

# PRIVACY POLICY

**Effective Date:** January 1, 2023

**Last Updated:** July 1, 2023

The Privacy Policy describes how Monument Consulting, LLC and its affiliated entities (“Monument” “we” and “us”) process personal information about you. This Privacy Policy applies when you visit or use our websites or mobile applications (each a “Site” and collectively “Sites”), contact our customer service team, engage with us on social media, communicate with us on behalf of a vendor or customer, purchase our products or services, or otherwise interact with us. It also applies when our clients provide your personal information to us in connection with the services we provide to them.

If you have any questions, please contact us as provided below. You may download a copy of this Privacy Policy by clicking [here](#). If you have a disability and need to receive this Privacy Policy in a different format, please contact us at [privacy@monumentconsulting.com](mailto:privacy@monumentconsulting.com).

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## Categories of Personal Information We Process

The type of information that we collect depends on your interaction and relationship with us. We collect, and in the preceding 12 months have collected and processed, the below categories and types of personal information with your consent or as otherwise required or permitted by law.

- **Contact Information.** We collect full name, email address, current and prior address, telephone number, and business contact information.
- **Identifiers.** We collect social security number, driver's license number, employee number signature, passport number, state identification card number, I-9 documentation, internet protocol address, account usernames and passwords, signature, and social media user names.
- **Personal Characteristics or Traits.** We collect date of birth, gender, age, nationality, racial or ethnic origin, religion, marital status, citizenship status, military or veteran status and disability information.
- **Financial Information.** We collect tax identification number, financial or bank account information, tax-related information, wire instructions, payment card number, payment card expiration date and CVV code, and billing address.
- **Commercial Information.** We collect records of products or services purchased, obtained, or considered and purchasing histories.
- **Internet or Electronic Usage Data.** We collect data related to network and website interaction history, IP address, website cookie information, interaction with advertisements and browsing time.
- **Audio/Visual Data.** We collect audio, electronic, photographic, visual or similar data including videos, photographs, or audio recording.
- **Geolocation Data.** We collect geolocation data including the general region or area from which you access our Sites.
- **Professional or Employment Information.** We collect job application details, previous work history, salary wage expectation, reference information, background check results, drug test results, professional memberships and certifications, personnel number, job title role, office location, company entity, compensation and bonus data, benefits data, dependency information, emergency contact information, health insurance information such as your policy number and spouse or dependent information, time tracking, absence and annual leave, travel booking details, business contact details, expense details, performance rating, records of disciplinary action, health and safety related information, workers compensation claims, grievances and complaints, exit interview and comments, and reasons for termination. To the extent permitted and required by applicable laws, we may collect information about your medical and treatment history, diagnosis, dates of service, provider name, and your ability to work.
- **Education Information.** We collect education history, degrees, transcripts, qualifications and certifications.
- **Sensitive Information.** We may collect social security number, driver's license number, passport number, state identification card number, racial or ethnic origin, religious or philosophical beliefs, or union membership, health information, and sexual orientation.
- **Inferences:** We use information from the categories of personal information described above in order to create a profile about you, to reflect your preferences, characters, behavior and attitude.

## Sources Of Personal Information

We collect, and in the preceding 12 months have collected, personal information in the following ways:

- **Directly from you.** We collect contact information, identifiers, personal characteristics or traits, financial information, commercial information, audio/visual data, professional or employment information, education information, and sensitive information that you provide directly to us.
- **When you visit our locations.** When you visit our offices or facilities, we also collect contact information and audio/visual data.
- **Automatically.** When you access our Sites, we collect identifiers, geolocation data, and internet or electronic usage data using tools like browser cookies.
- **From third parties:** We may collect contact information, identifiers, personal characteristics or traits, commercial information, audio/visual data, professional or employment information, and education information, from third-parties including our vendors, clients, recruiters, suppliers, service providers.
- **From our employees or job applicants.** We collect contact information, identifiers, personal characteristics or traits, financial information, commercial information, audio/visual data, professional or employment information, education information, and sensitive information from our current or former job applicants, contractors and employees.
- **Social media platforms.** Depending on the information you choose to share and your privacy settings, we may collect contact information, identifiers, audio/visual data, personal characteristics or traits, geolocation data, commercial information, professional or employment information, internet or electronic usage data, and inferences. Based on the way you have set your privacy settings on your social media accounts, most social media platforms, like Facebook and Instagram, analyze data about how you interact with our Sites and combine it with information on other users to provide us information about you. In addition, we may receive information about you if other users interact with us on social media and information about you is visible to us, for example the fact that you are “friends” or other public-facing profile information.

