> <li>To contact you about your account.</li> <li>To improve our security.</li> <li>To improve our events.</li> <li>To invite you to our events or webinars.</li> <li>To fulfill our contractual obligations to you.</li> <li>To provide you with customer support.</li> <li>To comply with legal requirements.</li> <li>To prevent fraud and abuse.</li> <li>To improve our products and services.</li> </ul>	Yes
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Device Information	Device type and operating system, device unique identifier, IP address, audio, video, device fingerprints	<p>We collect and process your Device Information for the following purposes:</p> <ul style="list-style-type: none"> <li>To protect our systems and networks.</li> <li>To protect our users.</li> <li>To comply with legal requirements.</li> </ul>	Yes
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Financial Detail Information	Bank account information, bank statements, compensation data, and other financial-related details such as income, investments, benefits, tax status	<p>We collect and process your Financial Detail Information for the following purposes:</p> <ul style="list-style-type: none"> <li>To verify your identity.</li> <li>To conduct due diligence.</li> <li>To protect our interests.</li> <li>To negotiate acquisitions.</li> <li>To provide you with the financial products and services that you have requested.</li> <li>To comply with legal requirements.</li> <li>To protect against fraud and abuse.</li> </ul>	No
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Government Identifier Information	Driver's license, national identification number, passport number, social security number, national identity card details	<p>We collect and process your Government Identifier Information for the following purposes:</p> <ul style="list-style-type: none"> <li>To verify your identity.</li> <li>To comply with legal requirements.</li> <li>To prevent fraud and abuse.</li> </ul>	No
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Personal Detail Information	Age, gender, date of birth, marital status, nationality, signature	<p>We collect and process your Personal Detail Information for the following purposes:</p> <ul style="list-style-type: none"> <li>To provide information that you have requested.</li> </ul>	Yes
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		<ul style="list-style-type: none"> <li>• To provide event registration.</li> <li>• To improve our products and services.</li> <li>• To improve our events.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> <li>• To market our products and services.</li> </ul>	
Personal Health Information	Information related to medical payment, medical claims data, medical history, products, or equipment used, health plan beneficiary, medical treatment	<p>We collect and process your Personal Health Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To assist in meal planning.</li> <li>• To comply with regulatory requirements.</li> <li>• To prevent fraud and abuse.</li> </ul>	No

Data Category (Employees)	Example Personal Identifiers	Purposes for Collection/Use	Shared with Third Parties
Authenticating Information	Passwords, PIN, mother's maiden name	<p>We collect and process your Authenticating Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To authenticate your identity and grant you access to our services or systems.</li> <li>• To prevent fraud and abuse.</li> <li>• To comply with legal requirements, such as those related to financial services or healthcare.</li> <li>• To improve the security of our systems and services.</li> </ul>	No
Beneficiary Contact Information	Name of beneficiary contact, telephone number of beneficiary contact, address of beneficiary contact, relationship to individual	<p>We collect and process your Beneficiary Contact Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To contact your beneficiary in the event of your death.</li> <li>• To provide information about benefits to your beneficiary.</li> <li>• To comply with legal requirements, such as those related to employment law or tax law.</li> <li>• To protect the privacy of your beneficiary contact information.</li> </ul>	No
Background Check Information	Criminal history, criminal records, driving citations	<p>We collect and process your Background Check Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To prevent fraud and abuse.</li> <li>• To verify your identity and qualifications.</li> <li>• To assess your suitability for the position.</li> <li>• To comply with legal requirements, such as those related to employment law or anti-discrimination law.</li> <li>• To protect the safety and security of our employees and customers.</li> <li>• To prevent fraud and abuse.</li> <li>• To improve our decision-making about hiring, promotion, and other employment-related decisions.</li> </ul>	No

