

## **Ryan, LLC Privacy Notice for California Residents**

**Effective Date:** January 1, 2020

**Last Reviewed On:** January 1, 2020

This **Privacy Notice for California Residents** (“Notice”) supplements the information contained in the Ryan, LLC (“Ryan”) Personal Data Protection Policy and applies solely to all clients, visitors, employees and other individuals who reside in the State of California (“consumers”<sup>1</sup> or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”).

### **Information We Collect**

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device (“Personal Information”). Personal Information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, including:
  - 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 (“FCRA”), the Gramm-Leach-Bliley Act (“GLBA”) or California Financial Information Privacy Act (“FIPA”), or the Driver’s Privacy Protection Act of 1994.

In particular, we have collected the following categories of Personal Information from our consumers within the last 12 months:

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<sup>1</sup> This definition shall include any other individuals that are a “consumer” pursuant to the CCPA.

Category	We Collect
<p>Identifiers</p> <ul style="list-style-type: none"> <li>• <i>Real name</i></li> <li>• <i>Alias</i></li> <li>• <i>Postal address</i></li> <li>• <i>Unique personal identifier</i></li> <li>• <i>Online identifier</i></li> <li>• <i>Internet Protocol Address</i></li> <li>• <i>Email address</i></li> <li>• <i>Account name</i></li> <li>• <i>Social security number</i></li> <li>• <i>Driver's license number</i></li> <li>• <i>Passport number, or</i></li> <li>• <i>Other similar identifiers</i></li> </ul>	<p>Yes</p>
<p>Information in Customer Records (<i>*some personal information in this category may overlap with other categories</i>)</p> <ul style="list-style-type: none"> <li>• <i>Name</i></li> <li>• <i>Signature</i></li> <li>• <i>Social security number</i></li> <li>• <i>Physical characteristics or description</i></li> <li>• <i>Address</i></li> <li>• <i>Telephone number</i></li> <li>• <i>Passport number</i></li> <li>• <i>Driver's license or state identification card number</i></li> <li>• <i>Insurance policy number</i></li> <li>• <i>Education</i></li> <li>• <i>Employment</i></li> <li>• <i>Employment history</i></li> <li>• <i>Bank account number</i></li> <li>• <i>Credit card number</i></li> <li>• <i>Debit card number</i></li> <li>• <i>Financial information</i></li> <li>• <i>Medical information health insurance information</i></li> </ul>	<p>Yes</p>

<p>Protected classification characteristics under California or federal law</p> <ul style="list-style-type: none"> <li>• <i>Race</i></li> <li>• <i>Color</i></li> <li>• <i>Sex</i></li> <li>• <i>Age</i></li> <li>• <i>Religion</i></li> <li>• <i>National original</i></li> <li>• <i>Disability</i></li> <li>• <i>Citizenship status</i></li> <li>• <i>Genetic information</i></li> </ul>	<p>Yes</p>
<p>Commercial Information</p> <ul style="list-style-type: none"> <li>• <i>Records of personal property, products or services purchased or obtained</i></li> <li>• <i>Records of personal property, products or services considered</i></li> <li>• <i>Purchasing or consuming histories or tendencies</i></li> </ul>	<p>Yes</p>
<p>Biometric information</p> <ul style="list-style-type: none"> <li>• <i>An individual's physiological, biological and behavioral characteristics that can be used, singly or in combination with other identifying data, to establish identity</i></li> <li>• <i>Includes:</i> <ul style="list-style-type: none"> <li>○ <i>Iris or retina scan or imagery</i></li> <li>○ <i>DNA</i></li> <li>○ <i>Fingerprint</i></li> <li>○ <i>Face, hand or palm print</i></li> <li>○ <i>Vein patterns</i></li> <li>○ <i>Voice recordings from which an identifier template can be extracted</i></li> <li>○ <i>Keystroke patterns or rhythms</i></li> <li>○ <i>Gait patterns or rhythms</i></li> <li>○ <i>Sleep, health or exercise data that contain identifying information</i></li> </ul> </li> </ul>	<p>Yes</p>
<p>Internet or other similar network activity</p> <ul style="list-style-type: none"> <li>• <i>Browsing history</i></li> <li>• <i>Search history</i></li> <li>• <i>Information regarding consumer's interaction with a website, application or advertisement</i></li> </ul>	<p>Yes</p>
<p>Geolocation data</p> <ul style="list-style-type: none"> <li>• <i>Physical location or movements</i></li> </ul>	<p>Yes</p>

<p>Sensory data</p> <ul style="list-style-type: none"> <li>• <i>Audio, electronic, visual, thermal, olfactory or similar information</i></li> </ul>	No
<p>Professional or employment-related information</p> <ul style="list-style-type: none"> <li>• <i>Current or past job history or performance evaluations</i></li> </ul>	Yes
<p>Non-public education information (per the <u>Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99)</u>)</p> <ul style="list-style-type: none"> <li>• <i>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</i></li> </ul>	Yes
<p>Inferences drawn from other personal information</p> <ul style="list-style-type: none"> <li>• <i>Profile reflecting the consumer's preferences, characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes</i></li> </ul>	Yes

