



RUDER FINN PRIVACY POLICY

As of April 1, 2020

Ruder Finn, Inc. and all U.S. based offices operating under the Ruder Finn Group of companies (collectively referred to as “**Ruder Finn**” in this privacy policy).

At Ruder Finn, we are strongly committed to protecting privacy. As part of our commitment, we strive to protect the privacy of visitors to the sites that we operate (collectively, the “Website(s)”). By using this Website and submitting any personal information, you agree to the use by Ruder Finn of such data in accordance with this privacy statement.

In this digital world, privacy is important to Ruder Finn and should be important to you. Ruder Finn believes in transparency and we provide this notice so that you can understand our online information practices and the choices you can make about the way your information is collected and used.

The Information We Collect and Process:

Ruder Finn collects and processes two basic types of information:

- a. Personally identifiable information:** This is *any* information that personally identifies one individual from another or enables you to be individually contacted or identified. This information is used by us for the purpose of responding to user submissions and fulfilling requests for further information about our public relations services, as well as in connection with job applications.
- b. Aggregate user and tracking information:** This information gives us insights on how Website visitors use our Website. This data has been modified so that it is anonymous and does not contain any personally identifiable information. We use this information to ensure that our Website, e-mails and marketing efforts continue to appeal to Website visitors, clients and potential clients.

Collection of Data/Information by Ruder Finn:

Ruder Finn collects personally identifiable information which is specifically and voluntarily provided by visitors to Ruder Finn's website. In addition, Ruder Finn may combine information collected through means such as cookies or third-party analytics tools with personal information maintained by Ruder Finn. Ruder Finn may collect certain personally identifiable information, such as name, job title, and company name, address, email address, telephone and fax numbers, from website visitors.

A visitor may choose to provide personal information in the following examples: (i) subscribing to or ordering newsletters and/or publications; (ii) submission of resumes or work history information; (iii) participate in "join our mailing list" initiatives; (iv) participate in bulletin boards, discussion or message forums; (v) enter or participate in surveys or quizzes; register for events and conferences; (v) contact us for further information; and (vi) visiting our Website(s) while logged into a Social Media platform.

Demographic information, including gender and occupation, is not actively sought, but may be submitted when a visitor responds to an online job application. It is Ruder Finn's policy to limit the information collected to only the minimum information required to complete a visitor's request. If a visitor believes the Website has collected excessive information, we encourage the visitor to contact us at privacy@ruderfinn.com to raise any concerns.

Other information Ruder Finn Collects and/or Processes by Automated Means:

Our Website may use technologies such as “cookies” to provide visitors with tailored information upon each visit. Cookies are a common part of many commercial websites that allow small text files to be sent by a website, accepted by a web browser and then placed on your hard drive as recognition for repeat visits to the Website. Every time you visit the Website, our servers, through cookies, pixels and/or GIF files, collect basic technical information such as your domain name, the address of the last URL visited prior to clicking through to the Website, your browser and operating system and your Internet Protocol (“IP”) address. We also use third party analytical tools (e.g. Google Analytics) to analyze activities on the Website and use of the Website. You do not need to enable cookies to visit the Website; however, some parts of the Website and some services may be more difficult or impossible to use if cookies are disabled. Some Ruder Finn cookie files will remain on your computer’s hard drive unless and until you manually delete the file.

The Way We Use Information:

We store the personal information you provide on secure servers in order to provide you with the information and/or services you request and may be used to provide you with additional information about our services we believe may be of interest to you. The information is stored for a period of time and in a manner relevant to responding to your request, unless you request that it be removed. The information you provide us may be shared with Ruder Finn employees and service providers only to the extent necessary to administrate our systems and/or accommodate your request. Our Website(s) do not collect or compile personally identifying information for dissemination or sale to outside parties for consumer marketing purposes, or host mailings on behalf of third parties.

We use non-identifying and aggregate information about the use of the Website to improve the navigation, content, and design of the Website. This information may include, for example, the most and least requested pages, analyzing traffic regarding specific features, and the number of users from the U.S. and other countries, among other things.

Ruder Finn complies with the Privacy Shield Principles for all onward transfers of personal data from the EU and Switzerland, including the onward transfer liability provisions. When personal information is transferred to outside service providers, it is done under a contract which requires the companies to use the shared information only for the limited purposes for which it is provided to them in providing services to Ruder Finn, and to agree to hold the information securely and confidentially in accordance with this privacy policy, applicable law and any applicable Privacy Shield privacy principles (see “*Users Located in European Union and Switzerland*” below).

Promotions:

In partnership with certain clients, we may operate contests, sweepstakes or other promotions through the Website, which require registration in order to enter. In such case, your personally identifiable 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 also 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.

