



**THE COLONY GROUP, LLC AND BUCKINGHAM STRATEGIC
PARTNERS, LLC CALIFORNIA PERSONNEL
DATA PRIVACY NOTICE**

EFFECTIVE DATE: July 1, 2024

California Personnel Data Privacy Notice

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PURPOSE

Pursuant to the California Consumer Privacy Act, as amended by the California Privacy Rights Act (“CPRA”) (California Civil Code Section 1798.100 et seq.), this Personnel Data Privacy Notice (“**Notice**”) describes how The Colony Group, LLC and Buckingham Strategic Partners, LLC (collectively, “the **Firm**,” “**we**,” “**our**,” and/or “**us**”) handles Personal Information regarding current and former California employees, contractors, consultants, and officers (collectively, “**Personnel**,” a subset of “**Consumers**” under the CPRA), whose Personal Information is provided to us in connection with the employment or engagement relationship, and individuals who have applied for employment to or been recruited for employment by the Firm. This Notice provides examples of the types of Personal Information we collect, how we may use and share such Personal Information, and the choices available to you with respect to how we handle your Personal Information.

Where we refer to “Personnel,” “employment” or “engagement” in this Notice, we do so for convenience only and should in no way be interpreted as purporting to confer employment status on non-employees to whom this Notice also applies. This Notice does not form part of any contract of employment or engagement, does not confer any employment status or contractual right on any Personnel, or place any contractual obligation on the Firm.

SCOPE

This Notice applies to all California employment applicants, current and former Personnel.

COLLECTION OF PERSONAL INFORMATION

The Firm only collects Personal Information needed to accomplish its legitimate business purposes. For example, the Firm collects:

- Contact information, such as name, email address, mailing address, and phone number shared by you;
- Driver’s license number, passport number, insurance number, social security number, visa status and number and work authorizations shared by you and applicable government agencies or authorities;

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- Recruitment information shared by you or an employment recruiting agency, including Personal Information contained on your employment application, resume, and cover letter, shared by your references, and included in criminal background checks, where applicable;
- Payroll information shared by you, banking institutions and other payroll-related entities, such as banking and direct deposit forms, salary, tax forms, expense reimbursement records, and vacation and personal time off balances;
- Benefits information shared by you, such as benefits elections, the names and other legally-required information of beneficiaries, spousal, partner, and dependent information, and emergency contact information;
- Performance information, such as performance reviews and disciplinary reports;
- Company resource information provided by the Firm, such as use of company technology and resources, including email, instant messaging, IT help desk, and employee training tools.
- Surveillance information provided by the Firm or its authorized providers, such as cameras and CCTV that, when in use, may capture your image or information about your movements to protect the safety of our Personnel, visitors, and equipment.
- Other Personal Information collected for our legitimate business purposes.

Some Personal Information types listed above are considered to be “special categories” or sensitive Personal Information requiring a higher level of protection. Please note that we may collect, store, and use sensitive Personal Information such as your social security number or other state identification numbers, and your account log-in information along with any required security or access codes.

We collect such sensitive Personal Information as provided by you and others (e.g., medical/wellness providers, government agencies, background check providers) for specific purposes, such as health/medical information in order to accommodate a disability or illness and to provide benefits, and diversity-related Personal Information (such as gender, race or ethnicity) in order to comply with legal obligations and internal policies relating to diversity and anti-discrimination. Please be assured that we will only use such sensitive information for the purposes set out in this Notice and as provided by law.

USE OF PERSONAL INFORMATION

The Firm only uses Personnel Personal Information for its legitimate business purposes, such as payroll processing, network and facility security, provision of Personnel benefits, and management of its Personnel. In some cases, the Firm may use Personal Information to pursue legitimate interests of its own or those of third parties, provided Personnel’s interests and fundamental rights do not override those interests. Situations in which the Firm processes Personal Information include:

- Recruitment purposes, such as evaluating an application for employment, conducting interviews, contacting references, conducting background checks (when we have your consent), and deciding terms of an employment offer;

