

# Privacy Policy

Last updated and effective: June 10, 2024

- I. [INFORMATION WE COLLECT AND PURPOSE FOR DOING SO](#)
- II. [SOURCES FROM WHICH WE COLLECT INFORMATION](#)
- III. [TO WHOM WE DISCLOSE INFORMATION AND WHY](#)
- IV. [HOW LONG WE RETAIN INFORMATION](#)
- V. [YOUR RIGHTS AND HOW TO EXERCISE THEM](#)

This Privacy Policy ("Policy") explains how Frank, Rimerman + Co. LLP and its affiliates<sup>1</sup> ("we," "our," "us," and "FRCO") collect, use, and disclose information about you when you use our websites to which this Privacy Policy is posted or linked, including <http://www.frankrimerman.com> (collectively, "Site"), or any other interactions we have with you such as emails, newsletters and other online or offline communications, and as further stated below. There may be additional notices of our privacy practices that we provide at or before the time we collect your personal information. This Policy also describes your privacy rights and how you can exercise them.

By using our Site, you are consenting to our handling of your information as set forth in this Policy.

## I. INFORMATION WE COLLECT AND PURPOSE FOR DOING SO

In the 12 months preceding the last update and effective date of this Policy, we have and continue to collect the following categories of personal information from you and various other sources for the business purposes set forth below.

Categories of Personal Information	Our Business Purposes
Identifiers, including name, addresses, including email address, telephone	<ul style="list-style-type: none"><li>▪ To manage, administer and provide FRCO Services</li></ul>

---

<sup>1</sup> FRCO affiliates include Frank, Rimerman Advisors, LLC, Frank Rimerman Information Security, LLC, and FRC, LLC .

Categories of Personal Information	Our Business Purposes
<p>number and other contact information, unique personal identifier, online identifier, internet protocol (IP) address.</p>	<ul style="list-style-type: none"> <li>▪ To complete transactions, fulfill terms or obligations, and otherwise perform FRCO Services</li> <li>▪ To identify, contact or respond to candidates for employment opportunities with us</li> <li>▪ To meet legal obligations as an employer or potential employer</li> <li>▪ To contact identified person(s) in case of an emergency</li> <li>▪ To notify you of changes to our Site(s), our Services, or our policies and practices</li> <li>▪ To respond to your inquiries</li> <li>▪ To send you information regarding our news, upcoming events, products and Services</li> <li>▪ To communicate with you regarding events for which you have registered or attend and as reasonably necessary for the management of such events, including disclosure of your information to co-organizers, sponsors and third-party service providers</li> <li>▪ To modify, enhance and improve the browsing experience for visitors to our Site</li> <li>▪ To verify the identity of consumers or their Authorized Agents who submit requests relating to their personal information</li> <li>▪ To send you emails, mail, messages and other communications about</li> </ul>

Categories of Personal Information	Our Business Purposes
	<p>FRCO for marketing, business development, and other promotional purposes</p> <ul style="list-style-type: none"> <li>▪ To deidentify, aggregate and/or anonymize data for statistical analyses</li> <li>▪ To investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to physical safety of any person, and/or violations of FRCO’s policies, procedures and/or contracts</li> <li>▪ To comply with applicable laws and legal requirements, such as court orders, subpoenas, and search warrants, and cooperate with regulatory agencies and law enforcement</li> <li>▪ To establish or exercise legal rights and/or defend against legal claims of FRCO, of Clients, and of others for whom FRCO has a legal duty to do so</li> </ul>
<p><b>Personal information described in <a href="#">California Civil Code 1798.80 (e)</a></b>, such as signature, social security number, passport, driver’s license or state identification card number, insurance policy number, financial account number, education and employment information</p>	<ul style="list-style-type: none"> <li>▪ Same purposes as for Identifiers above and</li> <li>▪ To provide clients our financial advisory and other Services</li> <li>▪ To recruit, hire, employ, provide benefits and perform other human resources functions</li> </ul>
<p><b>Characteristics of protected classification under California or federal law</b>, including but not limited to age, race, color, ancestry, national</p>	<ul style="list-style-type: none"> <li>▪ Same purposes as for Identifiers above and</li> <li>▪ To provide clients our financial advisory and other Services</li> </ul>

