RUDER FINN, INC. PRIVACY POLICY

Updated and effective as of July 31, 2026

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This is the Privacy Policy of Ruder Finn, Inc., a New York corporation, and its affiliates listed below (collectively, "Ruder Finn"). This Privacy Policy ("Policy") describes how we collect, process, and share Personal Data, your rights & choices, and other important information about how we handle your Personal Data.

Who we are

"**Ruder Finn**" means Ruder Finn, Inc., RF Bloom, Inc., RF Osmosis, Inc., The Equity Group, Inc., The SPI Group LLC, TouchdownPR, Inc., Big Sky Communications, Inc., Flightpath, Inc. and Peppercomm LLC, operating under the Ruder Finn Group of companies (collectively also referred to as "**we**", "**our**", or "**us**" in this privacy policy).

Scope of this Policy

This privacy policy applies to the sites that we operate and that link to this privacy policy (collectively, the "**Website(s)**"). By using the Website, you acknowledge the processing of Personal Data by Ruder Finn as described in this privacy policy.

This privacy policy does not govern information we process on behalf of our clients. For details about the processing of client data, please see the "Information from Our Clients" section below.

If you are a resident of the following jurisdictions, please see the additional information at the end of this policy:

- California and other US States
- European Economic Area, United Kingdom, and Switzerland

If you have any questions or wish to exercise your rights and choices, please contact us as set out in the "How to Contact Us" section.

Information from our Clients

We provide services to our clients and we may collect and process Personal Data about individuals (including through tracking technologies) at the direction of our clients ("**client data**"). Our processing of client data is governed by the terms of our service agreements with our clients, and not this Privacy Policy. In the event we are permitted to process client data for our own purposes, we will process the client data in accordance with the practices described in this Privacy Policy. We are not responsible for how our clients treat the information we collect on their behalf, and we recommend you review the client's privacy policy for more information and contact the relevant client for more information or to exercise your rights in the personal data they collect.

Links to Other Websites We Don't Control

Our Website may contain links to other websites, such as those of our affiliates and clients. Ruder Finn is not responsible for any websites that it does not own or operate. You should carefully review the privacy policies and practices of other websites that you link to from the Website, as we cannot control or be responsible for their privacy practices.

CATEGORIES AND SOURCES OF PERSONAL DATA

The following describes the categories of data relating to identified or identifiable individuals and households ("**Personal Data**") that we collect, and how we collect it.

Categories of Personal Data We Process

The categories of Personal Data we process may include:

Employment Data

Data relating to professional or employment history, qualifications, and similar biographic information.

Contact Identifiers

Identity Data we can use to contact you, such as your name, email and physical addresses, phone numbers, social media or communications platform usernames/handles.

Device Identifiers

Your device's IP address and Ad ID.

Device Information

Your device's operating system and browser (e.g., type, version, and configuration), internet service provider, and regional and language settings.

Characteristics or Demographics

Your date of birth, age and/or age range, gender, and country of residence.

Internet or Other Network Activity

Browsing history, search history, and information regarding your interaction with a website, application, or advertisement (e.g. IP Address, MAC Address, SSIDs, application ID/AdID/IDFA, session navigation history and similar browsing metadata, and other data generated through applications and browsers, including cookies and similar technologies or other device identifiers or persistent identifiers), online user IDs, web server logs, application logs, first party cookies, third party cookies, web beacons, clear gifs and pixel tags.

Non-precise location data

Location information derived from social media tags/posts, or from IP address.

Account Credentials

Information such as your user IDs; account login details, e.g. username and password.

Inference Data

Personal Data we create or use as part of a profile reflecting your preferences, characteristics, market segments, or your interests.

User Content

Unstructured/free-form data that may include any category of Personal Data, e.g. data that you give us in free text fields such as the contact us request form.

Sensitive Personal Data

Unless prohibited by local law, and subject to your consent should it be required under local law, Personal Data defined as "sensitive" or "special categories of Personal Data" under local laws. As described further below, we may collect the following categories of Sensitive Personal Data:

- "Government ID Data" Data relating to official government identification, such as social security number, driver's license, or passport numbers, including similar Identity Data protected as Sensitive Data under applicable law.

Sources of Personal Data We Process

We collect Personal Data from various sources, which include:

Data you provide us

We receive Personal Data when you provide it to us, when you purchase our products or services, complete a transaction via our Website, or when you otherwise use our Website. For example, you may provide Personal Data in several ways, e.g.: (i) accessing and using our Websites; (ii) subscribing to or ordering newsletters and/or publications; (ii) participating in "join our mailing list" initiatives; (iii) participating in bulletin boards, discussion or message forums; (iv) entering or participating in surveys or quizzes; (v) registering for events and conferences; and (vi) when otherwise interacting with us.

Data we collect from your devices

We automatically collect Personal Data about or generated by any device used to access our Website.

Service Providers

We receive Personal Data from service providers performing services on our behalf, including payment processors or web hosting service providers.

Social Media Companies and other Third-Party Vendors

We receive Personal Data from social media companies and Targeted Advertising vendors when we engage in Targeted Advertising and social media marketing, or if you interact with that social media or other company on or in connection with us on social media sites (e.g. our pages on social media sites). We may also obtain information from third-party vendors and related parties we work with in connection with receiving analytics, security, and fraud prevention services.

