

## RG+A Privacy Policy

Last Updated: January 24, 2020

Roger Green & Associates (“RG+A”) respects your privacy. Your privacy is a priority to us, and so is being transparent about how we collect, use, and share information about you. This privacy policy (“Privacy Policy”) is intended to help you understand the types of information we may collect from you or that you may provide when you visit the [thinkrga.com](http://thinkrga.com) (the “Site”) and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Privacy Policy covers the information we collect on the Site, in email and other electronic communications between you and the Site. The Privacy Policy does not apply to information collected by us offline or through other means or by any third-party affiliate, vendor, or services provider that may link to or be accessible from the Site. This policy also explains your choices about how we use information about you. Your choices include how you can opt out or object to certain uses of information about you and how you can access and update your information.

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Site. By accessing or using this Site, you agree to the Privacy Policy and the described information collection practices. This Privacy Policy may change from time to time. Your continued use of the Site after we make changes is deemed an acceptance of those changes, so please check the policy periodically for updates.

1. **Information Collected and How We Collect It.** We collect several types of information from and about users of our Site, including:
  - a. ***Personal Information.*** We may collect some or all of the following personal data when you join our mailing list, <http://thinkrga.com/contact/join-our-mailing-list/>, directly from you when you provide it to us through electronic communications, or automatically as you navigate through the Site. We will use it to send you communications about our services or to assist with Site maintenance, operations, and functionality.
    - Name
    - Address
    - Email address
    - Telephone number
    - Company name
    - Internet Protocol (IP) addresses
    - Access dates and times
  - b. ***Information Collected Through Automatic Data Collection Technologies.*** Like many website owners and operators, we use automated data collection tools such as Cookies



and Web Beacons to collect certain information, including details of your visits to the Site, such as traffic data and other communication data and the resources that you access on the Site, and information about your computer and internet connection, including your IP address, operating system, and browser type. The information we collect automatically is anonymized and does not include personal information. It helps use to improve the Site and to deliver a better service by enabling us or our third-party service providers to estimate our user size and usage patterns, store information about your preferences or recognize when you return to our Site.

The technologies we use for this automatic data collection may include:

**Cookies** to monitor aggregate usage and web traffic routing on our Site and to customize and improve our Site. Cookies are deleted when you close your browser. Although most browsers automatically accept Cookies, you can change your browser options to stop automatically accepting Cookies or to prompt you before accepting Cookies. Please note, however, that if you don't accept Cookies, you may not be able to access all portions or features of the Site. Some third-party service providers that we engage may also place their own Cookies on your device. Note that this Privacy Policy covers only our use of Cookies and does not include use of Cookies by such third parties.

**Web Beacons** (also known as web bugs, pixel tags or clear GIFs) are tiny graphics with a unique identifier that may be included on our Site and emails for several purposes, including to deliver or communicate with Cookies, to track and measure the performance of our Site, to monitor how many visitors view our Site or open emails. Unlike Cookies, which are stored on the device, Web Beacons are typically embedded invisibly on web pages (or in an e-mail).

**Log Data** means certain information about how a person uses our Site. Log Data may include information such as a user's IP address, browser type, operating system, the web page that a user was visiting before accessing our Site, the pages or features of our Site to which a user browsed, and the time spent on those pages or features, the links on our Site that a user clicked and other statistics. We use Log Data to administer the Site and we analyze (and may engage third parties to analyze) Log Data to improve, customize and enhance our Site by expanding their features and functionality and tailoring them to our users' needs and preferences. We may use a user's IP address to generate aggregate, nonidentifying information about how our Site is used.

2. **Information that We Share with Third Parties.** We will not share any information that we have collected from or regarding you except as described below:
  - a. Information Shared with Our Service Providers. We may engage third-party service providers to work with us to administer, maintain, or operate the Site. These third-party service providers have access to your information only for the purpose of performing



services on our behalf.

