RUDER FINN PRIVACY POLICY

Updated as of July 21, 2021

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. This privacy policy applies wherever it is posted or linked.

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. If you are a California resident, please see the additional disclosures at the end of this policy.

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. 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 Information:

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 automatically 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. We may also collect job applicants’ employment and education history, transcript, writing samples, and references.

You 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 personal information collected to only the minimum information required to complete a visitor’s request or to otherwise operate our Website. If a
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 and 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 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 collect imprecise location data derived from your IP address, or other data indicating a city or postal code. 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 unavailable 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. You may generally control your cookie preferences in your browser settings. Please see the “Your Rights and Choices” section below for more information about how you may control the information we collect.

Information from Our Clients:

We provide products and services to our clients, and may collect and process information about individuals (including through tracking technologies) at the direction of our clients ("client data"). Client data has historically included contact data, demographic data, content, service use data, device data, and location data, among other information. 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 their own privacy policies.

Information from Other Sources.

We also collect information from other sources. The categories of sources from which we collect information, and have collected from in the past 12 months, 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.
- Publicly-available sources, including data in the public domain.

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 and that we collect may be shared with Ruder Finn employees and service providers to the extent necessary to:

- Operate, manage, and improve the Websites;
- Administer our systems, such as monitoring and analyzing trends, usage, and activity, as well as to prevent or address fraud, breach of our policies, or other threats of harm;
- Conduct research, including surveys and quizzes;
• Send you technical notices regarding updates to our policies, or other administrative messages;
• Register you for a conference or other event;
• Develop and send advertising, direct marketing, and communications about our and/or other entities’ products, offers, promotions, rewards, events, and services; or,
• Fulfill any other purpose at your direction.

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 may also collect and use other information with notice to you and 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.

We use 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, 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).

Sharing of Information:
We share information we collect in accordance with the practices described in this Privacy Policy. The categories of parties with whom we share information include:

• **Service Providers.** We share information with 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. Although we may permit them to 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.

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

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

• **Clients.** We share information with our business clients when it is relevant to the services we are providing to those clients.

• **Promotions:** In partnership with certain clients, we 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. Additional terms may apply. If you are a California resident, see the additional disclosures below.
• **Merger or Acquisition.** We share 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 share 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 share information to protect the rights, property, life, health, security and safety of us, the Service or anyone else.

• **Facilitating Requests.** We share information at your request or direction.

• **Consent.** We share information with notice to you and your consent.

Notwithstanding the above, we may share information that does not identify you (including information that has been aggregated or de-identified) 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.

**Links to Other Websites or Services 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.

We may embed a pixel or SDK on our Services that allows you to “like” or “share” content on social media. If you choose to engage with such integration, we may receive information from the social network that you have authorized to share with us. Please note that the social network may independently collect information about you through the integration.

**Your Rights and Choices:**

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

**Tracking Technology Choices.**

**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.

**Do Not Track.** Your browser settings may allow you to automatically transmit a “Do Not Track” signal to online services you visit. Note, however, there is no industry consensus as to what site and app operators should do with regard to these signals. Accordingly, unless and until the law is interpreted to require us to do so, we do not monitor or take action with respect to “Do Not Track” signals. For more information on “Do Not Track,” visit [http://www.allaboutdnt.com](http://www.allaboutdnt.com).

Please be aware that if you disable or remove tracking technologies some parts of the Service may not function correctly.

**Analytics Choices.**
We use analytics services, such as Google Analytics, to help us understand how users access and use the Service. Google provides tools to allow you to opt out of the use of certain information collected by Google Analytics at https://tools.google.com/dlpage/gaoptout.

Please note that if you opt out using this method, the opt out 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.

**Communications Choices.**

**E-mails.** You can opt-out of receiving promotional emails from us at any time by following the instructions as provided in emails to click on the unsubscribe link, or emailing us at the email address set out in the “Contact Us” section below with the word UNSUBSCRIBE in the subject field of the email. Please note that you cannot opt-out of non-promotional emails, such as those about your account, 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 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:**

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 from 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. We do not knowingly “sell,” as that term is defined under the California Consumer Privacy Act of 2018 (“CCPA”), the personal information of minors under 16 years old who are California residents.