Exceptions:

Ruder Finn may preserve and has the right to disclose any information about you or your use of the Website without your prior permission if Ruder Finn has a good faith belief that such action is necessary to: (a) protect and defend the rights, property or safety of Ruder Finn or its clients or their respective partners, employees, affiliates, other users of the Website, or the public; (b) enforce the Terms of Use for the Website; or (c) respond to claims related to your use of the Website. We may also disclose information as we deem necessary to satisfy any

applicable law, regulation, legal process or lawful governmental request (including to meet national security or law enforcement requirements through subpoena, search warrant or other legal process) or in the event of a sale or potential sale of Ruder Finn or one of its business units.

Data Security:

Ruder Finn understands that the safety of your personal information is extremely important to you. Accordingly, Ruder Finn uses reasonable technological, physical and other measures to keep your information protected from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into due account the risks involved in the processing and the nature of the personal information. However, due to the nature of the Internet and related technology, we cannot guarantee the security of your personal information and Ruder Finn expressly disclaims any such guarantee.

Children's Privacy:

Ruder Finn understands the need to protect the privacy of children. The Website is not intended for use by individuals under 13 years of age. Ruder Finn will not intentionally collect or maintain personal information from children under the age of 13 on our Website. If you believe that we may have collected personal information someone under the age of 13 or from a minor as may otherwise be defined, please contact us so that we may take appropriate measures to investigate and delete such information, if appropriate.

How You Can Access or Correct Your Information:

You may access, update or remove the information you provided to us by contacting us – see “**How to Contact Us**” below. To protect your privacy and security, we will also take reasonable steps (including seeking additional information or documentation) to verify your identity before updating or removing your information. Upon receiving your email with the request to update or remove your information, our privacy team will log the receipt of your request and will contact the appropriate data holder within the company in order to enable them to process your request. The information you provide us may be archived or stored periodically by us according to backup processes conducted in the ordinary course of business. Information stored as part of this backup process will be deleted in due course on a regular schedule.

Links to Other Websites:

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.

International Users:

Information provided through this Website may be uploaded to a cloud and transferred to or accessed globally. By providing information to this Website, you consent to the transfer, processing and/or use of the information globally throughout Ruder Finn. Wherever the information is transferred or accessed within Ruder Finn it will be processed and used in accordance with this privacy policy and all applicable laws.

Users Located in the European Union and Switzerland:

Ruder Finn complies with the EU - U.S. Privacy Shield Framework and the Swiss – U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use and retention of personal information transferred from the European Union and Switzerland, respectively, to the United States.

Ruder Finn has self-certified with the U.S. Department of Commerce regarding the collection, use, and retention of personal data from European Union member countries in connection with the Privacy Shield Principles as part

of the Privacy Shield program. To learn more about the Privacy Shield program, and to view Ruder Finn's certification, please visit <http://www.privacyshield.gov>.

Ruder Finn shall comply with the Privacy Shield Principles for all onward transfers of personal data from the EU and Switzerland, including the onward transfer liability provisions.

Internal and Independent Recourse Mechanisms:

In compliance with the Privacy Shield Principles, Ruder Finn commits to resolve complaints about our collection or use of your personal information. Ruder Finn is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission. Further, with respect to citizens to the European Union and/or Switzerland, Ruder Finn has agreed to cooperate in investigations by, and comply with the advice of, the Federal Trade Commission and appropriate EU or Swiss data protection authorities ("DPA") in managing and resolving any dispute or complaint and provide the relevant DPA with written confirmation of the action taken.

If you have questions or complaints regarding the use or disclosure of Personal Information in compliance with the principles of this privacy policy, you should contact us first at privacy@ruderfinn.com and we will contact you promptly to attempt to resolve your concerns or complaint. If contacting us does not resolve your concern or complaint, you may raise your complaint with the relevant DPA where you live or work (see http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm for contact information). As further explained in the [Privacy Shield Framework Annex I](#), a binding arbitration option is available in the event that residual complaints are not resolved by any other means.

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.

Accessing and updating your information; Limiting or Opting out:

Visitors who would like to access, correct, update or delete any personally identifiable information may contact us with a request to do so at privacy@ruderfinn.com. Similarly, Website users who wish to subscribe or unsubscribe to our marketing and informational communications or limit our use of any personally identifiable information in any way can do so by using the subscribe/unsubscribe options contained in our emails or by sending an email to privacy@ruderfinn.com.

We may take a reasonable period of time to respond to any request to update or modify any information, limit use of information or to opt out of or unsubscribe from any communications. We may also ask for additional information to authenticate the request. If you request the deletion, modification or limitation of use of your personal information maintained by us we will promptly review your request and respond. If we grant your request, such information may be retained for a period of time in our backup systems as a precaution against system failures. Some information may be retained for longer periods as required by law, contract or auditing requirements. In some circumstances we will not be able to limit use of your personal information without unsubscribing you from communications or deleting your information.

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. 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.

Careers/Executive Trainee & Internships:

Demographic information, including gender and occupation is not actively sought, but may be submitted and used when a visitor responds to an online job or internship application.

How to Contact Us:

If you ever have any questions about this Privacy Policy, please contact us at privacy@ruderfinn.com.

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