Data we create or infer

We, certain partners, social media companies, and third parties operating on our behalf, create and infer Personal Data such as Inference Data or aggregate data based on our observations or analysis of other Personal Data processed under this Policy, and we may correlate this data with other data we process about you.

Information from Other Sources

We also collect Personal Data from other sources. The categories of sources from which we collect Personal Data include data brokers from which we purchase data to supplement the data we collect, survey providers, social networks with which you interact, partners that offer co-branded services, sell or distribute our products, or engage in joint marketing activities, and publicly-available sources, including data in the public domain.

How We Process Information

Our Websites

Ruder Finn collects Personal Data through its Website. The categories of Personal Data we collect typically includes the Account Credentials, Employment Data (e.g. information about your employer) and Contact Identifiers you provide, as well as certain Device/Network Data/Activity that we collect automatically.

We generally use this Personal Data in order to:

- Operate and manage the Websites;
- Understand trends, usage, and activity, including through tracking technologies, to make business and marketing decisions;
- Prevent or address fraud, breach of our policies, or other threats of harm;
- Send you technical notices regarding updates to our policies, or other administrative messages;
- Fulfill our Business Purposes;
- Engage in Targeted Advertising or
- Fulfill any other purpose at your direction or with your consent.

Notwithstanding the above, we may use information that does not identify you (including information that has been aggregated or de-identified) for any purpose except as prohibited by applicable law. For information on your rights and choices regarding how we use information about you, please see the “Your Rights and Choices” section below.

Cookies and Similar Technologies

Our Website uses technologies such as “cookies” and other tracking technologies. Cookies are a common part of many commercial websites and allow small text files to be sent by a website, accepted by a web browser, and then placed on your device. You do not need to enable cookies to visit the Website; however, some parts of the Website and some services may be unavailable if cookies are disabled. Some Ruder Finn cookie files will remain on your device unless and until you manually delete the file. You may generally control your cookie preferences in your browser settings.

We may also use pixels (also known as web beacons) which is code embedded in a service that sends information about your use to a server. There are various types of pixels, including image pixels (which are small graphic images) and JavaScript pixels (which contains JavaScript code). When you access a service that contains a pixel, the pixel may permit us or a separate entity to drop or read cookies on your browser or collect other information about your visit.

We process Account Credentials, Device/Network Data/Activity, Contact Identifiers, Inference Data, Non-precise Location Data, and other non-Personal Data in connection with our use of cookies and similar technologies on our Websites. We and authorized third parties may use cookies and similar technologies for the following purposes, subject to your consent where required, as described below:

- We automatically collect data using cookies and similar technologies for “essential” purposes necessary for our Website to operate (such as maintaining user sessions, CDNs, and the like). This processing is mandatory.

Additionally, with your consent or subject to your opt-out right (as applicable), we may collect data using cookies and similar technologies:

- for "functional" purposes, such as to enable certain features of our Website;
- for "analytics" purposes or to improve our Website, such as to analyze the traffic to and on our Website (for example, we can count how many people have looked at a specific page, or see how visitors move around the website when they use it, to distinguish unique visits/visitors to our Website, and what website they visited prior to visiting our website, and use this information to understand user behaviors and improve the design and functionality of the website);
- for "retargeting," Targeted Advertising, or other advertising and marketing purposes, including technologies that process Inference Data or other data so that we can deliver, buy, or target advertisements which are more likely to be of interest to you; and
- in connection with our integration with "social media" services e.g. via third-party social media cookies, or when you share information using a social media sharing button or "like" button on our Website or you link your account or engage with our content on or through a social networking website such as Facebook or Instagram.

Third parties may have access to information collected via cookies or web beacons on our websites. We, or these third-party providers, may be able to use these technologies to identify you across platforms, devices, sites, and services. Social Media companies and third parties engaged in Targeted Advertising are third party controllers and may have their own privacy policies and their processing is not subject to this Policy. For a list of current third party providers, please view the cookie list in our Cookie Preferences tool.

For further information on how we use tracking technologies for analytics and advertising, and your rights and choices regarding them, please see the "Your Rights and Choices" sections below.

Posts and Social Media

We process Account Credentials, Inference Data, Contact Identifiers, and User Content you post (e.g. comments, social media posts, etc.) on accounts we operate on third party social media platforms (e.g. company pages). We also process Account Credentials, Contact Identifiers, and User Content if you interact with or identify us on social media platforms (e.g. if you post User Content that engages with or tags our official accounts).

We process this Personal Data for our Business Purposes and Targeted Advertising (which may involve data sales or "sharing" under US law).

Marketing Communications

We process Device/Network Data/Activity, Contact Identifiers, Account Credentials, and Inference Data in connection with marketing communications (e.g. emails, , or similar communications) and (subject to your consent where required) when you open or interact with those communications ("Marketing Communications").

You may receive Marketing Communications if you consent and, in some jurisdictions where permitted by law, as a result of account registration or other inquiry or transaction that allows us to send Marketing Communications without consent.

We process this Personal Data to contact you about relevant products or services and for our Business Purposes. We may also use Device/Network Data/Activity, Contact Identifiers, Account Credentials, and Inference Data for our Targeted Advertising (which may involve data sales or "sharing" under US law).