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- Onboarding purposes, such as establishing payroll processes, benefits enrollment, and other Personnel management services;
- Personnel management purposes, such as monitoring assignments, evaluating performance, training, and responding to Personnel requests, inquiries, and comments;
- Operational purposes, such as distributing payroll and administrating benefits, updating Personnel files, conducting audits, and providing IT support and other troubleshooting; and
- Legal, regulatory and compliance purposes, such as implementing internal policies, responding to suspected fraud, illegal, or other noncompliant activity, protecting Firm's and others' rights and property, and complying with laws, legal processes, or governmental requests. Additionally, and as permitted by applicable law, Firm reserves the right to monitor and audit any traffic or information in its environments and managed services. As such, Personnel connecting to these environments and managed services have no expectation of privacy when using computing and information services, whether from a Firm-owned or -managed device or a personal device.

We only use Personal Information for the purposes for which it was collected, unless we reasonably consider that such Personal Information should be used for another reason and that reason is compatible with the original purpose of collection. These purposes are disclosed (or otherwise reasonably apparent) to Personnel at the time of collection. The Firm will notify its Personnel if it intends to use their Personal Information for a materially different purpose. When possible, consistent with its legitimate business purposes, the Firm offers its Personnel choices regarding the Personal Information collected and how the Firm uses or discloses such Personal Information.

If you do not wish to or cannot provide certain Personal Information requested or do not permit the Firm to use it for its stated purpose(s), we may not be able to perform certain activities (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

DISCLOSURE OF PERSONAL INFORMATION

The Firm may disclose Personal Information to its parent company, Focus Financial Partners, and to third-parties (e.g., service providers) assisting the Firm in accomplishing the business purpose for which the Personal Information was collected. For example, the Firm may disclose Personal Information:

- With employment-related vendors such as recruitment and background check providers;
- With payroll processing vendors and providers of online Human Capital management services, as well as providers of Personnel benefits;
- With legal or regulatory authorities to comply with our obligations, to protect the rights and property of the Firm, Personnel, our clients, and the public and to detect and respond to suspected illegal activity and threats to the safety of any person or of our systems or services;

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- With public authorities responsible for public safety, law enforcement, or national security; and
- With your consent and at your direction in situations not related to your official employment or engagement with the Firm.

SECURITY OF PERSONAL INFORMATION

Where the Firm discloses Personal Information to third parties, it does so for the business purposes described in this Notice and where appropriate, requires that such parties maintain its confidentiality and maintain appropriate systems and processes to ensure its security and protection.

NO SALE OF PERSONAL INFORMATION

In the preceding 12 months, the Firm has not sold, nor will it sell, any Personal Information.

DATA RETENTION

We retain your Personal Information for as long as we reasonably need to in order to carry out the purpose for which you have shared it with us or to comply with applicable law. We may retain aggregate and anonymized information indefinitely.

DATA PRIVACY RIGHTS

Personnel who are residents of California have certain rights over their personal information under the CPRA, including the right to: access/know what information we collect from you; the right to correct that information; the right to restrict our use of certain personal information; and the right to delete your personal information. The CPRA includes exceptions and exemptions that will limit your ability to exercise your CPRA rights for certain types of Personal Information.

Right to Know

Under the CPRA, you have the right to request information about the Personal Information we have collected about you during the past 12 months and what categories of Personal Information we have shared with unaffiliated third parties.

Right to Access

Under the CPRA, you have the right to request that we disclose the following to you:

- The categories of Personal Information collected about you;
- The specific pieces of sources for Personal Information we collected about you;
- The business or commercial purpose for collecting that Personal Information; and
- The categories of third parties with whom we share that Personal Information.

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Once we receive and confirm your verifiable access request, we will disclose the requested information covering the preceding 12 months, unless an exception applies.

Right to Delete

Under the CPRA, you have the right to request that we delete your Personal Information. Once we receive and confirm your verifiable consumer deletion request, we will delete or de-identify (and direct our service providers to delete or de-identify) your Personal Information from our records, unless an exception applies.

Right to Restrict/Opt-Out

You can request that we restrict the use of your sensitive information (such as Social Security number) when there is no statutory exemption that allows us to use that information. Please note that the Firm only uses such sensitive information in the course of providing employment related services to you.