Children Information	Names of children, age or gender of children, birth date, address of children, activities associated with children	<p>We collect and process Clients' Children Information only with the consent of a parent or guardian for the following purposes:</p> <ul style="list-style-type: none"> <li>• To comply with our legal obligation to protect the privacy of children.</li> <li>• To provide employees with benefits.</li> <li>• To provide employees with services.</li> </ul>	No
Contact Information	Name, postal address, phone number, mailing address, email address, physical location	<p>We collect and process your Contact Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To verify your identity.</li> <li>• To communicate with you about our products and services.</li> <li>• To contact you about your account.</li> <li>• To improve our security.</li> <li>• To improve our events.</li> <li>• To invite you to our events or webinars.</li> <li>• To fulfill our contractual obligations to you.</li> <li>• To provide you with customer support.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> <li>• To improve our products and services.</li> </ul>	Yes
Device Information	Device type and operating system, device unique identifier, IP address, audio, video, device fingerprints	<p>We collect and process your Device Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To provide you with our products and services.</li> <li>• To protect our systems and networks.</li> <li>• To protect our users.</li> <li>• To comply with legal requirements.</li> </ul>	Yes
Education and Skills Information	Academic transcripts, educational degrees, education training and history, languages, letters of recommendation	<p>We collect and process your Education and Skills Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To assess the potential advancement of employees.</li> <li>• To provide training and development opportunities for employees.</li> <li>• To improve the company's recruitment and hiring processes.</li> </ul>	No
Employment Information	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	<p>We collect and process your Employment Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To assess the potential advancement of employees.</li> <li>• To provide training and development opportunities for employees.</li> <li>• To manage our workforce.</li> <li>• To comply with legal</li> </ul>	No

		<p>requirements.</p> <ul style="list-style-type: none"> <li>To provide you with the benefits and services to which you are entitled.</li> </ul>	
Emergency Contact Information	Name of emergency contact, contact information of emergency contact, relationship to individual, next of kin	We collect and process your Emergency Contact Information to contact your emergency contact in an emergency.	No
Family Information	Parent's name, dependents, and other household information	<p>We collect and process your Family Information for the following purposes:</p> <ul style="list-style-type: none"> <li>To contact your family members in the event of an emergency.</li> </ul>	No
Financial Detail Information	Bank account information, bank statements, compensation data, and other financial-related details such as income, investments, benefits, tax status	<p>We collect and process your Financial Detail Information for the following purposes:</p> <ul style="list-style-type: none"> <li>To process payroll.</li> <li>To verify your identity.</li> <li>To conduct due diligence.</li> <li>To protect our interests.</li> <li>To provide you with the financial products and services that you have requested.</li> <li>To comply with legal requirements.</li> <li>To protect against fraud and abuse.</li> </ul>	No
Government Identifier Information	Driver's license, national identification number, passport number, social security number, national identity card details	<p>We collect and process your Government Identifier Information for the following purposes:</p> <ul style="list-style-type: none"> <li>To verify your identity.</li> <li>To comply with legal requirements.</li> <li>To prevent fraud and abuse.</li> <li>To provide government-mandated benefits.</li> </ul>	No
Personal Detail Information	Age, gender, date of birth, marital status, nationality, signature	<p>We collect and process your Personal Detail Information for the following purposes:</p> <ul style="list-style-type: none"> <li>To provide employment.</li> <li>To provide benefits.</li> <li>To provide information that you have requested.</li> <li>To provide event registration.</li> <li>To improve our products and services.</li> <li>To improve our employment practices.</li> <li>To improve our benefits.</li> <li>To provide you with benefits.</li> <li>To improve our events.</li> <li>To comply with legal requirements.</li> <li>To prevent fraud and abuse.</li> <li>To market employment opportunities.</li> <li>To market our benefits to you.</li> </ul>	Yes