Categories of Personal Information	Our Business Purposes
<p>origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, reproductive health decision making, military and veteran status or genetic information (including familial genetic information)</p>	<ul style="list-style-type: none"> <li>▪ To recruit, hire, employ, provide benefits and perform other human resources functions</li> <li>▪ Comply with federal and state equal employment opportunity laws</li> <li>▪ Design, implement and promote FRCO diversity, equity, inclusion and belonging programs and other programs, as required or permitted by law</li> <li>▪ Perform workforce analytics, data analytics and benchmarking</li> <li>▪ Conduct internal audits, grievances, and suspected violations of company policy</li> <li>▪ Establish, exercise and defend the legal rights of FRCO and its employees, customers, and other third parties to whom we have such obligations, and to assert legal claims</li> </ul>
<p><b>Commercial information</b>, such as records of personal property, products or services purchases, or other purchasing or consuming histories</p>	<ul style="list-style-type: none"> <li>▪ Same purposes as for Identifiers above and</li> <li>▪ To evaluate, modify, improve and enhance our Site and Services</li> <li>▪ To provide clients our financial advisory and other Services</li> <li>▪ To provide benefits and perform other human resources functions</li> </ul>
<p><b>Biometric information</b></p>	<ul style="list-style-type: none"> <li>▪ To provide clients our financial advisory and other Services, such as fingerprinting where required</li> </ul>

Categories of Personal Information	Our Business Purposes
	<ul style="list-style-type: none"> <li>▪ To provide benefits and perform other human resources functions</li> <li>▪ To fulfill our legal obligations as they may arise from time to time, such as temperature checks prior to entry into office space or events</li> </ul>
<p><b>Internet or other electronic network activity</b>, including Internet Protocol (IP) address, browsing history, search history, interaction with websites, applications or advertisements</p>	<ul style="list-style-type: none"> <li>▪ To protect FRCO Site and Services</li> <li>▪ To analyze visits and activity on our Site</li> <li>▪ To evaluate, modify, improve and enhance FRCO Site and Services</li> <li>▪ To promote and market FRCO and its Site and Services. For more information about our use of cookies and online tracking, please see our <a href="#">Cookie Notice</a></li> <li>▪ To detect security incidents, protect against malware, illegal activity, and/or pursue those responsible</li> <li>▪ Identify and repair errors that impair functionality</li> </ul>
<p><b>Geolocation data</b>, including from IP addresses</p>	<ul style="list-style-type: none"> <li>▪ To protect FRCO Site and Services</li> <li>▪ To comply with requirements of third parties, e.g., office building owners and managers who restrict parking garage and building access</li> </ul>
<p><b>Audio, electronic, visual or similar information</b>, included voicemail messages, phone and/or video interviews, recorded phone calls, etc.</p>	<ul style="list-style-type: none"> <li>▪ Same purposes as for Identifiers above</li> </ul>

Categories of Personal Information	Our Business Purposes
<p><b>Professional or employment-related information, and educational information</b>, including information on a resume, employment history, education history, certifications, languages, security clearance information, work authorization, past and expected compensation, and other work-related information</p>	<ul style="list-style-type: none"> <li>▪ Same purposes as for Identifiers above</li> <li>▪ To provide clients our financial advisory and other Services</li> <li>▪ To recruit, hire, employ, provide benefits and perform other human resources functions</li> </ul>
<p><b>Inferences drawn from any other personal information</b>, including individual's preferences, aptitudes, abilities and characteristics</p>	<ul style="list-style-type: none"> <li>▪ Same purposes as for Identifiers above and</li> <li>▪ To create, maintain and protect confidential customer lists</li> </ul>
<p><b>Sensitive personal information</b>, which includes subtypes of personal data in the categories above, e.g., social security, driver's license, state identification card or passport number; racial or ethnic origin, citizenship or immigration status, religious or philosophical beliefs, or union membership; genetic data; and biometric information for the purpose of uniquely identifying a consumer</p>	<p>While we collect information that falls within this category of sensitive personal information for the same purposes for Identifiers, Personal information described in Cal. Civ. Code 1798.80 (e), Characteristics of protected classifications; and Biometric information, FRCO does not collect or use sensitive personal data for the purposes of uniquely identifying you or inferring characteristics about you</p>

**II. SOURCES FROM WHICH WE COLLECT INFORMATION**

**Information you provide to us**

We collect information that you provide directly to us. For example, we collect information when you visit our Site, engage us for our Services, interact with us by sending us an email,

or subscribe or register for a newsletter or an event with us. The types of information we may collect include your contact information, such as your first and last name, email address, phone number, and other information you provide to us.