You can withdraw your consent to receive Marketing Communications by clicking on the unsubscribe link in an email (for email), by responding with "opt-out" or other supported unsubscribe message (for SMS), or for other communications, by contacting us using the information above. To opt-out of the collection of information relating to email read receipts, configure your email so that it does not load images in our emails. See the "Rights and Choices" and any applicable "Additional Information" sections below for more information about this processing.

We do not share Contact Identifiers collected as part of SMS marketing campaigns with third parties for their own marketing or Commercial Purposes unless you elect to receive such SMS communications from those third parties.

Feedback and Surveys

We process Account Credentials, Contact Identifiers, and User Content collected in connection with feedback surveys or questionnaires. We process this Personal Data as necessary to understand and improve our service offerings, respond to feedback, and other legitimate interests, such as evaluating or improving our products and services and to assess customer and client satisfaction, and for our other Business Purposes. In some cases, we may

share create and share aggregated data with clients, partners and service providers, who may use it for their own purposes.

Contests and Promotions

We collect and process Account Credentials, Inference Data, certain Contact Identifiers, and User Content when you enter a contest/sweepstakes or take part in a promotion. If you are a winner of a contest, sweepstakes, or certain other promotions, we may (where permitted by law) collect Government ID Data.

We process this Personal Data as necessary to provide the contest/promotion, notify you if you have won, or to process delivery of a prize, for our Business Purposes, and other legitimate interests, such as:

- verifying your identity for authentication, anti-fraud, and security purposes (in which case we may process Government ID Data to complete verification);
- to improve our services and to create a personalized user experience; and
- to contact you about relevant products or services, and in connection with Marketing Communications and Targeted Advertising.

If you win a special promotion (e.g., a sweepstakes), your acceptance of a prize may allow us to make certain Personal Data public, e.g. posting your first name and last initial, hometown and/or state on a winner's list (or making physical copies of the winner's list available, upon request or as required by law). See the special program agreement(s) for additional details and terms.

We may process Account Credentials, Contact Identifiers, and User Content information for our Commercial Purposes (which may include Targeted Advertising or the use of Consumer Profiles, and which may involve data sales or "sharing" under US law). See the Additional Information sections section for information regarding this processing in your jurisdiction. We do not sell, "share," or process Government ID Data for any Commercial Purposes or any Business Purposes not permitted under applicable law.

Contact Us

We collect and process Account Credentials, Contact Identifiers, and User Content when you contact us, e.g. through a contact us form. We process this Personal Data to respond to your request, and communicate with you, as appropriate, and for our Business Purposes. If you consent or if permitted by law, we may use Account Credentials and Contact Identifiers to send you Marketing Communications and for Targeted Advertising (which may include targeted advertising or the use of Profiles, and which may involve data sales or "sharing" under US law). See the "Additional Information" sections for information regarding this processing in your jurisdiction.

Professional Engagements

We process Account Credentials, Contact Identifiers, Government ID Data, Employment Data, User Content, and Payment Data in connection with your application for employment or to become an independent contractor for Ruder Finn.

We process this Personal Data as necessary to evaluate the potential professional relationship, including, but not limited to, to conduct interviews, background checks, or evaluate applications. We may also process this Personal Data for human resources purposes, such as managing identity and credentials (for job applicant accounts), for travel reimbursement, or analyzing and consolidated reporting. We may further process Personal Data in this context for our Business Purposes. We do not sell or share Personal Data processed in this context. We process Sensitive Personal Data only for Business Purposes permitted under applicable law.

SPECIFIC PROCESSING PURPOSES

Business Purposes

We and our Service Providers process Personal Data for the following Business Purposes:

Service Delivery

We process Personal Data as necessary to provide our Websites and our other services. For example, we process Personal Data to authenticate users and their rights to access the Website or as otherwise necessary to fulfill our contractual obligations to you, provide you with the information, features, and services you request, and create relevant documentation.

Internal Processing and Service Improvement

We may use any Personal Data we process through our Website as necessary in connection with our legitimate interests in improving the design of our Website, understanding how our Website is used or function, for customer

service purposes, for internal research, technical or feature development, to track use of our Website, QA and debugging, audits, and similar purposes.

Security and Incident Detection

We may process Personal Data in connection with our legitimate interest in ensuring that our Website is secure, identify and prevent crime, prevent fraud, and verify or authenticate users/individuals, and ensure the safety of our guests. Similarly, we process Personal Data as necessary to detect security incidents, protect against, and respond to malicious, deceptive, fraudulent, or illegal activity. We may analyze network traffic, device patterns, and characteristics, maintain and analyze logs and process similar Personal Data in connection with our information security activities.

Aggregated Data

We process Personal Data in order to identify trends, including to create aggregated and anonymized data about buying and spending habits, use of our Website, and other similar information ("**Aggregated Data**"). Aggregated Data that does not contain Personal Data is not subject to this Privacy Policy.

Compliance, Health & Safety

We may also process Personal Data as necessary to comply with our legal obligations, such as where you exercise your rights under data protection law, for the establishment and defense of legal claims, where we must comply with requests from government or law enforcement officials, and as may be required to meet national security or law enforcement requirements or prevent illegal activity. We may also process data to protect the vital interests of individuals to the extent required or permitted under applicable law. Please see the "How We Share Personal Data" section for more information about how we disclose Personal Data in extraordinary circumstances.