## Purposes for Collecting Personal Information

We use personal information for the following business and commercial purposes:

- **Providing our Products and Services.** We use contact information, identifiers, financial information, commercial information, professional or employment information, and education information to allow clients to contract for and purchase our products and services, provide the services we have contracted for, process payments, and provide updates and reports requested by clients.
- **Transactional Purposes.** We use contact information, identifiers, financial information, professional or employment information, and commercial information to: (i) communicate with you; (ii) provide you with customer assistance; (iii) administer contracts with our vendors, clients, and service providers; and (iv) provide supporting business activities such as billing and collections, procurement, and tax related activities;
- **Recruiting and Hiring.** We use contact information, identifiers, audio/visual data, professional or employment information, education information, financial information, sensitive personal information, and inferences make informed decisions on recruitment and assess your suitability for the role, communicate with you about your application, respond to your inquiries and

schedule interviews, and to reimburse you for any agreed expenses incurred in the application process.

- **Employment Purposes.** We use contact information, identifiers, personal characteristics or traits, financial information, audio/visual data, professional or employment information, education information, sensitive information, and inferences to administer all aspects of our employment or contractor relationship with you. For example, we use the information to complete new hire paperwork, enroll you in our human resource management system, conduct background checks, collate company directories and provide communication services, provide you access to our offices and IT systems, set up your personnel file, create benefits packages and provide and administer employee benefits, track your time and attendance and absences and to pay you and reimburse you for professional expenses, provide training, conduct performance and talent management activities, and to evaluate and process time off, sick leave, leaves of absence, or accommodation requests.
- **Business Operations.** We use contact information, identifiers, personal characteristics or traits, financial information, audio/visual data, professional or employment information, education information, sensitive information, and inferences for our day-to-day business operations including maintaining records, planning, budgeting, calibration, headcount, database administration, diversity metrics, surveys, evaluations, reports, compliance, regulatory, audit, investigative and disciplinary purposes and other ethics and compliance reporting tools, and to support our business operations.
- **Analytical Purposes.** We use identifiers, internet or electronic usage data, geolocation data, commercial information, and inferences to analyze preferences, trends and statistics.
- **Marketing and Promotional Purposes.** We use contact information, identifiers, financial information, professional or employment information, internet or electronic usage data, geolocation data, and inferences to improve our marketing efforts, conduct market research, prospect for new clients or consultants, engage in client relationship management, client engagement, administering promotions, and to provide you with information about us, including personalized marketing communications.
- **Maintenance and Improvement of our Sites and Systems.** We use identifiers, geolocation data, internet or electronic usage data to improve our Sites and systems, provide and maintain functionality on our Sites and systems, and help us diagnose technical and service problems and administer our Sites and systems. Maintenance of our systems includes activities such as applying security controls for company systems, providing new system implementations, applying change management processes, and providing IT Service Desk / Help Desk Support.
- **Develop and Improve Our Products and Services.** We use contact information, identifiers, financial information, commercial information, personal characteristics or traits, geolocation data, internet or electronic usage data, audio/visual data, inferences, and professional or employment information to help us develop new products and services and to improve and analyze our existing products and service offerings.
- **Security and Fraud Prevention.** We contact information, identifiers, personal characteristics or traits, financial information, commercial information, internet or electronic usage data, audio/visual data, geolocation data, professional or employment information, education information, sensitive information, and inferences to: (i) protect us, our employees, and our Sites, premises, assets, systems, products, services and intellectual property, including from fraud, theft, and misconduct; (ii) enforce our policies and terms; (iii) conduct vendor due diligence; and

(iv) detect and prevent fraud, theft and misconduct including by verifying the identity of those we are conducting business with.

- **Legal:** We use contact information, identifiers, personal characteristics or traits, financial information, commercial information, internet or electronic usage data, audio/visual data, geolocation data, professional or employment information, education information, sensitive information, and inferences to comply with our legal obligations, including reporting requirements, and defend ourselves in legal proceedings, and protect our company and our property, employees, and others through legal proceedings.
- **Other Purposes:** We may use contact information, identifiers, personal characteristics or traits, financial information, commercial information, internet or electronic usage data, audio/visual data, geolocation data, professional or employment information, education information, sensitive information, and inferences for other reasons we may describe to you.