Personal Health Information	Information related to medical payment, medical claims data, medical history, products, or equipment used, health plan beneficiary, medical treatment	<p>We collect and process your Personal Health Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To assist in meal planning.</li> <li>• To improve our products and services.</li> <li>• To improve our benefits.</li> <li>• To provide you with benefits.</li> <li>• To communicate with healthcare providers.</li> <li>• To comply with regulatory requirements.</li> <li>• To prevent fraud and abuse.</li> </ul>	No
Sensitive Data	Race, ethnic origin, physical or mental health, religious beliefs, citizenship or immigration status, sexual orientation, genetic or biometric data, precise location (within 1750 ft), any data collected on a “known child”	<p>We collect and process your Sensitive Data for the following purposes:</p> <ul style="list-style-type: none"> <li>• To comply with legal requirements such as anti-discrimination laws.</li> <li>• To protect the safety of employees or others.</li> <li>• To conduct research on the effectiveness of training programs or the impact of diversity in the workplace.</li> <li>• To prevent fraud and abuse.</li> <li>• With your consent, to market our products and services to you.</li> <li>• To improve our benefits.</li> <li>• To provide you with benefits.</li> <li>• To communicate with healthcare providers.</li> </ul>	No
Travel and Expense Information	Expense details, travel booking details, travel history	<p>We collect and process your Travel and Expense Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To reimburse your travel expenses.</li> <li>• To track your travel expenses.</li> <li>• To ensure you are complying with company travel policies.</li> <li>• To improve our travel and expense management processes.</li> <li>• To comply with legal requirements.</li> </ul>	No
User Account Information	Account age, account number, email address or username, account password	<p>We collect and process your User Account Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To create and manage your account.</li> <li>• To provide you with access to our products and services.</li> <li>• To protect your account from unauthorized access.</li> <li>• To improve our products and services.</li> <li>• To comply with legal requirements.</li> </ul>	No
Workplace Welfare Information	Bullying and harassment details	<p>We collect and process your Workplace Welfare Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To provide you with the benefits to which you are entitled.</li> </ul>	No

		<ul style="list-style-type: none"> <li>• To manage your compensation and benefits.</li> <li>• To improve our workplace welfare programs.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> </ul>	
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Data Category (Event Attendees)	Example Personal Identifiers	Purposes for Collection/Use	Shared with Third Parties
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Contact Information	Name, postal address, phone number, mailing address, email address, physical location	<p>We collect and process your Contact Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To market our products and services.</li> <li>• To send you marketing materials.</li> <li>• To verify your identity.</li> <li>• To identify potential clients.</li> <li>• To communicate with you about our products and services.</li> <li>• To contact you about your account.</li> <li>• To improve our security.</li> <li>• To improve our events.</li> <li>• To invite you to our events or webinars.</li> <li>• To fulfill our contractual obligations to you.</li> <li>• To provide you with customer support.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> <li>• To improve our products and services.</li> </ul>	Yes
Device Information	Device type and operating system, device unique identifier, IP address, audio, video, device fingerprints	<p>We collect and process your Device Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To provide you with our products and services.</li> <li>• To protect our systems and networks.</li> <li>• To protect our users.</li> <li>• To comply with legal requirements.</li> </ul>	Yes
Emergency Contact Information	Name of emergency contact, contact information of emergency contact, relationship to individual, next of kin	<p>We collect and process your Emergency Contact Information to contact your emergency contact in an emergency.</p>	No
Family Information	Parent's name, dependents, and other household information	<p>We collect and process your Family Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To contact your family members in the event of an emergency.</li> </ul>	No
Government Identifier Information	Driver's license, national identification number, passport number, social security number, national identity card details	<p>We collect and process your Government Identifier Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To verify your identity.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> </ul>	No
Personal Detail Information	Age, gender, date of birth, marital status, nationality, signature	<p>We collect and process your Personal Detail Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To provide products and services that you have requested.</li> <li>• To provide information that you have requested.</li> <li>• To provide event registration.</li> <li>• To improve our products and services.</li> <li>• To improve our events.</li> <li>• To comply with legal requirements.</li> </ul>	Yes

		<ul style="list-style-type: none"> <li>• To prevent fraud and abuse.</li> <li>• To market our products and services.</li> </ul>	
Personal Health Information	Information related to medical payment, medical claims data, medical history, products, or equipment used, health plan beneficiary, medical treatment	<p>We collect and process your Personal Health Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To assist in meal planning.</li> </ul>	No
Professional Experience and Affiliation Information	Professional memberships, qualifications, certifications	<p>We collect and process your Professional Experience and Affiliation Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To improve our products and services.</li> </ul>	No
Social Media Information	Social media accounts, social media content, social media history, profile information, posts, connections, likes, shares, comments, interactions, behavioral data, technical data	<p>We collect and process your Social Media Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To market our products and services to you.</li> <li>• To improve our products and services.</li> <li>• To comply with legal requirements.</li> </ul>	Yes