How To Exercise Your Rights

California Personnel may exercise their CPRA provided rights described above by either:

- Sending us an email at compliance@thecolonygroup.com with the subject-line “Data Subject Request” or
- Calling us at 800-758-8200

We will verify your request by matching information you have previously provided to us to information you provide as part of your request. You have the right to request that an agent submit a request to exercise your rights on your behalf. We require that your agent provide a notarized statement from you authorizing your agent to take the requested action. We reserve the right to contact you directly if we have any questions or concerns about the agent’s submission. We are not obligated to respond to more than two access requests for the same individual’s personal information within a 12-month period.

Verifiable Consumer Request

Each verifiable consumer request must provide sufficient information to allow us to reasonably verify that you are the person about whom we collected Personal Information or an authorized agent. We will only request as much information as is necessary to process your request. We cannot respond to your request if we cannot verify and confirm your identity or authority to make the request.

Response Timing and Format

We intend to respond to a verified consumer request within 45 days of our receipt. If we require additional time to respond, we will inform you of the reason for additional time needed and anticipated timing for our response. Our response will also explain why we cannot comply with your request, if applicable.

NON-DISCRIMINATION

We will not discriminate against you for exercising any of your CPRA rights.

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CHANGES TO OUR PRIVACY NOTICE

We reserve the right to amend this privacy notice at our discretion and at any time.

CONTACT US

If you have questions or concerns regarding this Notice, please contact:

One Boston Place, 11th Floor

201 Washington Street

Boston, MA 02108

(800) 758-8200 phone

(617) 723-6338 fax

compliance@thecolonygroup.com

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Appendix 1 Categories of Data Collected From Personnel

The below table lists the categories of Personal Information the Firm may collect from Personnel, including examples of information that fall within each category. For each category, we have also provided the categories of sources from which the information was collected, the purposes of collection and use, and the categories of third parties with whom we will share such data.

Category of Personal Information Collected	Categories of Sources of Personal Information	Business or Commercial Purposes for Collection and Use of Personal Information	Categories of Third Parties with Whom Personal Information is Shared
<p>Identifiers, such as:</p> <ul style="list-style-type: none"> • Full name, nicknames, or previous names (such as maiden names) • Mailing address(es) • Email address(es) • Phone number(s) • Contact information for related persons, such as authorized users of your account • Social Security or other taxpayer identification numbers • Passport number • Client ID • Account number <p>For security purposes, we will not disclose these identifiers in response to an access request under the CPRA.</p>	<ul style="list-style-type: none"> • You • Service Providers 	<ul style="list-style-type: none"> • Process your employment information • Maintain the integrity of our records • Security and risk management, fraud prevention, and similar purposes • Perform our contractual obligations • Maintain our ongoing employment relationship • Create and manage your personnel accounts 	<ul style="list-style-type: none"> • Parent, brother-sister or subsidiaries • Service providers • Law enforcement officials and individuals involved in legal proceedings • U.S. Postal Service and other couriers • Address verification providers • Other third parties with your consent or at your direction
<p>Financial Information, such as:</p> <ul style="list-style-type: none"> • Bank account number(s) and details • Your account numbers at other financial institutions • Payroll information 	<ul style="list-style-type: none"> • You • Payment processors and other financial institutions • Service providers 	<ul style="list-style-type: none"> • Process employment information and payments to personnel • Maintain the integrity of our records • Security and risk management, fraud prevention, and similar purposes 	<ul style="list-style-type: none"> • Service Providers including payment processors, financial institutions, and others as needed to complete transactions and for authentication, security, and fraud prevention • Professional advisors including lawyers, auditors, consultants, and