## How We Disclose Personal Information

We disclose personal information in the following circumstances:

- **Service Providers.** We may share personal information with vendors and service providers who support the operation of our services, website, and our business and who need access to such information to carry out their work for us (including, for example, cloud hosting, payment processing, order fulfillment, email delivery, marketing, insurance, operating systems and platforms, transportation, and customer support services). In some cases, the vendor or service provider may directly collect the information from you on our behalf. In the past 12 months, we have disclosed contact information, identifiers, personal characteristics or traits, financial information, commercial information, internet or electronic usage data, audio/visual data, geolocation data, professional or employment information, education information, sensitive information and inferences to our service providers.
- **Clients.** We disclose personal information with our clients when we provide them with products or services. Sometimes we collect this personal information on a client's behalf when we act as their service provider or vendor. In the past 12 months, we have disclosed contact information, identifiers, financial information, professional or employment information, education information and inferences to our clients.
- **Affiliates.** We may share personal information with and among our parent company, subsidiaries, affiliates, or their successors or assigns. In the past 12 months, we have disclosed contact information, identifiers, personal characteristics or traits, financial information, commercial information, internet or electronic usage data, audio/visual data, geolocation data, professional or employment information, education information, sensitive information and inferences to our affiliates.
- **Analytics/Advertising Partners.** We may share personal information with third party analytics or advertising partners, including social media platforms and networks, who provide analytics or marketing and advertising services to us. In the past 12 months, we have disclosed contact information, identifiers, commercial information, internet or electronic usage data, geolocation data, and inferences to our service providers.

- **Professional Advisors.** We may share information with professional advisors, such as lawyers, bankers, tax consultants, auditors, and insurers, where necessary in the course of the professional services that they render to us.
- **Government Entities.** We share information with regulatory and government entities including government, administrative, law enforcement and regulatory agencies; tax authorities; and other public agencies or authorities if we think we should in order to comply with any applicable law, regulation, legal process or other legal obligation. This includes cooperating with law enforcement when we think it is appropriate, obtaining legal remedies or limiting our damages, and to enforcing or protecting our contracts, legal rights or the rights of others, including by responding to claims asserted against us.
- **Corporate Transaction Recipients.** We may share information with potential investors, purchasers, merger partners, and their advisors in the event we: (i) sell or transfer, or are considering selling or transferring, all or a portion of our business or assets; or (ii) are considering or engaging in any reorganization, conversion, merger, sale, joint venture, assignment, transfer or disposition of all or any portion of our ownership interest, business or operations; or (iii) are soliciting or accepting investments. We have not disclosed any personal information to corporate transaction recipients in the last 12 months.
- **Other Reasons.** We may disclose personal information for other reasons we may describe to you, including if you consent to the disclosure or direct us to disclose your information.

## We Combine Information

We combine information we obtain from different sources with publicly available information, including to create inferences about you. For example, we may combine information that we have collected offline with information we collect online. We combine information that we have collected across other third party sites. We combine information across devices, such as computers and mobile devices. We may also combine information we get from a third party with information we already have.

## Sensitive Personal Information

Unless specifically requested, we ask that you not send us, and you not disclose to us, through the Services or otherwise, any Sensitive Personal Information (e.g., social security number, taxpayer identification number, passport number, driver's license number, or other government-issued identification number; credit or debit card details or financial account number, with or without any code or password that would permit access to the account, credit history; or information on race, religion, ethnicity, sex life or practices or sexual orientation, medical or health information, genetic or biometric information, biometric templates, political or philosophical beliefs, political party or trade union membership, background check information, judicial data such as criminal records, or information on other judicial or administrative proceedings).

## How Long We Keep Personal Information

We will retain and use your information for as long as we need it to provide you services or products, or as long as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Where we process personal information for marketing purposes, we process the data until you ask us to stop and for a short period after this (to allow us to implement your requests). We also keep a record of

the fact that you have asked us not to send you direct marketing so that we can respect your request in future. We use the following criteria to determine retention periods:

- how long the information is needed to provide our services and operate our business;
- whether there are contractual or legal obligations that exist that require us to retain the information for period of time;
- whether any law, statute, or regulation allows for a specific retention period;
- whether an individual has agreed to a longer retention period;
- whether the data is considered to be sensitive data; and
- what the expectation for retention was at the time the data was provided to us.

## Cookies, Analytics, and Other Tracking Technology

### Cookies and Tracking Technology

We want you to be aware that certain online tools exist to help us serve and recognize you when you visit our website. We receive and store certain types of information when you visit our website. When you access the website, we (including third-party analytics and advertising companies we work with) may place small data files on your computer or other device. These data files may be web beacons, cookies, clear gifs, pixel tags, e-tags, flash cookies, log files, or other local storage provided by your browser or associated applications. These tracking technologies, which are often referred to collectively as cookies, collect information about your use of the Sites and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in mobile apps, links clicked and conversion information. We use this information to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests, and better understand your online activity. If you want to remove or block cookies, you may be able to update your browser settings. You can also find instructions on how to manage cookies on different types of web browsers at [www.allaboutcookies.org](http://www.allaboutcookies.org). Please click [here](#) to change your preferences regarding cookies.