### **Information automatically collected from you when you use our Site**

- **Information about your use of our Site:** FRCO and its third-party service providers may also use a variety of technologies that passively or automatically collect information about how the Site is accessed and used including but not limited to Internet Protocol (“IP”) addresses, Internet or other electronic network activity information, such as browsing history, search history, and other information regarding your interaction with an Internet website, application, or advertisement.
- **Cookies and other tracking technologies:** Cookies are data files saved to your computer’s hard drive when you visit a website. A “session cookie” expires immediately when you end your session (i.e., close your browser). A “persistent cookie” stores information on the hard drive so when you end your session and return to the same website at a later date, the cookie information is still available. We use session and persistent cookies, either directly or through a third-party service provider, as well as other tracking technologies (including but not limited to pixel tags and web beacons). These cookies enable us to operate our Site and facilitate your browsing and the use of our Site, so that you enjoy a seamless experience (e.g., we will remember which is your preferred language and will display the content of our website accordingly). Please note that we use cookies to carry out traffic and business analytics as well as statistics activities, which enable us to understand how you use our website and improve them, as well as to provide you with targeted advertising.

For more information on how we use cookies, please see our cookie policy located at <http://www.frankrimerman.com/cookie-policy/>

### **Information collected from you for events**

For the purposes of this Policy, an “event” includes any conference, forum, seminar, webinar or workshop, whether it takes place in-person or virtually. If you register for an event, we may require that you provide us with your contact and other information. Such information could include your name, job title, company name, address, telephone number and/or e-mail

address. In certain instances, you may also be required to provide your financial and billing information (e.g., billing name and address, credit card number, etc.). By registering for a specific event, you agree to our processing of the personal and/or other information you submit as part of the registration process.

### **Customer Information collected from you and third parties for our Services**

We collect certain nonpublic information about you when you consider to or engage us to provide you with our financial, advisory and other Services ("Customer Information"). The essential purpose for collecting Customer Information is to allow us to provide Services to you. Customer Information we collect may include:

- Information that you provide on applications or other forms. This Customer Information may include personal and household information such as income, spending habits, investment objectives, financial goals, statements of account, and other records concerning your financial condition and assets, together with information concerning employee benefits and retirement plan interests, wills, trusts, mortgages and tax returns.
- Identifying information such as your name, age, address, social security number, etc.
- Information about your transactions with us, or others (e.g., broker-dealers, clearing firms, or other chosen investment sponsors).
- Information we receive from consumer reporting agencies (e.g., credit bureaus), as well as other various materials we may use to provide an appropriate recommendation or to fill a service request.

### **Information we collect from third parties**

We may receive information from third-party service providers that we engage under written agreements to help us fulfil our business purposes, including to provide you our Services. Examples of information received from such third-party service providers may include background checks as part of our hiring and other HR processes, and information about your experiences or interactions with such service providers. We may combine such third-party data with other information we receive from or about you.

### III. TO WHOM WE DISCLOSE INFORMATION AND WHY

FRCO does not knowingly sell your personal data to third parties for monetary or other valuable consideration.

FRCO does not share your personal data with third parties for cross-context behavioral advertising.

