

Information Privacy Policy

Primary Owner	Operations / Marketing	Version	1.0
Responsible party	Data Protection Officer	Implementation Date	December 20, 2019
Associated policies	Terms of Use	Revision Date	
Application departments	Marketing		

Summary of Policy Topic

This Privacy Policy governs the manner in which Richey May & Co., LLP collects, uses, maintains and discloses information collected from individual usage of the <http://www.richeymay.com> and www.richeymaytech.com websites (“Site”). This privacy policy applies to the Site and all products and services offered by Richey May & Co., LLP and Richey May Technology Solutions (collectively “RMC”) are committed to the protection of the privacy of our clients’ information.

"Site" means all websites including www.richeymay.com, or www.richeymaytech.com interactive features, widgets, plug-ins, applications, content, downloads and other electronic services maintained by any of the RMC or family of companies.

- “we,” “us,” “our,” or “RMC,” as used on this Site, mean the RMC and RMC family of companies.
- “you” or “your” mean you as an individual and, if you are an employee or representative of another person or entity, such person or entity.

Please review the Terms of Use. The Terms of Use governs your use of the Site. By using the Site, you agree to this Privacy Policy and the Terms of Use. You also agree to our collection, use, disclosure and storage of your information as described by this Privacy Policy. If you do not agree to the terms of this Privacy Policy, do not provide us with any Personal Information and do not use this Site.

This Privacy Policy does not apply to the following.

- Data we get from third parties, unless we combine such data with Personal Information (defined below) that we have collected under this Privacy Policy.
- Our data collection activities offline or outside of the Site (unless otherwise stated below).
- The data practices of third parties that may interact with the Site, such as social media sites and websites where we advertise. We encourage you to review the privacy statements of any such other websites to understand their information practices.

PERSONAL IDENTIFICATION INFORMATION

We may collect nonpublic personal identification information from individuals in a variety of ways, including, but not limited to, when individuals visit our site, register on the site, subscribe to the newsletter, respond to a survey, fill out a form, and in connection with other activities, services, features or resources we make available on our Site. Individuals may be asked for, as appropriate, name, email address, mailing address, phone number. Individuals may, however, visit our Site anonymously. We will collect personal identification information from individuals only if they voluntarily submit such information to us. Individuals can always refuse to supply personally

identification information, except that it may prevent them from engaging in certain service or website related activities.

NON-PERSONAL IDENTIFICATION INFORMATION

We may collect non-personal identification information about Individuals whenever they interact with our Site. Non-personal identification information may include the browser name, the type of computer and technical information about individuals' means of connection to our Site, such as the operating system and the Internet service providers utilized and other similar information.

WEB BROWSER COOKIES

RMC uses third-party cookies to analyze trends, administer the website, track users' movements around the website, and to gather demographic information on page clicks. We use cookies to help you personalize your online experience. Cookies are uniquely assigned to you and can only be read by a Web server in the domain that issued the cookie to you. The purpose of a cookie is to tell the Web server that you have returned to a specific page.

RMC automatically records information sent by your computer web-browser in our website server logs, including your IP address, the pages you visit, and other non-personally identifiable information. Site statistics may be compiled by or reported thru Google Analytics for these purposes.

User's web browser places cookies on their hard drive for record-keeping purposes and sometimes to track information about them. User may choose to set their web browser to refuse cookies, or to alert you when cookies are being sent. If they do so, note that some parts of the Site may not function properly.

Individuals can manage the cookie settings of your browser by referencing the following links:

[Microsoft Explorer](#)

[Google Chrome](#)

[Mozilla Firefox](#)

[Apple Safari](#)

HOW WE USE COLLECTED INFORMATION

We may use the information we collect about you (including personal information, to the extent applicable) in order to perform our obligations under our Services Agreements and on the basis of our legitimate interest including to (a) provide, operate, maintain, improve, and promote the Websites and RMC Services; (b) enable you to access and use of RMC Websites and the Services; (c) process and complete transactions, and send you related information, including purchase confirmations and invoices; (d) send transactional messages, including responses to your comments, questions, and requests; provide customer service and support; and send you technical notices, updates, security alerts, and support and administrative messages; (e) send promotional communications, such as providing you with information about products and services, features, surveys, newsletters, offers, promotions, contests, and events; and provide other news or information about us and our partners (you can opt-out of receiving marketing communications from us by providing us with name(s) and email address(es) you want opted out via an email to us at privacy@richeymay.com or following the unsubscribe instructions included in our marketing communications).

Richey May & Co., LLP may collect and use nonpublic personal information for the following purposes:

- To improve customer service; Information that is provide helps us respond to all customer service requests and support needs more efficiently.
- To personalize user experience; We may use information in the aggregate to understand how our individuals as a group use the services and resources provided on our Site.
- To improve our Site; We may use feedback that is provided to improve our products and services.
- To run a promotion, contest, survey or other website specific feature; To send nonpublic information they agreed to receive about topics we think will be of interest to them.
- To send periodic emails; We may use the email address to send information and updates pertaining to their order. It may also be used to respond to their inquiries, questions, and/or other requests. If individual decides to opt-in to our mailing list, they will receive emails that may include company news, updates, related product or service information, etc. If at any time an individual would like to unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each email or individuals may contact us via our Site.

HOW WE PROTECT YOUR INFORMATION

We adopt appropriate data governance, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our Site.

We retain records relating to professional services that we provide so that we are better able to assist clients with their professional needs and, in some cases, to comply with professional guidelines. In order to guard your nonpublic personal information, we maintain physical, electronic, and procedural safeguards that comply with our professional standards.