### Do Not Track Signals

Some browsers have a “do not track” feature. It lets you tell websites you visit that you do not want them to track your online activity. These features are not yet uniform across browsers. Our Sites are thus not currently set up to respond to these signals. For more information on Do Not Track signals, please visit <https://allaboutdnt.com/>.

### Cross-Contextual Behavioral Advertising and Targeted Advertising

We allow third-parties to provide analytics and advertising services and serve advertisements on our behalf across the Internet and in mobile applications. Our advertising partners may collect information about your activities on our Sites on your current device and combine it with information about your activities on other websites, mobile apps, and devices. They may also collect IP address, browser or operating system type and version, and demographic or inferred-interest information, as well as personal information if you have submitted such information to us through the Sites, such as your name, postal address, email address, or device ID. They collect such information using server logs, cookies, web beacons, tags, pixels, mobile advertising IDs (such as Facebook cookies or Google's Advertising ID), cross-device linking, and similar technologies. For example, our advertising partners may use the fact that you

visited our website to target advertising to you on other websites and mobile apps on your current device or on other devices you use. They may match your browsers or devices if you log into the same online service on multiple devices or if your devices share similar attributes that support an inference that they are used by the same person or household. This means that information about your activity on websites or apps on your current browser or device may be combined and used with information collected from your other browsers or devices. These third parties partners use this information for our and their own advertising, analytics, attribution, and reporting purposes. To learn more about interest-based advertising, tracking technologies, and how to opt out, please visit <http://www.aboutads.info/choices>. You can disable the sharing of your personal information for cross-contextual behavioral advertising or targeted advertising through online cookies and tracking technology by clicking here and changing your cookie preferences to ensure that Analytics and Advertising cookies are disabled.

### Session Replay Technology

We use session replay technology on our Sites. Session replay technology, also referred to as session playback or user experience (UX) replay, collects information regarding, records, and tracks your interactions with a website or application. It then and transforms those logged user events (such as mouse movements, clicks, page visits, scrolling, tapping, etc.) into a reproduction of what you actually did on the website or application. We use session replays for quality control, customer service, fraud prevention and security, and marketing purposes. Our session replay technology is owned and operated by a third-party who acts as our service provider. The information collected by this technology may be collected by, transferred to, and stored by our third-party service provider.

### ChatBot Technology

We use chatbots to help provide customer service and support, including through the use of a virtual assistant. A chatbot is a software application that mimics human conversations in text or voice interactions on our website or through our customer service hotline. It enables the communication between a human and a machine, which can take the form of messages or voice commands. The chatbot is designed to work without the assistance of a human operator. It responds to questions posed to it in natural language as if it were a real person using a combination of pre-programmed scripts and machine learning algorithms. When asked a question, the chatbot will answer using the knowledge database that is currently available to it. If the conversation introduces a concept it isn't programmed to understand; it will pass it to a human operator. If you use our chatbot service, we will collect any personal information you provide to use. We will also create and store a transcript of your chat interaction with us which will be shared with and stored by our third-party service provider. We use these transcripts and the information you provide for quality control, customer service, fraud prevention and security.

### Global Privacy Control and Opt-Out Preference Signals

Some browsers or browser extensions also allow you to tell websites not to share your information for cross-contextual behavioral advertising through the "global privacy control" or other opt-out preference signals. We will respond to these signals in a frictionless manner. Please note that we may not be readily able to associate an opt-out preference signal with other personal information such as your email address. If you configure this setting on your browser, certain features on our site may not work and you will receive less targeted advertising. You will also need to turn the setting on for each browser that you use.

### Google Analytics



We use analytics services provided by Google Analytics. If you would like more information on how Google uses data when you visit or use our Sites, please visit [www.google.com/policies/privacy/partners](http://www.google.com/policies/privacy/partners). If you would like to opt-out, Google provides a an opt-out tool which is available at <https://tools.google.com/dlpage/gaoptout>.

## Links to Other Websites

Our Sites may include links to other websites or applications whose privacy practices may differ from ours. If you submit personal information to any of those websites or applications, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit or application that you use.

## Security

We follow generally accepted industry standards to protect the personal information submitted to us and have implemented reasonable technical, organization, administrative and physical measures to protect personal information. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security and encourage you to use websites and share information with caution.

## This Website is Not Intended for Children

We do not knowingly collect or store any personal information from anyone under the age of 16. If we become aware that we have collected or stored personal information from an individual under age 16, we will remove his or her personal information from our files. If you are a parent or guardian and believe we may have inadvertently collected personal information from your child, please notify us immediately by sending an email to [privacy@monumentconsulting.com](mailto:privacy@monumentconsulting.com).