In the preceding 12 months, we have obtained the categories of Personal Information listed above from the following categories of sources:

1. Directly from you
2. Affiliates
3. Directly from activity on Ryan's website or other applications
4. From third parties in connection with the services that Ryan provides
5. Government entities
6. Publicly accessible sources

**Use of Personal Information**

Ryan may use or disclose the Personal Information we collect for one or more of the following business purposes:

1. Providing Services

2. Communicating: Communicating with you, providing you with information relating to our services, providing information that you request, and responding to comments and questions
3. Fraud and Incident Prevention: Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity
4. Marketing: Marketing purposes, such as developing and providing advertising materials
5. In Response to Legal Process: To comply with applicable laws and legal obligations, including judicial proceedings, court orders, or other legal process
6. Audit Requests
7. Debugging: Debugging to identify and repair errors that impair existing intended functionality
8. Billing, Invoicing and Accounting
9. Management of Client Relationships
10. Payroll, Employee Benefits, Total Rewards and Compensation Administration
11. Management of Employment Process: Managing recruiting process, including background and other preemployment checks
12. Short Term, Transient Use

### **Collection and Disclosure of Personal Information**

Ryan may disclose your Personal Information to the following categories of third parties:

1. Governmental Bodies
2. Affiliates
3. Vendor and Service Providers
4. Third Parties as Legally Required: Third parties as required by law, including litigation parties and attorneys
5. Third Parties in Business Transactions: Third parties in connection with a merger, sale or asset transfer, dissolution, divestiture, reorganization or similar transaction
6. Third Parties with Consent: Third parties to whom you or your agents authorize us to disclose your Personal Information in connection with the services Ryan provides

## **Sale of Personal Information**

In the preceding 12 months, we have not sold any California resident's Personal Information, including Personal Information of minors under the age of 16. For purposes of this Notice, "sold" means the disclosure of Personal Information to a third party for monetary or other valuable consideration.

## **Your California Privacy Rights**

The CCPA provides consumers with specific rights regarding their Personal Information. This section describes your CCPA rights and explains how to exercise those rights.

### ***Access to Specific Information and Data Portability Rights***

You have the right to request that Ryan 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 (See "Exercising Access, Data Portability, and Deletion Rights"), we will disclose to you:

- The categories of Personal Information we collected about you.
- The categories of sources for the Personal Information we collected about you.
- Our business or commercial purpose for collecting 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).
- If we disclosed your Personal Information for a business purpose, a list disclosing disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

### ***Deletion Request Rights***

You have the right to request that Ryan delete any of your Personal Information that we collected from you and retained, subject to certain exceptions.

Ryan may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.

- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise a 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.

### ***Exercising Access, Data Portability, and Deletion Rights***

To exercise the access, data portability and deletion rights described above, please submit a verifiable consumer request to us by either:

- Visiting our website at <http://ryan.com/privacy/>
- Calling us at 1-800-419-2214: if calling between the hours of 7:00 am to 8:00 pm CST, please ask the Operator to connect you to the Vice President, Corporate Contracts, Legal; for calls outside these hours, please leave a detailed message on the general voicemail box
- Emailing us at [privacy@ryan.com](mailto:privacy@ryan.com)

We will respond to verifiable requests received from California residents as required by law. You can also designate an authorized agent to make a request under the CCPA on your behalf, but the agent must provide proof that the agent is authorized to make a request on your behalf.

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 agent.

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

In some instances, we may not be able to honor your request. For example, we will not honor your request if we cannot verify your identity or if we cannot verify that you have the authority to make the request on behalf of another individual. Additionally, we will not honor your request where an exception applies.

### ***Response Timing and Format***

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), 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 disclosure 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.

### ***Right to Equal Service and Price***

We will not discriminate against you if you exercise any of the rights described herein. Exercise of the rights will not result in us:

- Denying goods or services to you;
- Charging different prices or rates for goods or services, including through the use of discounts or other benefits or by imposing penalties;
- Providing a different level or quality of goods for services to you; or
- Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

### **Changes to Our Privacy Notice**

Ryan reserves the right to amend this Notice at our discretion at any time. When we make changes to this Notice, we will post the updated Notice on <http://ryan.com/privacy/> and update the Notice's effective date.

## **Contact Information**

If you have any questions or comments about this notice, the ways in which Ryan collects and uses your information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Ryan  
Three Galleria Tower  
13155 Noel Road  
Suite 100  
Dallas, Texas 75240-5090  
1-800-419-2214  
[\*\*privacy@ryan.com\*\*](mailto:privacy@ryan.com)