Information privacy, our professional ethics, and the ability to provide clients with quality services are very important to us. Please contact us if you have any questions or concerns about the confidentiality of your information.

USE AND SOURCE OF NONPUBLIC PERSONAL INFORMATION

We collect nonpublic personal information about you that is provided to us by you directly or indirectly:

- In writing via regular mail, email or over the Internet.
- Verbally via the phone or personal conferences.
- From third parties, with your authorization.
- From transactions with our affiliates or us.

We may use third party service providers to help us operate our business and the Site or administer activities on our behalf, such as sending out newsletters or surveys. We may share nonpublic information with contract third parties for very limited purposes.

We do not disclose any nonpublic personal information obtained in the course of our practice except as required to perform appropriate services or permitted by law.

THIRD PARTY SERVICES PROVIDERS

Permitted disclosure of your nonpublic personal information is restricted to employees and other parties or contracted third parties who need to know that information to assist us in providing services to you. In all such situations, we stress the confidential nature of information being shared and that they are bound either by our professional standards of confidentiality or nondisclosure agreements where applicable.

In addition, these third parties, including their content and links, may be constantly changing. These sites and services may have their own privacy policies and customer service policies. Browsing and interaction on any other website, including websites which have a link to our Site, is subject to that website's own terms and policies.

Compliance with Laws and Law Enforcement Requests; Protection of Our Rights:

In certain situations, we may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We may disclose personal information to respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims. We may also share such information if we believe it is necessary in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Service Agreement, or as otherwise required by law.

PARENTS AND CHILDREN

We do not knowingly collect personal information on our website from children under the age of 18. Parents have the right to delete the personal information of a child under the age of 18 by contacting us.

YOUR GENERAL DATA PROTECTION REGULATION (GDPR) RIGHTS

This section pertains to personal data of individuals in the European Economic Area (EEA). The information in this section is provided pursuant to the European Union's General Data Protection Regulation with regard to instances when RMC acts as a data controller.

You can exercise or address these rights (subject to retention and other requirements under applicable law) by contacting our Data Protection Officer as indicated at the end of this Notice.

1. Access. You have the right to obtain access to your personal data.
2. Rectification. You have the right to ask for incorrect, inaccurate, or incomplete personal data to be corrected.
3. Erasure. You have the right to request that personal data be erased.

4. Restriction on processing. You have the right to request the restriction of the processing of your personal data in specific cases.
5. Objection to processing. You have the right to object to the processing of your personal data for marketing purposes or on grounds relating to your particular situation.
6. Portability. You have the right to receive your personal data in a machine-readable format and send it to another controller.
7. Withdrawal of consent. You have the right to withdraw consent from RMC’s direct marketing.
8. Lodging a complaint with a Supervisory Authority. You have the right to lodge a complaint with a Supervisory Authority within your Member State.

PRIVACY POLICY FOR CALIFORNIA RESIDENTS

The California Consumer Privacy Act (“CCPA”), which is effective as of January 1, 2020, regulates how we handle personal information of California residents and gives California residents certain rights with respect to their personal information.

Richey May & Co., LLP is both a “business” and a “service provider” under the CCPA. The following supplemental privacy policy applies to information we collect in our role as a business—this is when we interact directly with you.

When we act as a service provider (for example, by providing our services to another company that you interact with), we follow the instructions of the business that engaged us with respect to how we process your personal information. If you would like more information about how your personal information is processed by other companies, including companies that engage us as a service provider, please contact those companies directly.

This supplemental privacy policy is effective as of January 1, 2020, shall apply only to residents of California, and may be subject to change. The general privacy policy shall continue to apply to the extent that it applies to you as a resident of California. If you are a resident of California, we are required to disclose certain uses and disclosures in a certain format, as well as to inform you of certain rights you may have. Any capitalized terms used in this supplemental privacy policy shall have the same meaning as in the general privacy policy.

CHANGES TO THIS PRIVACY POLICY

Richey May & Co., LLP has the discretion to update this privacy policy at any time. When we do, we will revise the updated date at the bottom of this page. We encourage Individuals to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this privacy policy periodically and become aware of modifications.

YOUR ACCEPTANCE OF THESE TERMS

By using any RMC internet, intranet or extranet website, you signify your acceptance of this policy. If you do not agree to this policy, please do not use our Site. Your continued use of the Site following the posting of changes to this policy will be deemed your acceptance of those changes.

CONTACTING US

If you have any questions about this Privacy Policy, the practices of this site, or your dealings with this site, please contact us at:

Richey May & , LLP

Website: <http://www.richeymay.com> or www.richeymaytech.com

Mail: 9605 S. Kingston Ct. Suite 200 Englewood, CO 80112

Phone: (303) 721-6131

Email: privacy@richeymay.com Attn: Richey May Data Protection Officer

TO REMOVE INFORMATION

You may request to remove your information from our Marketing System. By [clicking here](#), you are directing Richey May and Company to erase your personal data from Richey May and Company's Marketing System only. Other data may be retained for specific business-related purposes or need.

DISCLAIMER

Audit, tax or professional advice contained in or accompanying this document, unless otherwise specifically stated, is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code, or (ii) promoting, marketing, or recommending to another party any transaction or matter that is contained in or accompanying this document. In addition, unless otherwise specifically stated, any advice provided shall not be deemed a formal tax opinion upon which the addressee can rely.

This document was last updated on January 31, 2020