- b. *Information Shared with Google Analytics.* We use Google Analytics, a service provided by Google, Inc. (“Google”), to gather information about how users engage with our Site. For more information about Google Analytics and its opt out procedures, please visit <http://www.google.com/policies/privacy/partners/>.
  - c. *Information Shared with Marketing Service Providers.* We may also share your information with our marketing service providers to help us better market our services to you. These marketing service providers may use your information only for the purpose of helping us to provide the services to you.
  - d. *Information Shared with Other Third Parties.* We may share anonymized or aggregated data we collect from the use of the Site, such as de-identified demographic information, deidentified location information, information about the computer or device from which you access the Site, market trends and other analysis that we create based on the information we receive from you. We may also disclose your personal information to comply with any court order, law, or legal process, including to respond to any government or regulatory request.
3. **Your Choices About How We Use and Disclose Your Information.** We offer you choices regarding the collection, use and sharing of your information and we’ll respect the choices you make. Please note that if you decide not to provide us with the information that we request, you may not be able to access all of the features of the Site.
- a. *Tracking Technologies.* You can set your browser to refuse all or some browser cookies, or to alter you when cookies are being sent. If you disable or refuse cookies, some parts of this Site may be inaccessible or not function properly. [See Cookies.](#)
  - b. *Opt-Out of our Mailings.* When you sign up to join our mailing list, <http://thinkrga.com/contact/join-our-mailing-list/>, you have the option to opt-in to receive e-mails that promote services, including our research offerings, important news, and upcoming appearances. When you receive such promotional communications from us, you will have the opportunity to “opt-out” by following the unsubscribe instructions provided in the e-mails you receive. You may also opt-out by contacting us directly at [info@thinkrga.com](mailto:info@thinkrga.com) with your opt-out request. From time to time, we may send you certain communications regarding the services for which you will be unable to opt out, such as updates to this Privacy Policy.
  - c. *Deleting, Correcting, or Modifying Your Information.* If you want us to delete, correct, or modify the information we have stored about you, please contact us at [info@thinkrga.com](mailto:info@thinkrga.com) with your request. We’ll take steps to delete your information as soon we can, but some information may remain in archived/backup copies for our records or as otherwise required by law.



4. **The Security of Your Information.** We take reasonable administrative, physical and electronic measures designed to protect the information that we collect from or about you from unauthorized access, use or disclosure. Please be aware, however, that no method of transmitting information over the Internet or storing information is completely secure. Accordingly, we cannot guarantee the absolute security of any information.
5. **Responding to Do Not Track Signals.** Some browsers have incorporated “Do Not Track” (DNT) features that can send a signal to the websites you visit indicating you do not wish to be tracked. Because there is not yet a common understanding of how to interpret the DNT signal, our Site does not currently respond to browser DNT signals. You can use the range of other tools we provide to control data collection and use, including the ability to opt out of receiving marketing from us as described above.
6. **Links to Other Sites.** Our Site may contain links to websites and services that are owned or operated by third parties (each, a “Third-party Service”). Any information that you provide on or to a Third-party Service or that is collected by a Third-party Service is provided directly to the owner or operator of the Third-party Service and is subject to the owner’s or operator’s privacy policy. We’re not responsible for the content, privacy or security practices and policies of any Third-party Service. To protect your information, we recommend that you carefully review the privacy policies of all Third-party Services that you access.
7. **International Transfer.** Your information may be transferred to, and maintained on, computers located outside of your state, province, country or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you’re located outside the United States and choose to provide your information to us, we may transfer your information to the United States and process it there.
8. **Our Policy Toward Children.** Our Site is not intended or directed to children under 13 years of age and we do not knowingly collect information from children under 13. No one under age 13 may provide any information to the Site. If we learn that we have collected information of a child under 13, we will take steps to delete such information from our files as soon as possible. If you believe that we might have any information from or about a child under 13 years of age, please contact us at [info@thinkrga.com](mailto:info@thinkrga.com).
9. **California Residents.** If you are a California residents, California law may provide you with additional rights regarding our use of your personal information. This Section 9 applies solely to all visitors, users, and others who reside in the State of California and supplements the information contained elsewhere in this Privacy Policy. This Section is provided to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this Section.
  - a. **Information We Collect.**
    - i. Our Site collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or



indirectly, with a particular consumer or device (“**personal information**”). In particular, the Site has collected the following categories of personal information from its consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.  Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national 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, veteran or military status, genetic information (including familial genetic information).	NO
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	YES



H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

ii. Personal information does not include:

Publicly available information from government records.

