

We are committed to protecting your privacy when you provide data to us. This Privacy Policy (“Privacy Statement” or “Statement”) sets out the privacy practices for Choreo, LLC and its affiliates, Choreo, LLC, Choreo Partner Alliance, LLC, Choreo Insurance Agency, LLC and Choreo Tax Services, LLC (“Choreo,” “us,” or “we”) with respect to information, including Personal Data (which means any information relating to an identified or identifiable natural person), we obtain from and about our employees, prospects, and clients.

Please read the information below to learn about the Personal Data collected about you and how it is used. The information we are collecting now will be treated consistently with this Statement. We may make changes to this Statement in the future, so please review the Statement regularly. Clients for whom we handle Personal Information under the federal Gramm-Leach-Bliley Act should also review our [GLBA Privacy Notice](#).

1. Personal Data Collected

1.1. Sources of Personal Data

Personal Data is collected directly from you when you:

- Complete an online form on our website
- Complete an employment application
- Respond to online event invitations
- Complete paper contact forms
- Call or email one of our locations

It is your responsibility to provide us with accurate data, and to provide us with updated Personal Data when it changes. We also collect information about you via automated means when you visit our website.

1.2. Categories of Personal Data

The Personal Data collected from you may include:

1.2.1. Identifiers

- Name
- Postal address
- Telephone number
- Facsimile number
- Email address

We use this information to:

- Stay in touch with you and manage our relationship
- Provide services to you
- Communicate with you about your requests, questions and comments
- Process employment applications
- Comply with legal and regulatory requirements, relevant industry standards, and our policies

1.2.2. Personal information categories described in the California Customer Records statute

- Social Security number
- Driver's license number
- Passport number
- Account number

We use this information to:

- Provide client services to you
- Manage and develop our relationship with you
- Complete transactions and process paperwork
- Protect against identity theft, prevent fraud, and other criminal activity

1.2.3. Characteristics of protected classifications

- Disability
- Familial status
- National origin
- Gender
- Ethnicity
- Race
- Religion

- Sex
- Age
- Veteran status

We use this information to:

- Process employment applications
- Manage and develop our relationship with you

1.2.4. Commercial information

- Financial information to complete a transaction

We use this information to:

- Manage and develop our relationship with you as a prospect and/or client

1.2.5. Biometric information

- Fingerprints

We use this information to:

- Currently we do not intentionally collect biometric information from individuals; however, occasionally we may incidentally come into possession of this information

1.2.6. Internet or other electronic network activity information

- IP addresses

We use this information to:

- Improve the functionality of our website
- Manage our business, diagnose technical and service problems, and identify users of our website
- Protect against identity theft, prevent fraud and other criminal activity
- Operate, evaluate, and improve our business
- Perform data analyses and other processing
- Manage and develop our relationship with you or the organization you represent

1.2.7. Professional or employment-related information

- Employment applications
- Service provider/vendor/third party agreements
- RFPs
- Due diligence questionnaires

We use this information to:

- Process employment applications
- Manage and develop our relationship with you and/or the organization you represent

1.2.8. Education information

- Employment applications

We use this information to:

- Process employment applications

2. With Whom We Share Personal Data

We do not sell or otherwise share personal information about you except as described in this Statement. We may share personal information with third parties who perform services on our behalf. These third parties are not authorized to use or disclose the information, except as necessary to perform services on our behalf or comply with legal requirements. We may also share the Personal Data we obtain with our affiliates.

We may disclose information about you:

- If we are required to do so by law, regulatory obligation, or legal process;
- In response to requests by government agencies, such as law enforcement authorities or regulatory bodies;
- For the purpose of or in connection with legal proceedings, or otherwise for the purpose of establishing, exercising, or defending our legal rights;
- When we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity; or

- In the event we sell or transfer all or a portion of our business or assets.

3. Retention of Data

We will keep your Personal Data only for as long as reasonably necessary to fulfill the purposes for which Personal Data is collected as stated herein; for as long as is necessary for the performance of the contract between you and us, if any; and to comply with legal and statutory obligations, such as in tax, regulatory, and corporate laws. When we no longer need your Personal Data for our purposes, including regulatory purposes, we will destroy, delete, or erase that Personal Data or convert it into an anonymous form.

4. Security of Data

We will take reasonable steps to protect your Personal Data in our possession from loss, misuse, unauthorized access, disclosure, alteration, and destruction. For example, we use security measures including safeguarding and monitoring our network and controlling access to our files, equipment, and buildings.

5. Your California Privacy Rights

If you are a resident of the state of California, the following rights are available to you under the California Consumer Privacy Act.

5.1. Right to access

You have the right to request that we disclose the categories of Personal Data collected (which may also be referenced in our GLBA Privacy Policy), the categories of sources from which Personal Data is collected, the business or commercial purpose for collection, the categories of third parties with which we share Personal Data, and the specific pieces of Personal Data that we have about you. You also have the right to request that we provide your Personal Data to you in a readily useable format.

5.2. Right to request deletion

You have the right to request that we delete Personal Data that we collected from you. Note, however, that certain requests to delete Personal Data may be denied if we are required to retain the information as a matter of law, the information is necessary for detecting security incidents, exercising free speech, protecting or defending against legal claims, or for internal uses reasonably aligned with consumer expectations.

5.3. Right to non-discrimination

You have the right not to receive discriminatory treatment by us for exercise of these privacy rights. We do not offer financial incentives related to the provision of data.

5.4. Authorized agent

You have the right to designate an authorized agent to make these requests on your behalf.

To exercise any of these rights, please call 1-888-312-2467, press Option 2 or email us at WMCompliance@choreoadvisors.com. Before we can begin to process your request, we must first verify your identity. We will use the following points of information for our verification process.

- A unique ID assigned to you by Choreo (e.g. Client ID, Vendor ID)
- Email Address
- Full Name
- Phone Number
- Mailing Address
- Employer, Service Provider, 3rd Party Vendor or Organization's Name you are associated with

Request made for categories of information about you require that we verify your identity using at least two of the points of information listed above. Requests made for specific information require that we use at least three points of information listed above. Additionally, you will be required to provide a document signed under penalty of perjury affirming that you are the consumer who you are making the information request about. For requests made for the deletion of information Choreo will require two or three of the points of information above, depending on the sensitivity of the information requested to be deleted.

6. Contact Information

Unless otherwise stated, Choreo, LLC is a data controller for Personal Data processed subject to this Statement. If you have any questions about this Statement or if you believe that your Personal Data has been processed or disclosed in violation of this Statement, please contact us by sending an email to WMCompliance@choreoadvisors.com, or a letter to:

Choreo, LLC

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