## Marketing Communications

**Marketing Emails.** You can opt out of marketing or advertising emails by using the "unsubscribe" link or mechanism noted in communications you receive from us. You may also request to opt out of marketing or advertising emails by contacting us at [privacy@monumentconsulting.com](mailto:privacy@monumentconsulting.com). Once we process your request, we will cease using the information for such purposes at no charge to you. If you opt out of getting marketing messages, you will continue to receive messages from us about your relationship with us where permitted by law.

**Phone Calls and Text Messages.** If you do not want to receive marketing phone calls or text messages from us, please inform us that you no longer want to receive calls from us when you receive a call from us, or reply STOP to a text message from us. You can also opt-out of telemarketing by contacting us at [privacy@monumentconsulting.com](mailto:privacy@monumentconsulting.com).

## Processing in the United States and Canada

Please be aware that information we obtain about you will be processed in the United States and across Canada by or service providers or us. By using the Sites or our services, you acknowledge your personal

information may be transferred to and processed in jurisdictions outside your own as described in this Privacy Policy. Please be aware that the data protection laws and regulations that apply to your personal information transferred to the United States, Canada or other jurisdictions may be different from the laws in your country of residence. The United States may not afford the same level of protection as laws in your own country.

## California Privacy Rights

**Shine The Light.** If you are a California resident, this section applies to you. The California Shine the Light law (Cal. Civ. Code § 1798.83) permits residents of California to request certain details about how their information is shared with third parties for the third-parties' direct marketing purposes. If you are a California resident and would like to make such a request, please contact us at [privacy@monumentconsulting.com](mailto:privacy@monumentconsulting.com). and include "CA Shine the Light" in the subject line of your email.

### California Consumer Privacy Act ("CCPA").

This section applies to residents of California.

Sale or Sharing of Personal Information. In the preceding 12 months, we have "sold" or "shared" (as those terms are defined in the CCPA) the following categories of personal information: identifiers, commercial information, internet or electronic usage data, geolocation data, and inferences. We do not knowingly sell or share the personal information of minors under the age of 16.

Use or Disclosure of Sensitive Personal Information. In the preceding 12 months, we have not used or disclosed sensitive personal information for purposes to which the right to limit use and disclosure applies under the CCPA.

Your Rights Under the CCPA. Subject to certain exceptions and limitations, the CCPA affords California consumers the following rights:

- You have the right to request that we tell you (i) what personal information we have collected about you, (ii) the sources of that information, (iii) the business or commercial purposes for collecting, selling or sharing the personal information; and (iv) the categories of third-parties to whom we have disclosed personal information.
- You have the right to request that we provide you with a copy of your personal information.
- You have the right to request that we delete personal information that we have collected from you.
- You have the right to opt-out of the sale of your personal information.
- You have the right to opt out of the sharing of your personal information for cross-context behavioral advertising
- You have the right to direct us to limit the use or disclosure of your sensitive personal information to only the purposes specified in the CCPA.
- You have the right to correct inaccurate personal information that we hold about you.
- You have the right to not be discriminated against for exercising any of your CCPA rights. We will not discriminate against you, deny you services, charge you a different price, or provide you with a lesser quality of services if you exercise any of your CCPA rights.

Exercising Your Rights. To exercise any of your rights, please use our webform or call us toll free at 844-223-4283. For all requests, you must provide us with your name, email address, phone number, and mailing address. We will verify your identity by matching the information we have collected against the information you have provided. Failure to provide the foregoing information may prevent us from processing your request. If you have requested that we correct your personal information, we may contact you to request additional information about the personal information that you believe is inaccurate, including supporting documentation.

In order to designate an authorized agent to act on your behalf, you must send a signed, written authorization to us at [privacy@monumentconsulting.com](mailto:privacy@monumentconsulting.com).

We engage in online advertising practices (and certain analytics or similar activities), which may be considered a “sale” or “share” for cross-context behavioral advertising. In addition to submitting the form above, you may need to disable sharing through cookies set by third parties on our Sites. To manage your cookie preferences, please click here and ensure that Analytics and Advertising cookies are disabled

If you have enabled Global Privacy Control or an opt-out preference signal on your browser or extension, we will honor such requests that can be recognized by our Sites by disabling Analytics and Advertising cookies. Please note that we may not be readily able to associate an opt-out preference signal with other personal information such as your email address. You will also only be opted out of online sales or sharing of personal information, and will need to turn it on for each browser you use. Refer to the “Exercising Your Rights” above if you would like to extend your opt-out request beyond the online advertising practices described above.