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		<ul style="list-style-type: none"> • Perform our contractual obligations • Maintain our ongoing employment relationship • Create and manage your personnel accounts 	<p>others who provide professional services to the Firm</p> <ul style="list-style-type: none"> • Other unaffiliated parties (including government agencies) as required by law
<p>Commercial Information, such as:</p> <ul style="list-style-type: none"> • Account information, transaction history, and related records (such as and sales of securities) • Records related to website and mobile application usage • Non-biometric data collected for authentication (passwords, account security questions) 	N/A	N/A	N/A
<p>Internet or Electronic Network Activity Information, such as:</p> <ul style="list-style-type: none"> • IP address • Device identifiers or other persistent identifiers • System identifiers including online user names or credentials • Advertising ID • Encrypted password • Device characteristics (such as browser information) • Web server logs • Application logs • Browsing data and search history • First-party cookies • Third-party cookies • Web beacons, clear GIFs, and pixel tags 	<ul style="list-style-type: none"> • You and from your devices when you interact with our websites and mobile applications. For example, when you visit our websites, our server logs record your IP address and other information. • Automatically, via technologies such as cookies and web beacons, when you visit our websites or mobile applications • Service providers, including computer security 	<ul style="list-style-type: none"> • For system administration and technology management, including optimizing our websites and applications • For information security and cybersecurity purposes, including detecting threats • For recordkeeping and reporting, including logs and records maintained as part of transaction and interaction information • For metrics and analytics 	<ul style="list-style-type: none"> • Service providers supporting information technology and security providers, including companies such as network security services that retain information on malware threats detected • Service providers supporting fraud prevention, detection, and mitigation • Professional advisors including lawyers, auditors, consultants, and others who provide professional services to the Firm

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	services and advertising technology providers		
Geolocation Data , such as general geographic location (for example, city, state, and zip code)	<ul style="list-style-type: none"> IP address when you use our websites, network, or devices 	<ul style="list-style-type: none"> For information security and fraud prevention For our business purposes 	<ul style="list-style-type: none"> Service providers who assist with our information technology and security programs Service providers including fraud prevention, detection, and mitigation providers Professional advisors including lawyers, auditors, consultants, and others who provide professional services to the Firm
Audio, electronic, visual, thermal, olfactory, or similar information , such as: <ul style="list-style-type: none"> Video images CCTV recordings Voicemails 	<ul style="list-style-type: none"> You Automatically, such as when we use CCTV cameras in our facilities 	<ul style="list-style-type: none"> For internal business purposes, such as call or video recordings used for training, coaching, or quality control For relationship purposes, such as the use of photos and videos for social media purposes (with your consent) For premises security purposes and loss prevention 	N/A
Inferences , such as: <ul style="list-style-type: none"> Inferences drawn about you from your Personal Information Propensities, attributes, and/or scores generated by internal analytics programs and used for information security purposes, product and service development and improvement, and marketing 	N/A	N/A	N/A

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<p>Professional, educational, or employment-related information, such as job title, employer name and industry, date of hire, educational information such as your transcript</p>	<ul style="list-style-type: none"> • You • Your employer(s) • Your education provider(s) 	<ul style="list-style-type: none"> • Process employment information and payments to personnel • Maintain the integrity of our records • For recordkeeping and compliance 	<p>N/A</p>
<p>Other information that relates to or is reasonably capable of being associated with you, such as:</p> <ul style="list-style-type: none"> • Child’s name, date of birth, address, Social Security number or other taxpayer identification number, educational information (if account assets are used to pay education expenses directly to an educational institution) • Personal characteristics and preferences, such as your age, marital and family status, and languages spoken • Household demographic data, including from real estate records and census data • Data from public social media profiles, such as Twitter, LinkedIn, and similar platforms • Hobbies and interests 	<ul style="list-style-type: none"> • We do not collect Personal Information directly from children under 16. We receive limited Personal Information about children from clients (parents and other adults) only as required to establish and maintain accounts for the children’s benefit • Unaffiliated parties that provide access to information you make publicly available, such as social media • Service providers that help us understand our clients, including data aggregators and public records providers <p>We may also infer information about you based on information you have given us and on your past interactions with us</p>	<ul style="list-style-type: none"> • Process your employment information • Maintain the integrity of our records • Security and risk management, fraud prevention, and similar purposes • For recordkeeping and compliance 	<ul style="list-style-type: none"> • Professional advisors including lawyers, auditors, consultants, and others who provide professional services to the Firm • Other third parties (including government agencies) as required by law

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	and other companies. See Inferred and derived information below		
Biometric Information, such as voice recordings	N/A	N/A	N/A
Characteristics of Protected Classifications Under California or US Law, such as age, race, ethnicity, gender, sexual orientation, disability, veteran status, marital or family status.	N/A	N/A	N/A