If you are a California resident under 18 years old and registered to use the Websites, you can ask us to remove any content or information you have posted on the Websites. To make a request, email us at the email address set out below with “California Under 18 Content Removal Request” in the subject line, and tell us what you want removed. We will make reasonable good faith efforts to remove the post from prospective public view, although we cannot ensure the complete or comprehensive removal of the content and may retain the content as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

**Additional Disclosures for Nevada Residents.**

Nevada law (NRS 603A.340) requires each business to establish a designated request address where Nevada consumers may submit requests directing the business not to sell certain kinds of personal information that the business has collected or will collect about the consumer. A sale under Nevada law is the exchange of
personal information for monetary consideration by the business to a third party for the third party to license or sell the personal information to other third parties. If you are a Nevada consumer and wish to submit a request relating to our compliance with Nevada law, please contact us at privacy@ruderfinn.com.

**Additional Disclosures for California Residents.**

These additional disclosures apply only to California residents. Our Service is intended to provide information and services to job applicants and business clients. You understand and agree that information collected about you is solely within the context of (i) your role as an employee, job applicant, owner, director, officer, or contractor or (ii) Company conducting due diligence regarding, or providing or receiving a product or service to or from your employer.

**Notice of Collection.**

We collect the following categories of personal information, as described in the CCPA:

- **Identifiers**, including name, postal address, email address, and online identifiers (such as IP address).
- **Customer records**, including phone number, billing address, and financial information.
- **Characteristics of protected classifications under California or federal law**, including gender.
- **Commercial or transactions information**, including records of products or services purchased, obtained, or considered.
- **Internet activity**, including browsing history, search history, and interactions with a website, email, application, or advertisement.
- **Geolocation data**.
- **Employment and education information**.
- **Inferences drawn** from the above information about your predicted characteristics and preferences.

For further details on information we collect, including the sources from which we receive information, review the “Collection of Information” and “Other Information Collected and/or Processed by Automated Means” sections above. We collect and use these categories of personal information for the business purposes described in the “The Way We Use Information” section above, including to manage our Websites.

We do not generally sell information as the term “sell” is traditionally understood.

To the extent “sale” under the CCPA is interpreted to include the activities set out in this Privacy Policy, we will comply with applicable law as to such activity. We disclose the following categories of personal information for commercial purposes: identifiers, characteristics, commercial or transactions information, internet activity, geolocation data, and inferences drawn. Please review the “Sharing of Information” section above for further details about the categories of parties with whom we share information.

**Right to Non-Discrimination.**

You have the right not to receive discriminatory treatment by us for the exercise of any your rights.

**Financial Incentives.**
Financial incentives are programs, benefits, or other offerings, including payments to consumers as compensation, for the disclosure, deletion, or sale of personal information about them.

Wherever we offer you with a financial incentive (as defined by the CCPA) we will provide you with a notice of financial incentives that includes a summary of the financial incentive, the material terms, and an opportunity to opt-in to the financial incentive. You will be able to opt-out at any time as set out in the notice of financial incentives.

We generally do not treat consumers differently if they exercise a right under California law. For example, if you opt-out of our mailing list, you can continue to receive most discounted prices by emailing us at privacy@ruderfinn.com. However, in certain circumstances, discounted prices will require you to be on our mailing list. In such circumstances, we may offer a price difference because the price is reasonably related to the value of your data.

Shine the Light.

Customers who are residents of California may request (i) a list of the categories of personal information disclosed by us to third parties during the immediately preceding calendar year for those third parties’ own direct marketing purposes; and (ii) a list of the categories of third parties to whom we disclosed such information. To exercise a request, please write us at the email or postal address set out in “Contact Us” above and specify that you are making a “California Shine the Light Request.” We may require additional information from you to allow us to verify your identity and are only required to respond to requests once during any calendar year.

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.

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.

Data protection laws in Europe require a “lawful basis” for processing personal data. Our lawful bases include where: (a) you have given consent to the processing for one or more specific purposes, either to us or to our service providers, partners, or clients; (b) processing is necessary for the performance of a contract with you; (c) processing is necessary for compliance with a legal obligation; or (d) processing is necessary for the purposes of the legitimate interests pursued by us or a third party, and your interests and fundamental rights and freedoms do not override those interests. Where applicable, we will transfer your personal data to third countries subject to appropriate or suitable safeguards, such as standard contractual clauses and Privacy Shield discussed below.

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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