**Other Consumer Rights Information.** Under California Civil Code Section 1789.3, we are required to provide California residents with the following information:

- Unless otherwise expressly stated, this Site is provided without charge.
- To file a complaint regarding this Site or to receive further information regarding use of this website, please contact us via email at [privacy@monumentconsulting.com](mailto:privacy@monumentconsulting.com). You also may contact the Complaint Assistance Unit of the Division of Consumer Services of California’s Department of Consumer Affairs in writing at 400 R Street, Suite 1080, Sacramento, California 95814 or by telephone at (916) 445-1254 or (800) 952-5210.

**Removal of Content.** If you are a California resident under the age of 18, and a registered user of any site where this policy is posted, California Business and Professions Code Section 22581 permits you to request and obtain removal of content or information you have publicly posted. To make such a request, please send an email with a detailed description of the specific content or information to [privacy@monumentconsulting.com](mailto:privacy@monumentconsulting.com). Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.

## Nevada Privacy Rights

If you are a Nevada resident, you may request that we stop selling certain categories of personal information that we collect. We do not currently sell your personally identifiable information as those terms are defined under Nevada law. However, if you wish to submit a request to opt-out of the sale of such information if we were to engage in such a sale in the future, you may submit your request in writing

using our webform or by emailing us at [privacy@monumentconsulting.com](mailto:privacy@monumentconsulting.com). For all requests, you must provide us with your name, email address, phone number, and mailing address so that we can verify your identity by matching the information we have collected against the information you have provided. Failure to provide all of the foregoing information may prevent us from processing your request.

## Virginia, Colorado, and Connecticut Privacy Rights

This section applies to you if you are a resident of Virginia, Colorado, or Connecticut

We set forth above the categories of personal data we process, the purpose for processing personal data, the categories of personal data shared, and the categories of third parties with whom personal data is shared.

Your Rights. Consumers in certain states, including Virginia, Colorado, and Connecticut, may have the following rights with respect to their personal data:

- You have the right to request that we confirm whether or not we are processing your personal data and to access your personal data.
- You have the right to obtain a copy of your personal data in a portable and, to the extent technically feasible, readily usable format that allows data portability.
- You have the right to correct inaccurate personal data that we hold about you, taking into account the nature of the personal data and the purposes of the processing of the data.
- You have the right to request that we delete personal information that we have collected from you or obtained about you.
- You have the right to opt out of the processing of the personal data for purposes of (i) targeted advertising, (ii) the sale of personal data, or (iii) automated decision-making or profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.

Exercising Your Rights. To exercise any of your rights, please use our webform or call us toll free at 844-223-4283. For all requests, you must provide us with your name, email address, phone number, and mailing address. We will verify your identity by matching the information we have collected against the information you have provided. Failure to provide the foregoing information may prevent us from processing your request. If you have requested that we correct your personal information, we may contact you to request additional information about the personal information that you believe is inaccurate, including supporting documentation.

In order to designate an authorized agent to act on your behalf, you must send a signed, written authorization to us at [privacy@monumentconsulting.com](mailto:privacy@monumentconsulting.com).

Appealing Our Decision. If we refuse to take action on your request, you may appeal our decision within a reasonable period of time, not to exceed 90 calendar days from the date of your receipt of our response. You may exercise your appeal rights by emailing us at [privacy@monumentconsulting.com](mailto:privacy@monumentconsulting.com).

Please include your full name, the basis for your appeal, and any additional information to consider.

Cookie Based Opt-Outs for Cross Context Behavioral Advertising

We engage in online advertising practices (and certain analytics or similar activities), for targeted advertising and cross-context behavioral advertising. To turn off targeted and behavioral advertising through cookies, please click [here](#) and ensure that Analytics and Advertising cookies are disabled. Please note that we may not be readily able to associate your personal information with your IP address or Device ID.

If you have enabled an opt-out preference signal on your browser or extension, we will honor such requests that can be recognized by our Sites by disabling Analytics and Advertising cookies. Please note that we may not be readily able to associate an opt-out preference signal with other personal information such as your email address. You will also only be opted out of online targeted advertising or cross-context behavioral advertising, and will need to turn it on for each browser you use. Refer to the “Exercising Your Rights” above if you would like to extend your opt-out request beyond the online advertising practices described above.