#### **Information We May Disclose to Contractors, Service Providers or Other Third Parties**

Where necessary to achieve FRCO's business purposes described above, we may disclose your information to third-party contractors or service providers that we engage pursuant to written agreements to help us provide our Site and Services and otherwise fulfill our business purposes. We may disclose your information to contractors or service providers to perform administrative or marketing services on our behalf, or to other third parties as required or allowed by law, as follows:

- **To Protect Ourselves or Others:** We may access, preserve, and disclose your information, other account information, and content if we believe doing so is required or appropriate: (i) to comply with law enforcement or national security requests and legal process, such as a court order or subpoena; (ii) in response to your consent or at your direction to disclose the information; (iii) to protect the rights, property, and/or safety of you, us and others; or (iv) to enforce our policies, contracts or as otherwise permitted under applicable law.
- **Merger, Sale, or Other Asset Transfers:** If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider, then your information may be disclosed as part of such a transaction as permitted by contract and/or applicable law.
- **Fulfil Transactions and Provide Services:** We may disclose personal information to persons necessary to effect transactions and provide the Services that our customers authorize, such as broker-dealers, custodians, independent managers etc.
- **Compliance:** We may disclose personal information to third parties assessing our compliance with industry standards (e.g., professional licensing authorities, etc.), and to our attorneys, accountants, auditors, and regulators
- **Government:** We may be required or permitted by law to disclose personal information about you to governmental agencies, law enforcement, etc.

- **Our Affiliates:** We may disclose your information to our affiliates, namely: Frank, Rimerman Advisors, LLC, Frank, Rimerman Information Security, LLC, Frank, Rimerman + Co. CPA's LLP, and FRC, LLC.
- **Service Providers:** We may obtain from and disclose your information to our service providers who assist us in fulfilling our business purposes, including our Services and HR processes, and who need access to your information in order to do so. These service providers do not use your information beyond the purpose of fulfilling its service obligations to us. We may also disclose your information to any third-party to whom you instruct us to disclose, only with your prior consent and as allowed, permitted or not prohibited by applicable law.

#### **IV. HOW LONG WE RETAIN YOUR INFORMATION**

FRCO will retain the information described in this Policy for the period necessary to fulfil the purposes described in this Policy, unless a longer retention period is required or permitted by laws applicable to FRCO. We apply the following criteria to determine retention periods: (i) as long as we have a relationship or potential relationship with you plus any legally required minimum retention periods and as long as necessary for FRCO's business purposes for which it was collected); (ii) as required by legal obligations to which FRCO is subject (such as employment and accounting obligations); (iii) as advisable in light of our legal position (such as applicable statutes of limitations) in order to establish, exercise or defend against legal claims; and (iv) as necessary to meet our legitimate business needs (such as for forecasting, planning, follow-up and documentation purposes).

#### **V. YOUR RIGHTS AND HOW TO EXERCISE THEM**

##### **Your Rights**

Subject to certain exceptions, and subject to our receipt of a verifiable consumer request, you have the following rights with respect to your personal information:

- **Request to Know and Access:** You have the right to know what personal information we have collected about you, and you have the right to request that we disclose (i) the categories of personal information we have collected, (ii) the categories of sources from which we collected that information, (iii) our business purpose for collecting, selling, or sharing your personal information, if any, (iv) the categories of third parties to whom we disclose your personal information, and (v) the specific pieces of personal

information we have collected about you. You have the right to request a copy of your personal information.

- **Request to Correct and Delete:** You have the right to request that we correct inaccurate personal information we have about you, taking into account the nature of the personal information and the purpose of processing that personal information. You also have the right to request that we delete personal information that we have collected from you.
- **Request Information About Selling, Sharing or Disclosing:** Of a business that sells personal information to a third party for monetary or other valuable consideration, that shares personal information with a third party for cross-context behavioral advertising, or discloses personal information to a contractor or service provider for business purposes, you have the right to request the business disclose (i) the categories of personal information that the business collected, (ii) the categories of personal information that the business sold or shared about the consumer, and the categories of third parties to whom the personal information was sold or shared, by category or categories of personal information for each category of third parties to whom the personal information was sold or shared; and (iii) the categories of personal information that the business disclosed about the consumer for a business purpose and the categories of persons to whom it was disclosed for a business purpose.
- **Right to Opt-Out of Sale or Sharing of Personal Information:** Of a business that sells personal information to a third party for monetary or other valuable consideration or that shares personal information with a third party for cross-context behavioral advertising, you have the right to opt out of such sale or sharing.
- **Right to Limit the Use and Disclosure of Sensitive Personal Information:** You have the right to direct a business that collects sensitive personal information about you to limit its use to that which is necessary to perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services, and as otherwise authorized by law.
- **No Discrimination for Exercising Rights:** You have the right not to be retaliated or unlawfully discriminated against because you have opted out or exercised any of the above rights, including but not limited to by being (a) denied goods or services; (b) charged different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; (c) provided a different level or quality of goods or services; (d) told that you will receive a different price or rate for

goods or services or a different level or quality of goods or services; or (e) retaliated against as an employee, applicant for employment or as an independent contractor.