Deidentified or aggregated consumer information.

Information excluded from the CCPA's scope, like:

health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;

personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

iii. We obtain the categories of personal information listed above directly from you (e.g., from the mailing list form that you complete) or indirectly from you (e.g., from automated data collection technologies).

**b. Information We Use.** We may use or disclose the personal information we collect as described in [Information Collected](#) and How We Collect It and [Information that We Share with Third Parties](#) above.

**c. Sharing Personal Information.** We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business



purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract. We share your personal information with the categories of third parties discussed in [Information that We Share with Third Parties](#).

- d. Disclosures of Personal Information for a Business Purpose.** In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose to our third-party service providers:
- Identifiers
  - Internet or other similar network activity
  - Geolocation data
- e. Sales of Personal Information.** In the preceding twelve (12) months, we have not sold personal information.
- f. Your Rights and Choices.**
- i. Access to specific information and data portability rights.** You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:
- The categories of personal information we collected about you.
  - The categories of sources for personal information we collected about you.
  - Our business or commercial purpose for collecting or selling that personal information.
  - The categories of third parties with whom we share that personal information.
  - The specific pieces of personal information we collected about you (also called a data portability request).
- ii. Deletion Request Rights.** You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete and direct our service providers to delete your personal information from our records, unless an exception applies. We may deny your



deletion request if retaining the information is necessary for us or our service providers to:

- Provide a good or service that you requested
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Fix functionality of the Site.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

**iii. Exercising Access, Data Portability, and Deletion Rights.** To exercise the access, data portability, and deletion rights, please submit a verifiability consumer request to us by contacting us at contact us at [info@thinkrga.com](mailto:info@thinkrga.com).

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.



- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time, we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

**g. Non-Discrimination.** We do not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

**h. Changes to Our CCPA Privacy Notice.** We reserve the right to amend this privacy notice in this Section 9 at our discretion and at any time. When we make changes to this



privacy notice, we will post the updated notice on the Site and update the effective date. Your continued use of the Site following the posting of changes constitutes your acceptance of such changes.

#### 10. **Your Data Protection Rights Under General Data Protection Regulation (GDPR).**

If you are a resident of the European Economic Area (EEA), you have certain data protection rights under the General Data Protection Regulation. This Section 10 supplements the other provisions of the Privacy Policy (except for Section 9) and applies solely to EEA residents. This Section is provided to comply with the GDPR and any terms defined in the GDPR have the same meaning when used in this Section.

RG+A aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your personal data. If you wish to be informed what personal data we hold about you and if you want it to be removed from our systems, please contact us at [info@thinkrga.com](mailto:info@thinkrga.com).

In certain circumstances, you have the following data protection rights:

- **The right to access, update or to delete** the information we have on you.
- **The right of rectification.** You have the right to have your information rectified if that information is inaccurate or incomplete.
- **The right to object.** You have the right to object to our processing of your personal data.
- **The right of restriction.** You have the right to request that we restrict the processing of your personal information.
- **The right to data portability.** You have the right to be provided with a copy of your personal data in a structured, machine-readable and commonly used format.
- **The right to withdraw consent.** You also have the right to withdraw your consent at any time where RG+A relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA), or the [European Data Protection Supervisor](#) about the processing of your personal data.

#### 11. **List of data sub-processors**

Our third-party service providers include:

- Go Daddy, Data Hosting, USA, [www.godaddy.com](http://www.godaddy.com)



- Google, Inc. Analytics, Online Advertising, Cloud Drive Integration, USA, [www.google.com](http://www.google.com)
- BootstrapCDN, Content Delivery, USA, <https://www.bootstrapcdn.com>
- Constant Contact, Inc., Email Marketing, USA, [www.constantcontact.com](http://www.constantcontact.com)

12. **Questions?** If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your information described in this Privacy Policy, your choices and rights regarding such use, or wish to exercise your rights under applicable law, please contact us at:

**Phone:** 267.744.6400

**Website:** <http://thinkrga.com/contact/>

**Email:** [info@thinkrga.com](mailto:info@thinkrga.com)

**Postal Address:** RG+A, 280 Union Square Drive, New Hope, PA 18938