Targeted Advertising

We and our third party advertising providers may engage in display advertising or place advertisements on third-party sites, including, but not limited to, social media platforms. Such advertising may involve the processing of Personal Data in order to tailor the advertisements you see based on your interests or activity across unrelated websites ("**Targeted Advertising**"). The profiles and interests used for Targeted Advertising may be inferred or derived from Personal Data that we or those third parties obtain or infer from your activities across non-affiliated websites, applications, or services (e.g. through cookies and other tracking technologies). These third parties, including, but not limited to, Google and Facebook, may use data collected via cookies and/or device identifiers to collect Personal Data such as unique IDs, IP addresses, OS/browser type, and other similar data, as well as information about your visits to our site and the ads you see and view to develop and assess aspects of a consumer profile, to deliver more relevant advertisements and offers, and to determine whether and how ads you see are effective. Note that Targeted Advertising may be provided by our services providers and third party data controllers. These parties may be able to identify you across sites, devices, and over time. In some cases, these third parties may build or augment user profiles using your Personal Data, and may track whether you view, interact with, or how often you have seen an ad, or whether you purchased advertised goods or services.

Disclosure of Information

We disclose information we collect in accordance with the practices described in this Privacy Policy. The categories of persons to whom we disclose information include:

Service Providers

We disclose information to service providers that process information on our behalf. Service providers assist us with services such as, data analytics, marketing and advertising, website hosting, and technical support. To the extent required by law, we contractually prohibit our service providers and contractors from retaining, using, or disclosing information about you for any purpose other than performing the services for us, although we may allow our service providers to process Personal Data for their own business purposes, except as prohibited by applicable law.

Third-Party Vendors and Related Parties

Some of the third parties we work with independently control the purposes and means of processing your information. For example, we disclose information to vendors that provide analytics, security, and fraud prevention services for us. We also disclose information to ad networks, technology providers, and other third parties to help provide targeted advertising. For more information on analytics and advertising, see the "Your Privacy Choices" section below.

Affiliates
We disclose information with our affiliates and related entities, including where they act as our service providers or for their own internal purposes.

Partners
We disclose information with our partners in connection with offering co-branded services, selling or distributing our products, or engaging in joint marketing activities.

Clients
We disclose information with our business clients when it is relevant to the services we are providing to those clients. Our clients are independent entities and their processing of information is subject to their own privacy policies.

Promotions
In partnership with certain clients, we may operate contests, sweepstakes or other promotions, which require registration in order to enter. In such case, your information may be used by us to contact you for winner notification, prize delivery confirmation or other promotional purposes. Your entry in the contest or sweepstakes may, except where prohibited by law, result in your being added to our mailing lists as well as those of our promotional partners or clients associated with the contest or sweepstakes. Acceptance of a prize may require you (unless prohibited by law) to allow us to post publicly some of your information on the Website, such as in social media or on a winner's page, in the event you win a contest or sweepstakes. Additional terms may apply.

Merger or Acquisition
We disclose information in connection with, or during negotiations of, any proposed or actual merger, purchase, sale or any other type of acquisition or business combination of all or any portion of our assets, or transfer of all or a portion of our business to another business.

Security and Compelled Disclosure
We disclose information to comply with the law or other legal process, and where required, in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We also disclose information to protect the rights, property, life, health, security and safety of us, the Website or anyone else.

As you Request
We disclose information at your request or direction.

Consent
We disclose information with notice to you and your consent

Members of the Media, Social Media Influencers/Users, Subject Matter Experts, Stakeholders
Ruder Finn maintains lists of publicly available information regarding media contacts, journalists, social media influencers, social media users, subject matter experts and other stakeholders and individuals who make their personal and/or professional information and/or opinions publicly available. These lists are accessed and/or used by Ruder Finn for specific business purposes in conducting its own business and in conducting business on behalf of potential and existing clients. Ruder Finn takes reasonable measures to limit the information processed to be relevant to legitimate business purposes and to minimize any risks to individuals associated with the use of such information.

Other Disclosures
Notwithstanding the above, we may disclose publicly available information (as that term is defined by applicable law) or information that does not identify you (including information that has been aggregated or de-identified as those terms are defined by applicable law) except as prohibited by applicable law. For information on your rights and choices regarding how we share information about you, please see the "Your Rights and Choices" section below.

Your Rights and Choices

Your Rights
Any individual may contact us to access, update and/or restrict use of such information consistent with applicable law by contacting us at privacy@ruderfinn.com.

In addition to the rights and choices in this section, you may have additional rights based on where you reside. If you are a resident of the U.S., see our "California and other US States" section below for more information. If you are

located in the EEA, Switzerland, or the UK, please review the "Additional Information" sections below for more information.

Your Choices

The following describes certain options available to you with respect to the information collected via the Websites:

Cookies and Pixels

Most browsers accept cookies by default. You can instruct your browser, by changing its settings, to decline or delete cookies. If you use multiple browsers on your device, you will need to instruct each browser separately. Your ability to limit cookies is subject to your browser settings and limitations.

Please be aware that if you disable or remove tracking technologies some parts of the Website may not function correctly. Please note the above opt outs only apply to the specific browser or device from which you opt out. We are not responsible for the effectiveness of any opt outs offered by other entities.

Do Not Track

Your browser settings may allow you to automatically transmit a "Do Not Track" signal to online services you visit. We do not monitor or take action with respect to "Do Not Track" signals.

