

# Carmichael Lynch.

Effective Date: January 1, 2020

## CALIFORNIA CONSUMER PRIVACY ACT PRIVACY NOTICE

**Carmichael Lynch, Inc. and its affiliates (“Carmichael Lynch,” “we,” “us,” or “our”) provide this Privacy Notice which applies to California resident employees, employee applicants, owners, directors, officers, or contractors of Carmichael Lynch, including as applicable, those individuals’ emergency contacts and beneficiaries. This Privacy Notice sets forth our privacy practices as required by the CCPA. Please note, there may be additional or different privacy notices or disclosures that govern our use of your personal information beyond the CCPA. Where collection, use and disclosure of personal information is subject to the CCPA, this Privacy Notice shall prevail. For collection, use and disclosure of personal information beyond the CCPA, those separate and relevant privacy notices and disclosures shall prevail. Any terms defined in the CCPA have the same meaning when used in this notice.**

Pursuant to the California Consumer Privacy Act of 2018 (“**CCPA**”), we provide the following details regarding the categories of Personal Information we have collected or disclosed within the preceding twelve (12) months:

- (1) We collected the following categories of Personal Information:
  - A. Identifiers, such as name and government-issued identifier (e.g., Social Security number);
  - B. Personal information, as defined in the California safeguards law, including without limitation, name, signature, SSN, 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;
  - C. Characteristics of protected classifications under California or federal law, including without limitation, age, gender, medical conditions, marital status, sex (including pregnancy, childbirth, breastfeeding, and related medical conditions), race, color, religion or creed, ancestry, national origin, disability, genetic information, AIDS/HIV status, sexual orientation, gender identity and expression, citizenship, primary language, immigration status, military/veteran status, political affiliation/activities, domestic violence victim status, and request for leave;
  - D. Commercial information, such as transaction information and purchase history;
  - E. Biometric information, such as face scans, fingerprints and voiceprints;
  - F. Internet or network activity information, such as browsing history and interactions with our websites;
  - G. Geolocation data, such as device location;
  - H. Audio, electronic, visual and similar information, such as call and video recordings;
  - I. Professional or employment-related information, such as work history and prior employer;
  - J. Education information subject to the federal Family Educational Rights and Privacy Act, such as student records and directory information; and
  - K. Inferences drawn from any of the Personal Information listed above to create a profile or summary about, for example, an individual’s preferences and characteristics.

We collected this Personal Information directly from California residents themselves, as well as from publicly available databases and third-party sources of information. We collected Personal Information about our employees’ and other individuals’ emergency contacts and beneficiaries from such employees or other individuals.

We may use this Personal Information to operate, manage, and maintain our business, for our employment purposes, and to otherwise accomplish our business purposes and objectives. Our business purposes and objectives include, for example, developing and improving our services and programs for our employees; conducting research, analytics, and data analysis; maintaining our facilities and infrastructure; undertaking quality and safety assurance measures; conducting risk and security controls and monitoring; detecting and preventing fraud; performing identity verification; performing accounting, audit, and other internal functions, such as internal investigations; complying with law, legal process, and internal policies; maintaining records; and exercising and defending legal claims.

(2) We disclosed the following Personal Information to third parties, such as our service providers and affiliates, for our operational business purposes:

- A. Identifiers, such as name and government-issued identifier (e.g., Social Security number);
- B. Personal information, as defined in the California safeguards law, including without limitation, name, signature, SSN, 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;
- C. Characteristics of protected classifications under California or federal law, including without limitation, age, gender, medical conditions, marital status, sex (including pregnancy, childbirth, breastfeeding, and related medical conditions), race, color, religion or creed, ancestry, national origin, disability, genetic information, AIDS/HIV status, sexual orientation, gender identity and expression, citizenship, primary language, immigration status, military/veteran status, political affiliation/activities, domestic violence victim status, and request for leave;
- D. Commercial information, such as transaction information and purchase history;
- E. Biometric information, such as fingerprints and voiceprints;
- F. Internet or network activity information, such as browsing history and interactions with our websites;
- G. Geolocation data, such as device location;
- H. Audio, electronic, visual and similar information, such as call and video recordings;
- I. Professional or employment-related information, such as work history and prior employer;
- J. Education information subject to the federal Family Educational Rights and Privacy Act, such as student records and directory information; and
- K. Inferences drawn from any of the Personal Information listed above to create a profile or summary about, for example, an individual's preferences and characteristics.

(3) We have not "sold" Personal Information for purposes of the CCPA.

For purposes of this CCPA Notice, "sold" or "sale" means the disclosure of Personal Information for monetary or other valuable consideration but does not include, for example, the transfer of Personal Information as an asset that is part of a merger, bankruptcy, or other disposition of all or any portion of our business.

If you have questions regarding this Privacy Notice, please contact your local Human Resources department or CCPA Privacy Champion.

Last reviewed 1/31/2020