## Canada Privacy Rights

Your Rights. If you are a resident of Canada, subject to certain exceptions and limitations, you have the following rights:

- **Your right of access:** Upon your written request, subject to certain exceptions, we will inform you of the existence, use, and disclosure of your personal information and will provide you with a copy of that personal information within the timeframes provided for by law. Access requests should be sent to us using the contact information below. We try to respond to all legitimate requests within one month. Occasionally, if required or permitted by law, it could take us longer than one month if your request is particularly complex or you have made a number of requests. In these cases, we will notify you and keep you updated. Depending on the scope of your request, or if you require additional copies, we may need to charge you a reasonable fee where permitted under law.
- **Your right to rectification:** If the personal information we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If you are entitled to rectification and if we’ve shared your personal information with others, we will let them know about the rectification where possible and where this would not involve disproportionate effort. If you ask us, where possible and lawful to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.
- **Your right to be forgotten:** If you are a resident of the province of Quebec, you have the right to control the dissemination of your personal information. As such, you may request that we de-index (i.e. delist from search results) any hyperlinks associated with your name and that provide access to your personal information if the underlying dissemination of your personal information contravenes the law or a court order, or if it otherwise causes serious injury to your reputation or privacy. This also includes your right to re-index (i.e. list in search results) any hyperlinks associated with your name where doing so can prevent the perpetuation of a serious injury to your reputation or privacy. You can contact us for assistance in deleting personal information previously provided to us. Please note that we will take a reasonable amount of time to process your request.
- **Your right to personal information portability:** If you are a resident of the province of Quebec, you have the right, in certain circumstances, to obtain the personal information that you have

provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.

- Your rights in relation to automated decision-making and profiling: If you are a resident of the province of Quebec, you have the right to know if we use your personal information to render a decision based exclusively on automated processing of such information. Upon request, you also have the right to know the categories of personal information used to render the decision, the reasons, and the principal factors that led to that decision. You have the right to correct the information used to render the decision, if you notice any inaccuracy. Lastly, you can submit observations in support to a request to review any automated decision reached using your personal information.
- Your right to request information about data processing: You may contact us to request information about our data processing activities, namely what personal information was collected from you and how process it. You may ask us to clarify the categories of persons that have access to your personal information and the applicable retention period for that information.
- Your right to withdraw consent, deactivate your account, or unsubscribe: You have the right to withdraw that your consent to our collection, use, and disclosure of personal information at any time. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Exercising Your Rights. To exercise any of your rights, please use our webform or call us toll free at 844-223-4283. For all requests, you must provide us with your name, email address, phone number, and mailing address. We will verify your identity by matching the information we have collected against the information you have provided. Failure to provide the foregoing information may prevent us from processing your request. If you have requested that we correct your personal information, we may contact you to request additional information about the personal information that you believe is inaccurate, including supporting documentation.

## European Union Privacy Rights

This section applies to residents of the European Economic Area (EEA) and Switzerland.

Controller. The controller of your personal information is Monument Consulting, LLC.

Pursuant to Article 27 of the General Data Protection Regulation (GDPR), **Monument Consulting, LLC** has appointed European Data Protection Office (EDPO) as its GDPR Representative in the EU. You can contact EDPO regarding matters pertaining to the GDPR:

- by using EDPO's online request form: <https://edpo.com/gdpr-data-request/>
- by writing to EDPO at Avenue Huart Hamoir 71, 1030 Brussels, Belgium

Disclosure and Cross-Border Transfer. Personal information that is shared with affiliates and third parties as described in this Privacy Policy is done pursuant to contracts that include the requisite protections under applicable data protection laws. In accordance with these laws, transfers of personal information outside of the European Economic Area are conducted in accordance with compliant arrangements such as data transfer agreements that contain standard contractual clauses adopted by the European Commission that provide safeguards for such transfers or legally recognized certifications and adequacy

decisions. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your personal information.

Lawful Basis for Processing Personal Information. The lawful basis for our collection and use of your personal information described in this Privacy Policy is that the processing is (i) necessary for our legitimate interests in carrying out our business, provided those interests are not outweighed by your rights and interests; (ii) necessary to perform a contract with a third-party or with you; (iii) necessary to comply with a legal obligation; or (iv) based, when necessary and appropriate, on your consent.

Special Categories of Data. Unless we specifically authorize you to do so, do not send us any Special Categories of Data, which is defined under applicable data protection laws as personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric characteristics, health, or sexual orientation.

Segmentation and Automated Decision Making. We do not use segmentation or automated decision-making without human intervention, including profiling.