Global Privacy Control (GPC)

Our Website may support certain automated opt-out controls, such as the Global Privacy Control ("GPC"). GPC is a specification designed to allow Internet users to notify businesses of their privacy preferences, such as opting-out of Targeted Advertising or the sale/sharing of Personal Data. To activate GPC, users must enable a setting or use an extension in the user's browser or mobile device. Please review your browser or device settings for more information regarding how to enable GPC.

Analytics and Advertising Choices.

Some third parties we work with offer their own opt-out tools related to information collected through cookies and pixels. To opt out of your information being used by Google Analytics, visit https://tools.google.com/dlpage/gaoptout.

Some third parties we work with follow the Digital Advertising Alliance's Self-Regulatory Principles for Online Behavioral Advertising, which offers its own opt-outs tools for targeted advertising. For details, visit https://youradchoices.com/control.

Please note that the above opt outs will only apply to the specific browser or device from which you opt out. We are not responsible for the effectiveness of, or compliance with, any opt out options or programs, or the accuracy of any other entities' statements regarding their opt out options or programs.

As indicated above, vendors and other parties may act as our service providers, or in certain contexts, independently decide how to process your information. We encourage you to familiarize yourself with and consult their privacy policies and terms of use.

Marketing Communications Choices

You can opt-out of receiving promotional emails from us at any time by following the unsubscribe instructions at the bottom of the emails, or emailing us at the email address set out in the "How to Contact Us" section below with the word UNSUBSCRIBE in the subject field of the email. Please note that you cannot opt-out of transactional emails, such as those about your transactions, servicing, or our ongoing business relations. Please note that your opt out is limited to the email address used and will not affect subsequent subscriptions.

Data Security

Ruder Finn uses reasonable administrative, technological, physical and other measures to help protect your information from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction, taking into due account the risks involved in the processing and the nature of the Personal Data. However, due to the nature of the Internet and related technology, transmission via the internet is not completely secure and we cannot guarantee the security of your Personal Data and Ruder Finn expressly disclaims any such guarantee.

International Transfer

We are based in the U.S. and the information we collect is governed by U.S. law. If you are accessing the Website from outside of the U.S., please be aware that information collected through the Website may be transferred to, processed,

stored, and used in the U.S. and other jurisdictions. Data protection laws in the U.S. and other jurisdictions may be different from those of your country of residence. Your use of the Website or provision of any information therefore constitutes your consent to the transfer to and from, processing, usage, disclosure, and storage of information about you in the U.S. and other jurisdictions as set out in this Privacy Policy. Where required by applicable law, we will provide appropriate safeguards for data transfers, such as through use of standard contractual clauses.

Children

The Websites are not intended for use by individuals under 18 years of age. Ruder Finn will not knowingly collect or maintain Personal Data from minors. If you are a parent and believe that we may have collected Personal Data from a minor, please contact us so that we may take appropriate measures to investigate and delete such information, if appropriate.

Notification of Changes

As we provide more services and/or functionality on our Website and as privacy laws and regulations evolve, it may be necessary to revise or update our Privacy Policy. We will endeavor to put an "Updated" note on the link to the Privacy Policy on the Website's home page so that you will be able to check regarding changes which may be of particular relevance to you. Your continued use of our Websites indicates your consent to the Privacy Policy then posted. If the changes are material, we may provide you with additional notice to your email address.

How to Contact Us

If you ever have any questions about this privacy policy, or experience any difficulty accessing the information in this privacy policy, please contact us at privacy@ruderfinn.com.

California and other US States

This section applies to residents of California and any Consensus State. A "Consensus State" is any U.S. state that has adopted a comprehensive privacy law. For purposes of this policy, Consensus States include Colorado, Connecticut, Delaware, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, and Virginia. This section does not apply to residents of other states except as expressly provided herein.

Notice at Collection

Our data practices are as follows:

Collection

In the past 12 months, we have collected the categories of personal information set out in the "Categories and Sources of Personal Data" section above.

Sources

The categories of sources from which we collect personal information are set out in the Categories and Sources of Personal Data" section above.

Purpose

The specific purposes (including business and commercial purposes) for collecting and using personal information are set out in the "Specific Processing Purposes" section above.

Categories of Personal Data Disclosed for Business Purposes

In the preceding 12 months we have disclosed the following categories of Personal Data for "business purposes" to the following categories of recipients:

Category of Personal Data	Category of Recipients

Contact Data; Device/Network Data; Identity Data; Inference Data; General Location Data; User Content	Affiliates; Service Providers; Public Disclosures; Event Partners, Data Aggregators; Successors; Lawful Recipients
Sensitive Personal Data	Affiliates; Service Providers

Sales, Shares, and Targeted Advertising.
Some of our disclosures of personal information to third parties may be considered a sale or share for cross-contextual behavioral advertising purposes under applicable law. We may also process your personal information for purposes of targeted advertising as defined by applicable law. The categories of personal information we sell, share, or process for targeted advertising purposes include:

Category of Personal Data	Category of Recipients
Contact Data; Device/Network Data; Identity Data; Inference Data; General Location Data; User Content	Service Providers; Social Media Platforms; Data Aggregators; Public Disclosures; Third Party Vendors and related parties

We do not sell or share the personal information of consumers we know are under 16 years old.