Data Category (Job Applicants)	Example Personal Identifiers	Purposes for Collection/Use	Shared with Third Parties
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Background Check Information	Criminal history, criminal records, driving citations	<p>We collect and process your Background Check Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To understand your needs and interests.</li> <li>• To prevent fraud and abuse.</li> <li>• To verify your identity and qualifications.</li> <li>• To assess your suitability for the position.</li> <li>• To comply with legal requirements, such as those related to employment law or anti-discrimination law.</li> <li>• To protect the safety and security of our employees and customers.</li> <li>• To prevent fraud and abuse.</li> <li>• To improve our decision-making about hiring, promotion, and other employment-related decisions.</li> </ul>	No
Contact Information	Name, postal address, phone number, mailing address, email address, physical location	<p>We collect and process your Contact Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To verify your identity.</li> <li>• To communicate with you about our products and services.</li> <li>• To improve our security.</li> <li>• To improve our events.</li> <li>• To invite you to our events or webinars.</li> <li>• To fulfill our contractual obligations to you.</li> <li>• To provide you with customer support.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> <li>• To improve our products and services.</li> </ul>	Yes

Device Information	Device type and operating system, device unique identifier, IP address, audio, video, device fingerprints	<p>We collect and process your Device Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To provide you with our products and services.</li> <li>• To protect our systems and networks.</li> <li>• To protect our users.</li> <li>• To comply with legal requirements.</li> </ul>	Yes
Education and Skills Information	Academic transcripts, educational degrees, education training and history, languages, letters of recommendation	<p>We collect and process your Education and Skills Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To verify the educational qualifications of job applicants.</li> <li>• To improve the company's recruitment and hiring processes.</li> </ul>	No
Employment Information	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	<p>We collect and process your Employment Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To verify the educational qualifications of job applicants.</li> <li>• To provide training and development opportunities for employees.</li> <li>• To improve the company's recruitment and hiring processes.</li> <li>• To comply with legal requirements.</li> </ul>	No
Emergency Contact Information	Name of emergency contact, contact information of emergency contact, relationship to individual, next of kin	<p>We collect and process your Emergency Contact Information to contact your emergency contact in an emergency.</p>	No
Government Identifier Information	Driver's license, national identification number, passport number, social security number, national identity card details	<p>We collect and process your Government Identifier Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To verify your identity.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> </ul>	No
Personal Detail Information	Age, gender, date of birth, marital status, nationality, signature	<p>We collect and process your Personal Detail Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To provide employment.</li> <li>• To provide information that you have requested.</li> <li>• To provide event registration.</li> <li>• To improve our products and services.</li> <li>• To improve our events.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> <li>• To market employment opportunities.</li> <li>• To market our benefits to you.</li> </ul>	Yes

Personal Health Information	Information related to medical payment, medical claims data, medical history, products, or equipment used, health plan beneficiary, medical treatment	We collect and process your Personal Health Information for the following purposes: <ul style="list-style-type: none"> <li>• To assist in meal planning.</li> </ul>	No
Professional Experience and Affiliation Information	Professional memberships, qualifications, certifications	We collect and process your Professional Experience and Affiliation Information for the following purposes: <ul style="list-style-type: none"> <li>• To evaluate your qualifications for employment.</li> <li>• To improve our products and services.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> </ul>	No
Referral Information	Name of referral, contact information of referral, relationship of referral	We collect and process your Referral Information for the following purposes: <ul style="list-style-type: none"> <li>• To evaluate your qualifications for employment.</li> <li>• To contact you about employment opportunities.</li> <li>• To improve our hiring process.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> </ul>	No
Sensitive Data	Race, ethnic origin, physical or mental health, religious beliefs, citizenship or immigration status, sexual orientation, genetic or biometric data, precise location (within 1750 ft), any data collected on a “known child”	We collect and process your Sensitive Data for the following purposes: <ul style="list-style-type: none"> <li>• To improve our products and services.</li> <li>• To comply with legal requirements such as anti-discrimination laws.</li> <li>• To protect the safety of employees or others.</li> <li>• To conduct research on the effectiveness of training programs or the impact of diversity in the workplace.</li> <li>• To prevent fraud and abuse.</li> </ul>	No

