



The Siegfried Group, LLP

Privacy Policy (Last Updated January 1, 2020)

This policy applies to The Siegfried Group, LLP and its affiliated companies (collectively “Siegfried”). Siegfried understands that your privacy is important to you and is committed to safeguarding the confidentiality and privacy of personal information entrusted to it. This Privacy Policy describes how Siegfried handles and protects your personal information in connection with the hosting of this website, and the provision of its diverse accounting, finance, business advisory, and leadership advisory services (“Services”).

Scope of this policy

This policy applies to personal information which is collected and/or used by Siegfried. The contexts in which this might occur are explored under “*When do we collect personal information*” below.

Your Acceptance

In respect of personal information collected over this and other Siegfried websites, your continued use of these websites constitutes your understanding of, and agreement to, the practices described in this Privacy Policy and elsewhere on the websites as well as any subsequent updates. The continued use of this website after any change to this policy constitutes acceptance of those changes. Please check back periodically for updates.

When do we collect personal information?

We collect information about you if:

- you use a Siegfried website;
- have email, text, and other electronic communication with Siegfried;
- interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy;
- you enquire about, or engage Siegfried to provide, its Services (either in a personal capacity, or as a representative for your employer or client);
- the use of your personal information is reasonably necessary to provide our Services (in these circumstances, your personal information may be disclosed to us by our client who may, for example, be your employer or service provider, or we may obtain your personal information from a range of public or subscription sources, directly from you, or from your associates or persons known to you);
- you apply for a position with Siegfried;
- you attend a Siegfried hosted or sponsored event or webinar; or
- you contact us with any other inquiry, complaint, or notice.

What types of personal information are collected and what do we use it for?

The following is a summary of the types of personal information we collect, and the purposes for which that information is used.

Website Users

Siegfried collects your name, address, e-mail address, telephone number and any other information that may contain personally-identifiable information which you voluntarily provide as "comments" when you submit an inquiry through the "Contact Us" tool. Siegfried also collects other background information about you in connection with career-related inquiries that you submit through its websites.

Siegfried may also automatically collect personal information (through the use of Cookies or similar technologies, including your IP address, device identifier, browsing patterns on its websites, click stream data, and HTTP protocol elements) to ensure the effective operation of the website or in order to align the presentation of our Services more closely to your requirements (for example, processing information about your broad geographic location to serve you with a local version of this website). This tracking information is stored in an anonymous, aggregated and de-identified format. De-identified data is used to understand and analyze trends, to administer the websites, and to learn about user behavior on the websites. De-identified means information that cannot reasonably identify, relate to, describe, be capable of being associated with, or be linked, directly or indirectly to a particular user.

In particular, Siegfried, through its websites and other business activity, has collected the following categories of personal information from the websites' consumers or Siegfried's clients or potential clients within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES

C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	YES

K. Inferences drawn from other personal information.	Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES
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All of the information is either provided directly from you, or collected automatically as you navigate the Siegfried website.

Siegfried's Former, Current, and Prospective Clients

If you submit an inquiry to Siegfried about our Services (over our websites, or by emailing, telephoning, or meeting with one of our colleagues), we will process information such as your name, job title, and contact information in order to respond to your inquiry.

If you attend a Siegfried event (in-person or virtual), or if you associate with a Siegfried colleague at, for example, an industry event, Siegfried may collect basic personal information, such as contact details, which you voluntarily provide (for example, by filling in a form or handing over a business card) in order to facilitate your participation in the event, and for the management of our relationship with you as an actual or prospective client.

If you or the organization you are associated with becomes a Siegfried client, we may process your personal information in order to:

- carry out “Know Your Client” checks and screening prior to starting a new engagement (as well as basic contact information, this may mean processing compliance related information such as proof of your identity, information about your professional background, history of directorships and, in some circumstance, details of any criminal convictions or adverse media coverage);
- carry out background checks for the purposes of complying with anti-money laundering and terrorist financing laws;
- carry out client communication, billing, and administration;
- operate and service our clients;
- provide you with news and general information about Siegfried and the services we provide; and
- deal with client complaints.

We also process personal information about our clients (former, current, and prospective) in order to:

- send our clients newsletters, know-how, promotional material, and other marketing communications;
- invite our clients to events (and arrange and administer those events).

Performing Services for Our Clients

The information collected by, or provided to Siegfried, is used exclusively by Siegfried, as described in this Privacy Policy, and in the performance of services as requested by clients and potential clients, and for the optimization of those services. Siegfried holds all personal information in strict confidence and will only disclose such information to any third-party when expressly permitted to do so by applicable law.

Other Uses

If you apply for a position with Siegfried, we use all information necessary, including personal information, in order to consider your application, and during any interview and assessment phase.

If you contact us for any other reason, we will collect basic contact details, as well as any other information that you provide, including personal information, necessary to resolve that inquiry.

Disclosure of Personal Information to Third Parties

Siegfried will not disclose your personal information to third parties other than as described in this Privacy Policy unless Siegfried has your permission or is required or permitted by law. Siegfried may share such information with its affiliates as necessary to carry out the purposes for which the information was supplied or collected. Similarly, Siegfried may disclose your personal information to thirdparty contractors, consultants, and/or vendors engaged by Siegfried for a business purpose and then only to the extent required to perform their services. When Siegfried discloses any personal information to a third party for a business purpose, Siegfried requires that third party to agree to keep your personal information confidential and to use it only for the business purpose for which it was provided.