Categories of Sensitive Personal Data Used or Disclosed
We may use or disclose the following categories of Sensitive Personal Data: Government ID Data and Payment Data. However, we do not sell or "share" Sensitive Personal Data to third parties.

Retention
We retain information for the length of time that is reasonably necessary for the purpose for which it was collected, and as necessary to comply with our legal obligations, resolve disputes, prevent fraud, and enforce our agreements.

Language Models
We do not collect or use personal data to train large language models. However, when we sell personal data to third parties, they may use the data to train their own large language models. See their privacy policies for details.

RIGHTS

This section sets out your rights. See "Submission of Requests" below for details on how to exercise your rights.

Verifiable Rights.

For California residents you have the right to:

Confirm
Right to confirm whether we process your Personal Data.

Access/Know
Right to request any of following: (1) the categories of Personal Data we have collected, sold/"shared," or disclosed for a commercial purpose; (2) the categories of sources from which your Personal Data was collected; (3) the business or commercial purposes for which we collected or sold/"shared" your Personal Data; (4) the categories of third parties to whom we have disclosed or sold/"shared" your Personal Data, or disclosed it for a business purpose; and (5) the specific pieces of Personal Data we have collected about you. Portability
Right to request that we provide certain Personal Data in a common, portable format. Deletion
Right to delete certain Personal Data that we hold about you. Correction
Right to correct certain Personal Data that we hold about you.

For Consensus State Residents, you have the right to:

Confirm
Right to confirm whether or not we are processing your personal information, and in some regions, confirm the categories of personal information we have processed.

Access
Right to access your personal information.

Correction
Right to correct inaccuracies in your personal information.

Deletion
Right to delete your personal information.

Obtain a copy of your personal information
Right to obtain a copy of your personal information that you previously provided to us in a portable and readily usable format.

Minnesota and Oregon
For Minnesota and Oregon residents, you also have the right to obtain a list of the specific third parties to which we have disclosed personal information.

Delaware or Maryland residents,
For Delaware and Maryland residents, you also have the right to obtain a list of categories of third parties to which we have disclosed your personal information.

Connecticut and Rhode Island residents
For Connecticut and Rhode Island residents, you also have the right to obtain a list of the specific third parties to which we have sold personal information.

Opt-Out (Sales, Sharing, Targeted Advertising, Profiling)

Right to opt-out of the following:

- If we engage in sales or shares of data (as defined by applicable law), you may direct us to stop selling Personal Data.
- If we engage in Targeted Advertising (aka "sharing" of personal data or cross-context behavioral advertising,) you may opt-out of such processing.
- If we engage in certain forms of "profiling" (e.g. profiling that has legal or similarly significant effects), you may opt-out of such processing.

Non-Discrimination

You have the right to not to receive discriminatory treatment as a result of your exercise of rights conferred by applicable law.

Authorized Agents

You may exercise your rights through an authorized agent.

Revocation of Consent

You have the right to revoke consent previously given to us that we rely on to process your personal information. If you withdraw consent, you may not be able to receive certain services dependent on that consent.

Appeals

You have the right to appeal our decision in response to your requests.

Submission of Requests

You may submit requests, as follows (please our review verification requirements section). If you have any questions or wish to appeal any refusal to take action in response to a rights request, contact us at privacy@ruderfinn.com. We will respond to any request to appeal within the time period required by law.

Access/Know, Confirm Processing, Portability, Deletion, and Correction	You may or email us at privacy@ruderfinn.com, together with your email address, phone number or address on file, along with your request.
Opt-Out of Sales, "Sharing," Targeted Advertising or Profiling Opt-out	We do not typically associate information collected through tracking technologies on our website with other information in our systems. As a result you may need to submit one opt out for information collected through tracking technologies, such as cookies, and a separate opt out for other information in our systems, like your email address. For information in our systems, please submit a request through our form here. You may disable Targeted Advertising as described in the Cookies and Similar Technology Choices section above. Global Privacy Control (GPC) to opt out of Targeted Advertising/"sharing". Website supporting GPC (or similar standards) will treat the request as a request to opt-out of Targeted Advertising/"sharing" on the device where the GPC setting is active.
List of Direct Marketers	Contact us via email to our privacy team at privacy@ruderfinn.com.

Revocation of Consent.

To revoke consent, write us at privacy@ruderfinn.com or the "How to Contact Us" section above (specifying the consent your wish to withdraw). If you withdraw consent, you may not be able to receive services related to that consent.

Authorized Agents

Authorized agents must submit requests through the specific methods designated herein. Except where prohibited by law, we will require written and signed proof of the agent's permission.

Appeals

To appeal, write us at the email or postal address set out in the "How to Contact Us" section above and specify what you wish to appeal. We will review and respond to your appeal in accordance with applicable law. If we deny your appeal, you may submit a complaint to your Attorney General as follows: Colorado, Connecticut, Delaware, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, Virginia.

Limitations

Your rights are subject to exceptions and our data retention practices. To the extent permitted by law, rights requests must be exercised through the applicable designated method specified herein.

Additional California Disclosures

Shine the Light

If you are a California resident and have an established business relationship with us, you have the right to request a list of the categories of personal information (as defined by Shine the Light) disclosed by us to third parties for their own direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of such third parties. To exercise this right, write us at the email or postal address set out in the "Howe to Contact US" section above and specify that you are making a "California Shine the Light Request." We will respond to requests received in accordance with Shine the Light.