Data Category (Office Visitors)	Example Personal Identifiers	Purposes for Collection/Use	Shared with Third Parties
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Contact Information	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"> <li>• To market our products and services.</li> <li>• To send you marketing materials.</li> <li>• To verify your identity.</li> <li>• To identify potential clients.</li> <li>• To communicate with you about our products and services.</li> <li>• To contact you about your office visit.</li> <li>• To improve our security.</li> <li>• To improve our events.</li> <li>• To invite you to our events or webinars.</li> <li>• To fulfill our contractual obligations to you.</li> <li>• To provide you with customer support.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> </ul>	Yes
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		<ul style="list-style-type: none"> <li>To improve our products and services.</li> </ul>	
Device Information	Name of emergency contact, contact information of emergency contact, relationship to individual, next of kin	<p>We collect and process your Device Information for the following purposes:</p> <ul style="list-style-type: none"> <li>To provide you with our products and services.</li> <li>To protect our systems and networks.</li> <li>To protect our users.</li> <li>To comply with legal requirements.</li> </ul>	Yes
Emergency Contact Information	Name of emergency contact, contact information of emergency contact, relationship to individual, next of kin	<p>We collect and process your Emergency Contact Information to contact your emergency contact in an emergency.</p>	No
Government Identifier Information	Driver's license, national identification number, passport number, social security number, national identity card details	<p>We collect and process your Government Identifier Information for the following purposes:</p> <ul style="list-style-type: none"> <li>To verify your identity.</li> <li>To comply with legal requirements.</li> <li>To prevent fraud and abuse.</li> </ul>	No
Personal Detail Information	Age, gender, date of birth, marital status, nationality, signature	<p>We collect and process your Personal Detail Information for the following purposes:</p> <ul style="list-style-type: none"> <li>To provide products and services that you have requested.</li> <li>To provide information that you have requested.</li> <li>To provide event registration.</li> <li>To improve our products and services.</li> <li>To improve our events.</li> <li>To comply with legal requirements.</li> <li>To prevent fraud and abuse.</li> </ul>	Yes
Personal Health Information	Information related to medical payment, medical claims data, medical history, products, or equipment used, health plan beneficiary, medical treatment	<p>We collect and process your Personal Health Information for the following purposes:</p> <ul style="list-style-type: none"> <li>To assist in meal planning.</li> </ul>	No

Data Category (Prospective Clients)	Example Personal Identifiers	Purposes for Collection/Use	Shared with Third Parties
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Background Check Information	Criminal history, criminal records, driving citations	<p>We collect and process your Background Check Information for the following purposes:</p> <ul style="list-style-type: none"> <li>To understand your needs and interests.</li> <li>To assess your suitability for our products or services.</li> <li>To comply with legal requirements, such as those related to anti-money laundering or know-your-customer laws.</li> <li>To prevent fraud and abuse.</li> <li>To improve our decision-making about marketing and sales.</li> </ul>	No
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Contact Information	Name, postal address, phone number, mailing address, email address, physical location	<p>We collect and process your Contact Information for the following purposes:</p> <ul style="list-style-type: none"> <li>To register you as a new client.</li> <li>To market our products and services.</li> <li>To send you marketing materials.</li> <li>To verify your identity.</li> <li>To identify potential clients.</li> <li>To communicate with you about our products and services.</li> <li>To improve our security.</li> <li>To improve our events.</li> <li>To invite you to our events or webinars.</li> <li>To fulfill our contractual obligations to you.</li> <li>To provide you with customer support.</li> </ul>	Yes
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		<ul style="list-style-type: none"> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> <li>• To improve our products and services.</li> </ul>	
Device Information	Device type and operating system, device unique identifier, IP address, audio, video, device fingerprints	<p>We collect and process your Device Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To provide you with our products and services.</li> <li>• To protect our systems and networks.</li> <li>• To protect our users.</li> <li>• To comply with legal requirements.</li> </ul>	Yes
Emergency Contact Information	Name of emergency contact, contact information of emergency contact, relationship to individual, next of kin	We collect and process your Emergency Contact Information to contact your emergency contact in an emergency.	No
Government Identifier Information	Driver's license, national identification number, passport number, social security number, national identity card details	<p>We collect and process your Government Identifier Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To verify your identity.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> </ul>	No
Personal Detail Information	Age, gender, date of birth, marital status, nationality, signature	<p>We collect and process your Personal Detail Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To provide products and services that you have requested.</li> <li>• To provide information that you have requested.</li> <li>• To provide event registration.</li> <li>• To improve our products and services.</li> <li>• To improve our events.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> <li>• To market our products and services.</li> </ul>	Yes
Personal Health Information	Information related to medical payment, medical claims data, medical history, products, or equipment used, health plan beneficiary, medical treatment	<p>We collect and process your Personal Health Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To assist in meal planning.</li> </ul>	No
Professional Experience and Affiliation Information	Professional memberships, qualifications, certifications	<p>We collect and process your Professional Experience and Affiliation Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To improve our products and services.</li> <li>• To comply with legal requirements.</li> <li>• To market our products and services to you.</li> <li>• To prevent fraud and abuse.</li> </ul>	No
Social Media Information	Social media accounts, social media content, social media history, profile information, posts, connections, likes, shares, comments, interactions, behavioral data, technical data	<p>We collect and process your Social Media Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To market our products and services to you.</li> <li>• To improve our products and services.</li> <li>• To comply with legal requirements.</li> </ul>	Yes