Siegfried may also disclose your personal information for the purposes of:

- responding to requests from law enforcement agencies, regulators, or courts, or to subpoenas, search warrants, or other legal requests;
- the prevention and/or detection of crime;
- establishing legal rights or to investigate or pursue legal claims;
- a merger, acquisition or corporate restructuring to which Siegfried is subject;
- preventing risk of harm to an individual;
- for any other purpose disclosed by us when you provide the information; or
- with your consent.

Sale of Personal Information to Third Parties

Siegfried will never sell any personal data provided to us.

International Hosting and Transfer of Information

Siegfried's business is focused on the United States exclusively but recognizes that it may from time to time receive information from persons or entities outside of the U.S. Siegfried may store such information in a jurisdiction other than where you are based including outside of the European Economic Area ("EEA").

Siegfried will take appropriate steps to ensure that transfers of personal information are in accordance with applicable law and carefully managed to protect your privacy rights and interests and transfers are limited to countries which are recognized as providing an adequate level of legal protection or where we can be satisfied that alternative arrangements are in place to protect your privacy rights.

Information Security

Siegfried has reasonable technical safeguards, security policies, and procedures in place to protect personal information from unauthorized loss, misuse, alteration, or destruction. Measures we take include placing confidentiality requirements on our staff members and service providers, limiting access to your personal information on a “need to know” basis, and providing training to appropriate Siegfried personnel. We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls.

Unfortunately, the transmission of information via the internet is never completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on our websites.

Retention of your personal information

Siegfried retains your personal information for a period of time required to provide the services for which such personal information was collected, any compatible purposes which are subsequently established, or any new purposes to which you subsequently consent, or to comply with legal, regulatory, and Siegfried policy requirements. This period of time will usually be the period of your, or the relevant client's, relationship or contract with Siegfried plus a period reflecting the length of time for which legal claims may be made following the termination of such relationship or contract, as the same may be extended by the requirements of any applicable law. Some information (such as call recordings, tax records, and certain information required to demonstrate regulatory compliance) may need to be kept for longer. Personal information will be kept for a shorter or longer period of time if required by law or a Siegfried policy, if the information becomes subject to a legal hold (for example, following a communication from our regulator) or if we have identified through a data protection impact assessment that a different retention period is appropriate. Regardless of the applicable retention schedule, the same technical and administrative safeguards will be applied.

Siegfried Privacy Notice for California Residents

This section of the Privacy Notice for California Residents supplements the information contained in Siegfried’s Privacy Policy and applies solely to all visitors, users, and others who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this notice.

Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA’s scope, like:

- health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
- personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

Sharing Personal Information

Siegfried may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

Disclosures of Personal Information for a Business Purpose

In the preceding twelve (12) months, Siegfried has disclosed the following categories of personal information for a business purpose:

Category A: Identifiers.

Category B: California Customer Records personal information categories.

Category C: Protected classification characteristics under California or federal law.

Category I: Professional or employment-related information.

Category J: Non-public education information.

We disclose your personal information for a business purpose to the following categories of third parties:

- Service providers.
- Clients.

Access to Specific Information and Data Portability Rights

You have the right to request that Siegfried disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.

- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we disclosed your personal information for a business purpose, the personal information categories that each category of recipient obtained.

Sale of Personal Information to Third Parties

Siegfried will never sell any personal data provided to us.

Deletion Request Rights

You have the right to request that Siegfried delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.

- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at (844) 472-8805.
- Sending an email to privacy@siegfriedgroup.com.

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Other California Privacy Rights. California’s “Shine the Light” law (Civil Code Section § 1798.83) permits users of our website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to privacy@siegfriedgroup.com.

Marketing

Siegfried may send you information related to its services, products and events that we believe are of interest to you. This information may be sent by post or via email. If at any point you no longer prefer to receive marketing communications from Siegfried you can (i) unsubscribe from Siegfried communications sent by email using a link provided in marketing emails sent from Siegfried; or (ii) contact us to exercise your right to prevent all forms of marketing (both post and email).

Children

Siegfried’s websites are not intentionally designed for or directed at children under the age of 16. It is Siegfried’s policy never to knowingly collect or maintain information about anyone under the age of 16, except as part of an engagement to provide professional services or in our community work through our Siegfried Youth Leadership Program™ (SYLP). SYLP is a special leadership development program designed for students in grades 8 through 12, as well as their teachers and mentors. The personal information collected through SYLP includes personal identifiers including a participant’s name, school, and grade level.

Links

Siegfried websites may contain links to other sites, including websites maintained by Siegfried affiliates that are governed by other privacy policies that may differ somewhat

from this one. Users should review the privacy policy of each website visited before disclosing any personal information. To the extent that Siegfried provides links to third party websites, such links do not constitute an endorsement, sponsorship, or recommendation by Siegfried of the third parties, the third-party websites, or the information contained on those websites, and Siegfried is not responsible or liable for your use of such third-party websites. Where appropriate you should review the privacy policies of any websites or applications before submitting personal information.

Changes to this Policy

By using Siegfried websites you consent to the collection, use and storage of personal information as described in this Privacy Policy and elsewhere on the websites. Siegfried reserves the right to make changes to this Privacy Policy from time to time. Siegfried will notify you by posting amendments to the Privacy Policy on this website. If we make material changes to how we treat our users' personal information, we will notify you by email. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

Contact Us

If you have questions or concerns regarding this policy or Siegfried's personal data processing policies, please contact Siegfried at: privacy@siegfriedgroup.com.

Special Notice for Nevada Residents

Nevada residents who wish to exercise their sale opt-out rights under Nevada Revised Statutes Chapter 603A may submit a request to privacy@siegfriedgroup.com. However, please know we do not currently sell data triggering that statute's opt-out requirements.