Additional Disclosures for Nevada

For Nevada residents, you have the right to opt-out of sales of your personal information to third parties. To exercise your right, following the opt-out process in "Submission of Requests" section above. Your rights are subject to exceptions and our data retention practices.

Additional Information: European Economic Area, United Kingdom, and Switzerland

The General Data Protection Regulation ("**GDPR**") provides additional rights to individuals located in the European Economic Area, Switzerland, and the United Kingdom, (collectively, "**Europe**"). This section addresses those rights and applies only to those individuals.

Controller

Data protection laws in Europe distinguish between organizations that process personal data for their own purposes (known as "controllers") and organizations that process personal data on behalf of other organizations (known as "processors"). Ruder Finn acts as a controller with respect to personal data collected as you interact with our Website. In some instances, Ruder Finn acts a processor on behalf of a client, which is the controller. This Policy does not apply to data that we process as a processor. Any questions that you have relating to the processing of personal data by Ruder Finn as a processor should be directed to the relevant client.

Your Rights

Residents of the EU/EEA, UK, and Switzerland have the following rights. Please review our verification requirements. Applicable law may provide exceptions and limitations to all rights.

Access
You may have a right to access the Personal Data we process.

ConsentTo the extent we rely on your consent to process Personal Data, you may withdraw your consent at any time. We may continue processing on alternative or additional legal bases. Withdrawal of consent does not affect the lawfulness of processing undertaken prior to withdrawal.

Deletion
You may request that we delete your Personal Data. We may delete your data entirely, or we may anonymize or aggregate your information such that it no longer reasonably identifies you.

Data Export
You may request that we send you a copy of your Personal Data in a common portable format of our choice.

Fate of your data
If you live in France, you have the right to set guidelines for your Personal Data after your death.

Restriction
You may request that we restrict the processing of Personal Data to what is necessary for a lawful basis.

Objection
You may have the right under applicable law to object to any processing of Personal Data based on our legitimate interests. We may not cease or limit processing based solely on that objection, and we may continue processing where our interests in processing are appropriately balanced against individuals' privacy interests. In addition to the general objection right, you may have the right to object to processing:

- for profiling purposes (if any);
- for direct marketing purposes (we will cease processing upon your objection); and
- involving automated decision-making with legal or similarly significant effects (if any).

Rectification
You may correct any Personal Data that you believe is inaccurate.

Regulator Contact
You have the right to file a complaint with regulators about our processing of Personal Data. To do so, please contact your local data protection or consumer protection authority.

Submission of Requests

To exercise any of these rights, please contact us as set out in the "How to Contact Us" section below and specify which right you are seeking to exercise. We will respond to your request within 30 days. We may require specific information from you to help us confirm your identity and process your request. If personal data about you has been processed by us as a processor on behalf of a client and you wish to exercise any rights you have with such personal data, please inquire with our client directly. If you wish to make your request directly to us, please provide the name of our client on whose behalf we processed your personal data. We will refer your request to that client, and will support them to the extent required by applicable law in responding to your request.

Please note that we retain information as necessary to fulfil the purposes for which it was collected, and may continue to retain and use information even after a data subject request for purposes of our legitimate interests, including as necessary to comply with our legal obligations, resolve disputes, prevent fraud, and enforce our agreements. You also have the right to lodge a complaint with the data protection regulator in your jurisdiction (see http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm for contact information).

Lawful Basis for Processing

The following table summarizes our processing of Personal Data, the purposes of processing (and corresponding legitimate interests, if applicable.) For additional detail, please review the corresponding sections in this Policy.

Processing	Categories of Data	Description of processing	Legal basis
Our Websites	Device/Network Data, Contact Data, Identity Data, General Location Data, and Inference Data	Operating and delivering our Website. If you do not use these services or provide the data, you may not be able to use our Website.	Performance of Contract (Art. 6.1(b) GDPR)
		Ensuring the security of our websites, mobile applications and other technology systems	Legitimate Interests (IT security) (GDPR Art. 6(1)(f))
		Analyzing the use of our Website, including navigation patterns, clicks, etc. to help understand and make improvements to the Website	Legitimate Interests (improving products and services) (GDPR Art. 6(1)(f))
		Business Purposes*	See below
		Targeted Advertising**	
Cookies and other tracking technologies	Identity Data, Device/Network Data, Contact Data, Inference Data, General Location Data	Operating our Site. If you do not allow the collection of this data, you may not be able to use our Site or certain features.	Performance of Contract (Art. 6.1(b) GDPR)
		Using cookies for functional purposes, analytics, targeted advertising, integration with social media	Consent (GDPR Art. 6(1)(a))
		Business Purposes*	See below
		Targeted Advertising**	
Posts and social media	Identity Data, Inference Data, Contact Data, and User Content	Reposting social media posts on our social media pages and Website	Legitimate Interests (improving external communication) (GDPR Art. 6(1)(f))
		Business Purposes*	See below
		Targeted Advertising**	
Marketing communications	Device/Network Data, Contact Data, Identity	Sending you Marketing Communications	Consent (GDPR Art. 6(1)(a))
		Obtaining read receipts	Consent (GDPR Art. 6(1)(a))