Your Rights Over Your Personal Information. Subject to certain exceptions and limitations, you have the right to:

- Ask us to confirm whether we are processing your personal information.
- Ask us to provide you or a third party that you designate with certain of your personal information in a commonly used, machine readable format. Please note, however, that data portability rights apply only to personal information that we have obtained directly from you and only where our processing is based on consent or the performance of a contract.
- Request that we update or correct your personal information when it is inaccurate or incomplete.
- Request that we delete your personal information in certain circumstances.
- Request that we limit processing or stop processing your personal information in certain circumstances including for marketing activities and profiling for marketing activities and profiling for statistical purposes and, subject to certain exceptions, where such processing is based on our legitimate business interests.
- Withdraw or revoke consent previously granted to the extent permitted by law.

Exercising Your Rights. To exercise any of your rights, please use our webform or call us toll free at 844-223-4283. We will respond to all such requests within 30 days of our receipt of the request, unless there are extenuating circumstances, in which event we may take up to 60 days to respond. We will inform you if we expect our response to take longer than 30 days. Please note, however, that certain personal information may be exempt from such rights pursuant to applicable data protection laws. In addition, we will not respond to any request unless we are able to appropriately verify the requester's identity.

You also have the right to lodge a complaint with a data protection authority for your country or region or where an alleged infringement of applicable data protection laws occurs. For the EEA, a list of the national data protection authorities can be found at [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en).

## United Kingdom Privacy Rights

This section applies to residents of the United Kingdom.

Controller. The controller of your personal information is Monument Consulting, LLC.

Pursuant to Article 27 of the UK GDPR, **Monument Consulting, LLC** has appointed EDPO UK Ltd as its UK GDPR representative in the UK. You can contact EDPO UK regarding matters pertaining to the UK GDPR:

- by using EDPO's online request form: <https://edpo.com/uk-gdpr-data-request/>
- by writing to EDPO UK at 8 Northumberland Avenue, London WC2N 5BY, United Kingdom

Disclosure and Cross-Border Transfer. Personal information that is shared with affiliates and third parties as described in this Privacy Policy is done pursuant to contracts that include the requisite protections under applicable data protection laws. In accordance with these laws, transfers of personal information outside of the United Kingdom are conducted in accordance with compliant arrangements such as international data transfer agreements or legally recognized certifications and adequacy decisions. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your personal information.

Lawful Basis for Processing Personal Information. The lawful basis for our collection and use of your personal information described in this Privacy Policy is that the processing is (i) necessary for our legitimate interests in carrying out our business, provided those interests are not outweighed by your rights and interests; (ii) necessary to perform a contract with a third-party or with you; (iii) necessary to comply with a legal obligation; or (iv) based, when necessary and appropriate, on your consent.

Special Categories of Data. Unless we specifically authorize you to do so, do not send us any Special Categories of Data, which is defined under applicable data protection laws as personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric characteristics, health, or sexual orientation.

Segmentation and Automated Decision Making. We do not use segmentation or automated decision-making without human intervention, including profiling.

Your Rights Over Your Personal Information. Subject to certain exceptions and limitations, you have the right to:

- Ask us to confirm whether we are processing your personal information.
- Ask us to provide you or a third party that you designate with certain of your personal information in a commonly used, machine readable format. Please note, however, that data portability rights apply only to personal information that we have obtained directly from you and only where our processing is based on consent or the performance of a contract.
- Request that we update or correct your personal information when it is inaccurate or incomplete.
- Request that we delete your personal information in certain circumstances.
- Request that we limit processing or stop processing your personal information in certain circumstances including for marketing activities and profiling for marketing activities and profiling for statistical purposes and, subject to certain exceptions, where such processing is based on our legitimate business interests.
- Withdraw or revoke consent previously granted to the extent permitted by law.

Exercising Your Rights. To exercise any of your rights, please use our webform or call us toll free at 844-223-4283. We will respond to all such requests within 30 days of our receipt of the request, unless there



are extenuating circumstances, in which event we may take up to 60 days to respond. We will inform you if we expect our response to take longer than 30 days. Please note, however, that certain personal information may be exempt from such rights pursuant to applicable data protection laws. In addition, we will not respond to any request unless we are able to appropriately verify the requester's identity.

You also have the right to lodge a complaint with the Information Commissioner's Office. The ICO's complaint procedures may be found at <https://ico.org.uk/make-a-complaint/>.

## Contact Us

If you have any questions about this Policy or our data practices, please email us at [privacy@monumentconsulting.com](mailto:privacy@monumentconsulting.com). You can also write to us at:

Monument Consulting  
Attn: Privacy Officer  
1800 Summit Avenue  
Richmond, VA 23230

## Updates to Our Privacy Policy

From time to time we may change our privacy policy. We will notify you of any material changes to our privacy policy as required by law. We will also post an updated copy on the website where this appears. Please check our website periodically for updates. The "Last Updated" legend above indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Policy on any of our Sites.