To make any of the foregoing request, please contact us via our portal <https://report.syntrio.com/frankkrimerman/privacy>, call our toll-free at 855-550-0007 or email us at [privacy@frankkrimerman.com](mailto:privacy@frankkrimerman.com). After you submit a request, we will require you to confirm your request and to also verify your identity by providing some information about yourself. If we are unable to verify your identity, we reserve the right to deny your requests. You may also designate an authorized agent to make a request on your behalf. You may make such a designation by providing the agent with your written and signed permission to act on your behalf and by directly confirming with us that you have provided the authorized agent permission to submit such a request. As permitted by law, we may require you to verify your identity in response to a request even if you choose to use an agent. The authorized agent will also need to verify their own identity directly with us. If you are disabled, you may contact us to access this notice in an alternative format.

### **“Do Not Track”**

Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. DNT is a way for users to inform websites and services that they do not want certain information about their webpage visits collected over time and across websites or online services. Because there is not a commonly accepted standard for interpreting DNT requests, we do not recognize or respond to browser-initiated DNT signals. For more information about “do-not-track” requests please visit <https://allaboutdnt.com/>.

### **Your California Privacy Rights**

California’s Shine the Light law gives customers who are California residents the right to ask us, once a year: (1) what personal Information we disclosed to third parties for those third parties’ direct marketing purposes in the prior calendar year; and (2) the identities of the companies with which we shared the information. The terms “customers” and “personal information” have the same meaning given by the Shine the Light law (see [California Civil Code Section 1798.83](#)). To obtain such information, please contact us as indicated below in the “Contact us” section.

### **Children’s Online Privacy Protection**

Neither our Site or our Services are intended for or directed to children. Accordingly, we do not knowingly collect or maintain personal information of children under the age of 16. If we discover upon collection of information that the person is under 16 years of age, we will not maintain or use the child's personal information without the parent or guardian's consent. If you believe that we have inadvertently collected personal information from a child under the age of 16, please contact us as indicated below in the "Contact us" section, and we will make reasonable efforts to delete such information.

### **Security of your information**

We maintain reasonable safeguards to protect your information against loss and unauthorized access, use, transfer, modification, disclosure, or destruction. We also require by written agreement that third-party contractors and service providers assisting us to provide our Services, or who are providing Services on our behalf, to do the same. However, no electronic data transmission or storage of information can be guaranteed to be 100% secure. Please note that we cannot ensure or warrant the security of any information that you transmit to us.

Our employees and third parties are provided with information on a need-to-know basis. All employees are subject to confidentiality agreements and undergo annual training on the proper handling of information.

### **Links to other websites and third-party content**

Our Site may contain links to other third-party websites that are not owned or operated by us. Our Privacy Policy only applies to our Site, and we are not responsible for the privacy practices or the content of other third-party websites or applications. Any information you disclose to other websites is not subject to the provisions of this Privacy Policy. We advise you to check the privacy policies of those other websites or applications before providing your information to them so that you can better understand how they collect and use your information.

### **Changes and Policy updates**

We may change information on the Site and/or this Privacy Policy at any time and without prior notice to you, and any changes will be effective immediately upon the posting of the revised Privacy Policy on the Site. We encourage you to periodically review this page for the latest information on our privacy practices.

**Contact us**

If you have any questions about our Privacy Policy, please contact us via our portal <https://report.syntrio.com/frankrimerman/privacy>; by calling toll free: 855-550-0007; by sending an email to: [privacy@frankrimerman.com](mailto:privacy@frankrimerman.com) or writing to us at:

Frank, Rimerman + Co. LLP  
ATTN: Legal Department  
60 S Market St, Ste 500  
San Jose, CA 95113