	Data, and Inference Data	Business Purposes*	See below
		Targeted Advertising**	
Contests and promotions	Identity Data, Inference Data, certain Contact Data, and User Content	Providing, managing, and operating the contest/promotion, notify you if you have won, or to process delivery of a prize. If you do not provide this data, you may not be able to enter a contest or obtain any reward/prize.	Performance of Contract (Art. 6.1(b) GDPR)
		Business Purposes*	See below
	Identity Data, Contact Data, and User Content	Targeted Advertising**	Consent (GDPR Art. 6(1)(a))
	Government ID Data	Reporting taxes and verifying your identity	Compliance with legal obligations (GDPR Art. 6(1)(c))
Feedback and Surveys	Identity Data, Contact Data, and User Content	To conduct they survey or correspond with you about feedback	Legitimate Interests (improving products and services) (GDPR Art. 6(1)(f))
		Business Purposes*	See below
Contact Us	Identity Data, Contact Data, and User Content	Responding to requests and communicating with consumers. If you do not provide this data, we may not be able to support or contact you.	Performance of Contract (Art. 6.1(b) GDPR)
		Business Purposes*	See below
	Identity Data and Contact Data	Targeted Advertising**	
Professional Engagement	Identity Data, Contact Data, Government ID Data, Biographical Data, User Content, Payment Data, Health Data	As necessary to evaluate, establish, and maintain the professional relationship, including, but not limited to, to conduct background checks, to provide employment benefits, and for financial administration.	Performance of Contract (Art. 6.1(b) GDPR)
		For human resources purposes, such as managing identity and credentials, administering security and loss prevention, or analyzing and consolidated reporting.	Compliance with legal obligations (GDPR Art. 6(1)(c)).
		Business Purposes*	See below
Business Purposes			
Service Delivery	Contact Data; Device/Network Data; Identity Data; Inference Data; General Location Data; Sensitive Personal Data; User Content	Delivering the Website, features or products you request when you agree to use our Website or make a purchase. If you do not provide relevant data, you may not be able to use our Website.	Performance of Contract (GDPR Art. 6.1(b))
Internal Processing and Service Improvement		Improving the design of our Website, understanding how our Website are used or function, for customer service purposes, internal research, technical or feature development, to track use	Legitimate Interests (improving products and services; direct marketing; security of products and services; improving

		of our Website, QA and debugging, audits, and similar purposes.	external communications; marketing and analysis of business operations) (GDPR Art. 6(1)(f))
Security and Incident Detection		Ensuring that our Website are secure, identify and prevent crime, prevent fraud, and verify or authenticate users/individuals, and ensure the safety of our guests.	
Aggregated Data		Creating aggregated and anonymized data about buying and spending habits, use of our Website, and other similar information to learn about how our Website perform and what is relevant to our users.	
Compliance, Health, Safety, Public Interest		Processing data to protect vital interests, e.g. in connection with event emergencies or personal injuries.	Vital Interests (GDPR Art. 6(1)(d));
		Complying with our legal obligations, e.g. establishment and defense of legal claims, government/law enforcement requests, national security or law enforcement requirements.	Compliance with legal obligations (GDPR Art. 6(1)(c)).
Targeted Advertising			
Targeted Advertising		Serving and delivering personalized/retargeted online advertisements. If you do not consent, you may see less relevant advertisements.	Consent (GDPR Art. 6(1)(a))
Disclosures			
Affiliates	Contact Data; Device/Network Data; Identity Data; Inference Data; General Location Data; User Content	Disclosing data to our affiliates and related companies to ensure efficient operation of our Website, operate our global technology services, support, and similar operational matters.	Legitimate Interests (improving products and services) (GDPR Art. 6(1)(f))
Service Providers		Disclosing data to processors to ensure efficient and effective operation of our Website, operate our global technology services, support, and similar operational matters.	
Successors		Disclosing data to successors as part of our corporate and management activities.	Legitimate Interests (corporate management) (GDPR Art. 6(1)(f))
Data Aggregators	Contact Data; Device/Network Data; Identity Data; Inference Data; General Location Data; User Content	Disclosure of data aggregators to obtain supplemental profile information to deliver more relevant content and advertising	Consent (GDPR Art. 6(1)(a))
Social Media Platforms		Disclosure of information to advertisers to deliver more relevant ads and to direct relevant advertisements to users across platforms and services	

Lawful Recipients	Contact Data; Device/Network Data; Identity Data; Inference Data; General Location Data; Sensitive Personal Data; User Content	Disclosing data to protect vital interests, e.g., in connection with event emergencies or personal injuries	Vital Interests (GDPR Art. 6(1)(d));
		Disclosing data as part of our legal obligations, e.g. establishment and defense of legal claims, government/law enforcement requests, national security or law enforcement requirements	Compliance with legal obligations (GDPR Art. 6(1)(c)).

International Transfers

We process data in the United States, and other countries where our subprocessors are located. In cases where we transfer Personal Data to jurisdiction that have not been determined to provide "adequate" protections by your home jurisdiction, we will put in place appropriate safeguards to ensure that your Personal Data are properly protected and processed only in accordance with applicable law. Those safeguards may include the use of EU standard contractual clauses, reliance on the recipient's Binding Corporate Rules program, the EU-U.S. Data Privacy Framework, UK Extension, and Swiss-U.S. Data Privacy Framework, or requiring the recipient to certify to a recognized adequacy framework. You can obtain more information about transfer measures we use for specific transfers by contacting us using the information above.