<b>Data Category (Subscribers)</b>	<b>Example Personal Identifiers</b>	<b>Purposes for Collection/Use</b>	<b>Shared with Third Parties</b>
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Contact Information	Name, postal address, phone number, mailing address, email address, physical location	<p>We collect and process your Contact Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To market our products and services.</li> <li>• To send you marketing materials.</li> <li>• To verify your identity.</li> <li>• To identify potential clients.</li> <li>• To communicate with you about our products and</li> </ul>	Yes
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		<p>services.</p> <ul style="list-style-type: none"> <li>• To contact you about your account.</li> <li>• To improve our security.</li> <li>• To improve our events.</li> <li>• To invite you to our events or webinars.</li> <li>• To fulfill our contractual obligations to you.</li> <li>• To provide you with customer support.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> <li>• To improve our products and services.</li> </ul>	
Device Information	Device type and operating system, device unique identifier, IP address, audio, video, device fingerprints	<p>We collect and process your Device Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To provide you with our products and services.</li> <li>• To improve our products and services that you have requested.</li> <li>• To protect our systems and networks.</li> <li>• To protect our users.</li> <li>• To comply with legal requirements.</li> <li>• To market our products and services to you.</li> </ul>	Yes
Emergency Contact Information	Name of emergency contact, contact information of emergency contact, relationship to individual, next of kin	We collect and process your Emergency Contact Information to contact your emergency contact in an emergency.	No
Personal Detail Information	Age, gender, date of birth, marital status, nationality, signature	<p>We collect and process your Personal Detail Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To provide products and services that you have requested.</li> <li>• To provide information that you have requested.</li> <li>• To improve our products and services.</li> <li>• To improve our events.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> <li>• To market our products and services.</li> </ul>	Yes
Social Media Information	Social media accounts, social media content, social media history, profile information, posts, connections, likes, shares, comments, interactions, behavioral data, technical data	<p>We collect and process your Social Media Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To understand your interests and preferences.</li> <li>• To personalize your experience.</li> <li>• To market our products and services to you.</li> <li>• To improve our products and services.</li> <li>• To comply with legal requirements.</li> </ul>	Yes

