



**Global reach**  
Local knowledge

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## California Privacy Notice

**Personal Information under the California Consumer Privacy Act (CCPA).** TMF Group B.V. and its affiliated companies (“TMF”, “we”, “our” “us”) 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 or household as described in more detail below. Please note that this notice does not address or apply to our handling of:

- publicly available information made lawfully available by state or federal governments;
- personal information that is subject to an exemption under the CCPA;
- personal information we collect about job applicants, independent contractors, or current or former full-time, part-time and temporary employees and staff, officers, directors or owners of TMF; and
- personal information about individuals acting for or on behalf of another company, to the extent the information relates to our transactions with such company, products or services that we receive from or provide to such company, or associated communications or transactions (except that such individuals have the right to opt-out of any sale of their personal information and to not be subject to any discrimination for exercising such right).

**Categories of Personal Information Collected:** Our collection, use, and disclosure of personal information about a California resident will vary depending upon the circumstances and nature of our interactions or relationship with such resident, but in general, we collect the following categories of personal information:

- identifiers, such as online identifier, Internet Protocol (IP) address, or other similar identifiers;
- usage data, such as Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a resident’s interaction with an internet website, application, or advertisement;
- geolocation data – precise geographic location information about a particular individual or device; and
- profiles and inferences – inferences drawn from any of the information identified above to create a profile reflecting a resident’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.

**Source of Personal Information Collected:** We collect the above categories of personal information from you when you visit our website.

**Purposes for Collecting Personal Information:** We collect personal information for the following purposes:

- **Marketing** - for the purpose of advertising our services that may be of interest to you and making contact with you for marketing or other commercial purposes;
- **Analytics** - for analysing and improving the quality of our services and for customer optimization;
- **To operate and expand our business** - to operate and expand our business activities; to develop and improve or modify our services; to generate aggregated statistics about the users of our services; to assist in security and fraud prevention, to administer our website; for troubleshooting, data analysis, testing, research, and statistical purposes; to facilitate our business operations; to operate company policies and procedures; to enable us to engage in corporate transactions, such as any merger, sale, reorganization, transfer of our assets or businesses, acquisition, bankruptcy, or similar event; or for other legitimate business purposes permitted by applicable law; and
- **To comply with our legal obligations** –such as maintaining appropriate business records, complying with lawful requests by governmental agencies and public authorities, and to comply with applicable laws and regulations or as otherwise required by law.

**Purposes for Disclosing Personal Information:** We disclose personal information for the following the business/commercial purposes.

- to our affiliates to operate our business;
- to third-party service providers such as entities hosting our website or performing analytics;
- if we are obliged to disclose your personal information under applicable law or regulation, which may include laws outside your country of residence;
- in order to enforce or apply our website terms of use, or to protect the rights, privacy, safety or property of TMF, our clients, affiliates or other parties;
- subject to applicable laws, to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside your country of residence;
- in connection with the planning, due diligence and implementation of commercial transactions, including a reorganization, merger, sale of all or a portion of our assets, a joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings)—in such cases, your personal information will be transferred to the acquiring entity.

**Categories of Personal Information Disclosed for a Business Purpose or Sold**

The CCPA requires that we disclose the categories of personal information that we have disclosed for a business purpose and the categories of personal information that we have “sold” (as that term is defined under applicable laws) along with the categories of third parties to whom we have disclosed for a business purpose of sold such categories of personal information. Please see the table below for this information.

CCPA Categories of Personal Information We Collected in the Last 12 Months	To what categories of 3rd parties (if any) did we disclose for a business purpose(s) in last 12 months?	To what categories of 3rd parties (if any) did we sell in the last 12 months?
<p><b>Identifiers:</b> online identifier, Internet Protocol (IP) address, or other similar identifiers</p>	<ul style="list-style-type: none"> <li>• Affiliated entities</li> <li>• Service providers</li> <li>• Analytics companies</li> <li>• Regulatory agencies, government entities, and others as required by law</li> </ul>	<p>Analytics companies</p>

	<ul style="list-style-type: none"> <li>• Entities in connection with corporate transaction</li> </ul>
<p><b>Usage Data:</b> Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a resident's interaction with an internet website, application, or advertisement</p>	<ul style="list-style-type: none"> <li>• Affiliated entities</li> <li>• Service providers</li> <li>• Analytics companies</li> <li>• Regulatory agencies, government entities, and others as required by law</li> <li>• Entities in connection with corporate transaction</li> </ul>
<p><b>Geolocation Data:</b> Precise geographic location information about a particular individual or device</p>	<ul style="list-style-type: none"> <li>• Affiliated entities</li> <li>• Service providers</li> <li>• Analytics companies</li> <li>• Regulatory agencies, government entities, and others as required by law</li> <li>• Entities in connection with corporate transaction</li> </ul>
<p><b>Profiles and Inferences:</b> Inferences drawn from any of the information identified above to create a profile reflecting a resident's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes</p>	<ul style="list-style-type: none"> <li>• Affiliated entities</li> <li>• Service providers</li> <li>• Analytics companies</li> <li>• Regulatory agencies, government entities, and others as required by law</li> <li>• Entities in connection with corporate transaction</li> </ul>

Please note that while we do not disclose personal information to third parties in exchange for monetary compensation from such third parties, we do disclose or make available personal information to third parties, in order to receive certain services or benefits from them, such as when we allow third-party tags to collect information by making browsing information available to third party ad companies (through third party tags on our Websites) to improve and measure our ad campaigns and reach users with more relevant ads and content, some information only if you opt-in through our website's Cookie Consent or Cookie Settings (in the footer of this page). The CCPA defines a "sale" as disclosing or making available personal information to a third party in exchange for monetary or other valuable consideration. As defined by the CCPA, we may "sell" certain categories of personal information as noted above.

We do not knowingly sell information from individuals under the age of 16.

**California Privacy Rights.** If you reside in California, you have the right to:

- with respect to the personal information we have collected about you in the prior 12 months, to require that we disclose the following to you, up to twice per year and subject to certain exemptions:
  - categories of personal information collected;
  - categories of sources of personal information;
  - categories of personal information about you we have disclosed for a business purpose or sold;

- categories of third parties to whom we have sold or disclosed for a business purpose your personal information;
- the business or commercial purposes for collecting or selling personal information; and
- a copy of the specific pieces of personal information we have collected about you;
- request the deletion of your personal information that we collected, subject to certain exceptions under our retention policies;
- opt-out of the sale of your personal information (to opt-out, click on the Cookie Settings button at the bottom of this page and disable all options), if we sell it; and
- be free from discriminatory adverse treatment for exercising these rights.

**Instructions for Submitting Requests:** You or your authorized agent can submit your request by going to our general Privacy Statement at (<https://www.tmf-group.com/en/legal/privacy-statement/>) and clicking on “[exercise your rights](#)” link here or at the bottom of the same page, or by **calling us at +1 3053771200**. In general, we will verify your request and your identity by requesting you to disclose a copy of your valid ID (e.g. drivers license, national ID card or passport) through our automated [Exercise Your Rights](#) software, sending a verification request and a confirmation link to your email address. In some cases, we may request additional information in order to verify your request or where necessary to process your request. If we are unable to adequately verify a request, we will notify the requestor.

Authorized agents will be required to provide proof of their authorization and we may also require that the relevant consumer directly verify their identity and the authority of the authorized agent.

If you have questions or concerns about our privacy practices, you may contact us at [dataprotection@tmf-group.com](mailto:dataprotection@tmf-group.com).

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