Data Category (Third Parties)	Example Personal Identifiers	Purposes for Collection/Use	Shared with Third Parties
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Contact Information	Name, postal address, phone number, mailing address, email address, physical location	<p>We collect and process your Contact Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To verify your identity.</li> <li>• To communicate with you about our products and services.</li> <li>• To improve our security.</li> <li>• To improve our events.</li> <li>• To invite you to our events or webinars.</li> <li>• To fulfill our contractual obligations to you.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> <li>• To improve our products and services.</li> </ul>	Yes
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Device Information	Device type and operating system, device unique identifier, IP address, audio, video, device fingerprints	We collect and process your Device Information for the following purposes: <ul style="list-style-type: none"> <li>• To provide you with our products and services.</li> <li>• To protect our systems and networks.</li> <li>• To protect our users.</li> <li>• To comply with legal requirements.</li> </ul>	Yes
Emergency Contact Information	Name of emergency contact, contact information of emergency contact, relationship to individual, next of kin	We collect and process your Emergency Contact Information to contact your emergency contact in an emergency.	No
Financial Detail Information	Bank account information, bank statements, compensation data, and other financial-related details such as income, investments, benefits, tax status	We collect and process your Financial Detail Information for the following purposes: <ul style="list-style-type: none"> <li>• To process payments.</li> <li>• To verify your identity.</li> <li>• To conduct due diligence.</li> <li>• To protect our interests.</li> <li>• To negotiate acquisitions.</li> <li>• To comply with legal requirements.</li> <li>• To protect against fraud and abuse.</li> </ul>	No
Government Identifier Information	Driver's license, national identification number, passport number, social security number, national identity card details	We collect and process your Government Identifier Information for the following purposes: <ul style="list-style-type: none"> <li>• To verify your identity.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> </ul>	No
Personal Detail Information	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"> <li>• To provide information that you have requested.</li> <li>• To provide event registration.</li> <li>• To improve our products and services.</li> <li>• To improve our events.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> </ul>	Yes
Personal Health Information	Information related to medical payment, medical claims data, medical history, products, or equipment used, health plan beneficiary, medical treatment	We collect and process your Personal Health Information for the following purposes: <ul style="list-style-type: none"> <li>• To assist in meal planning.</li> </ul>	No
Referral Information	Name of referral, contact information of referral, relationship of referral	We collect and process your Referral Information for the following purposes: <ul style="list-style-type: none"> <li>• To evaluate your qualifications for employment.</li> <li>• To contact you about employment opportunities.</li> <li>• To improve our hiring process.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> </ul>	No
Sensitive Data	Race, ethnic origin, physical or mental health, religious beliefs, citizenship or immigration status, sexual orientation, genetic or biometric data, precise location (within 1750 ft), any data collected on a "known child"	We collect and process your Sensitive Data for the following purposes: <ul style="list-style-type: none"> <li>• To comply with legal requirements such as anti-discrimination laws.</li> <li>• To protect the safety of employees or others.</li> <li>• To conduct research on the effectiveness of training programs or the impact of diversity in the workplace.</li> </ul>	No

Workplace Welfare Information	Bullying and harassment details	<p>We collect and process your Workplace Welfare Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To improve our workplace welfare programs.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> </ul>	No
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Data Category (Website Users)	Example Personal Identifiers	Purposes for Collection/Use	Shared with Third Parties
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Browsing Information	Browsing time, cookie information, IP address, web beacons, device fingerprinting, unprecise 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	<p>We collect and process your Browsing Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To understand your interests and needs.</li> <li>• To improve the performance of our marketing campaigns.</li> <li>• To improve the performance of our website.</li> <li>• To personalize the content and advertising that we show to users.</li> <li>• To prevent fraud and abuse.</li> <li>• To comply with legal requirements.</li> <li>• To improve the security of our website, systems, and services.</li> </ul>	Yes
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Contact Information	Name, postal address, phone number, mailing address, email address, physical location	<p>We collect and process your Contact Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To market our products and services.</li> <li>• To send you marketing materials.</li> <li>• To verify your identity.</li> <li>• To identify potential clients.</li> <li>• To communicate with you about our products and services.</li> <li>• To contact you about your account.</li> <li>• To improve our security.</li> <li>• To improve our events.</li> <li>• To invite you to our events or webinars.</li> <li>• To provide you with customer support.</li> <li>• To comply with legal requirements.</li> <li>• To prevent fraud and abuse.</li> <li>• To improve our products and services.</li> </ul>	Yes
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Device Information	Device type and operating system, device unique identifier, IP address, audio, video, device fingerprints	<p>We collect and process your Device Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To provide you with our products and services.</li> <li>• To improve our products and services that you have requested.</li> <li>• To protect our systems and networks.</li> <li>• To protect our users.</li> <li>• To comply with legal requirements.</li> </ul>	Yes
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		<ul style="list-style-type: none"> <li>• To market our products and services to you.</li> </ul>	
Social Media Information	Social media accounts, social media content, social media history, profile information, posts, connections, likes, shares, comments, interactions, behavioral data, technical data	<p>We collect and process your Social Media Information for the following purposes:</p> <ul style="list-style-type: none"> <li>• To understand your interests and preferences.</li> <li>• To personalize your experience.</li> <li>• To market our products and services to you.</li> <li>• To improve our products and services.</li> <li>• To comply with legal requirements.</li> </ul>	Yes

## 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 Data from Children under the age of 16 without prior verifiable parental consent.

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

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

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

We may need to disclose your Personal Data in certain circumstances as outlined below to carry out our business. We take your privacy seriously and will only disclose your Personal Data when it is necessary to do so. Furthermore, we have put in place safeguards to protect your Personal Data and will only disclose it to third parties who have agreed to protect it as well.

**Third-party suppliers, service providers, affiliates, and business partners:** Citrin Cooperman may disclose Personal Data to third-party suppliers, service providers, affiliates, and business partners to assist us in meeting business operation needs and to deliver our services and functions.

**Vendors:** Citrin Cooperman may disclose Personal Data to vendors who provide services to the firm, such as information technology services, cloud computing services, and data storage services. This is done to allow these vendors to perform their services effectively and efficiently.

**Investors:** Citrin Cooperman may disclose Personal Data to investors to provide them with information about the firm's financial performance and operations. This disclosure is necessary for investors to make informed investment decisions.

**Regulators:** Citrin Cooperman may disclose Personal Data to regulators to comply with legal and regulatory requirements. For example, Citrin Cooperman may be required to disclose Personal Data to the Securities and Exchange Commission in connection with an audit of a public company.

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

## Sharing, Including Targeted Advertising, of Personal Data

We may share Personal Data with third parties for various purposes, including Targeted 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, 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 for Targeted Advertising.

## 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 [Cookie and Other Automated Technologies Notice](#) to better understand our use of Cookies and Other Tracking Technologies, including your rights and how you can control your Personal Data 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 Personal Data 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](#).

## Sale of Personal Data

Citrin Cooperman does not sell your Personal Data.

## 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.

## Retention

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

## Your Data Protection Rights

As a Virginia resident, you have specific rights under the VCDPA to control your Personal Data.

**Right to Know What Personal Data Is Being Processed/Right to Access Personal Data.** You can ask us how we use your Personal Data upon verifiable request. Virginia residents have the right to request and, subject to certain exemptions, receive a copy of the specific pieces of Personal Data that we have collected about them and to have this delivered, free of charge, 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.

**Right to Correct Inaccurate Personal Data.** Subject to certain exceptions, you can ask us to fix any inaccurate Personal Data we have about you upon verifiable request.

**Right to Delete Personal Data.** 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 Data we have collected from you upon verifiable request.

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

### **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**

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

We cannot respond to your request or provide you with your Personal Data, except for requests to Opt-out of Sale/Sharing of My Personal Information (including for Targeted Advertising), 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.

You can only make a verifiable consumer request for access to your Personal Data or to port your Personal Data twice in a 12-month period. Your request must:

Provide enough information so that we can reasonably verify that you are the person whose Personal Data we collected or 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 as a Virginia resident, please leverage our [Data Subject Access Request Form](#) or contact us by email at [privacy@citrincooperman.com](mailto:privacy@citrincooperman.com), or by phone at (888) 450-2221. You are not required to pay any charge for exercising your rights.

Once you have submitted a request, we will respond to you within forty-five (45) days. If, for some reason, you do not receive a response within forty-five (45) days of your submitted request, please send an email to [privacy@citrincooperman.com](mailto:privacy@citrincooperman.com), as an error may have occurred. If we cannot verify your identity within the forty-five-day (45) time period, we may deny the request. If necessary, we may take up to an additional forty-five (45) calendar days to respond to a request, for a maximum total of ninety (90) calendar days from the date the request is received, provided that we contact you with an explanation of the reason why we will take more than forty-five (45) days to respond to the request. If we are unable to assist you, we will notify you within forty-five (45) days of the date you submitted the request and provide you with notice and an explanation of the reason we are not able to fulfill your request, including how to appeal our determination.

### **Anti-discrimination**

We cannot and will not discriminate against you for exercising your VCDPA 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 at a different level or quality.

### **Appeal Process**

If your request is denied, please leverage our [Data Subject Access Request Form](#) and select option "Appeal Citrin Cooperman's Refusal to Take Action on a Request." We will respond within sixty (60) days of receipt of your appeal. You may contact the Virginia Attorney General through its website: [Contact Info \(state.va.us\)](#) regarding any complaints you may have with respect to the exercise of your rights.

### **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 Addendum is available to individuals with disabilities. To access this Addendum in an alternative downloadable format, please [click here](#)