



INNERCIRCLE

TECHNOLOGY ADVISORS

Privacy Policy

PREPARED FOR

InnerCircle Technology Advisors

Privacy Policy

Policy Statement

InnerCircle Technology Advisors is committed to the security of all personal data collected, stored, and processed within our systems. We have developed this Privacy Policy to advise you of the ways in which our organization collects, uses, shares, and protects your information.

Scope

This Privacy Policy applies to all employees and contractors of InnerCircle Technology Advisors along with customers and customer employees of InnerCircle Technology Advisors.

Personal Data We Collect

During the course of conducting business operations, InnerCircle Technology Advisors collects, stores and processes specific personal data including, but not limited to:

- Personal information regarding current, former, and prospective employees for the purposes of business operations, performing human resource administration, recruitment, and maintaining contact with the individual employees.
- Personal information regarding current, former, and prospective clients and their personal data for the purposes of providing services and support, maintaining client relationships, business operations and ongoing development of business activities.
- Personal information regarding our third parties, including vendors and service providers, and their personnel for the purposes of managing and maintaining business operations and business relationships with third parties.
- Personal information from publicly available resources in order to respond to inquiries or provide information related to business operations.
- Collected personal data may include: names, work addresses, work email addresses, work telephone number(s), title, company name, general contact information.

How We Use Personal Data Collected

InnerCircle Technology Advisors uses the Information collected from Users to respond to Users' questions and/or comments, market or provide products, services or information to Users, process Users' purchases, or provide related account status to the applicable User. InnerCircle Technology Advisors also may use Information collected from its Users to enforce its agreements with Users, prevent fraud and other prohibited or illegal activities, for other legally permissible purposes and generally to ensure that InnerCircle Technology Advisors complies with applicable laws.

Sharing of Personal Data

InnerCircle Technology Advisors does not sell Personal Data to third parties. Personal Data will not be shared with third parties, except as provided below. We may disclose Personal Data to the following categories of recipients:

- External services providers
- Subcontractors
- Professional advisors
- Public authorities and administrations
- Business partners of InnerCircle Technology Advisors
- Affiliated companies of InnerCircle Technology Advisors

Data Disclosure

InnerCircle Technology Advisors may disclose Personal Data in the following circumstances:

- In the event of a legal request and/or investigation when, in our opinion, such disclosure is necessary to prevent crime or fraud, or to comply with any statute, law, rule or regulation of any governmental authority or any order of any court of competent jurisdiction.
- If we outsource some or all of the operations of our business to third party service providers. In such cases, it may be necessary for us to disclose Personal Data to those service providers. Sometimes the service providers may process some Personal Data on behalf of and under the instructions of InnerCircle Technology Advisors. We restrict how such service providers may access, use, disclose, and protect that Personal Data
- In case of business transfers in the event of the sale or acquisition of companies, subsidiaries, or business units. In such transactions, Personal Data may be part of the transferred business assets but remain subject to the protections in any pre-existing privacy statement.
- When we believe release is appropriate or necessary to conduct the company's business, comply with the law, enforce, or apply our policies and other agreements, or protect the rights, property or safety of InnerCircle Technology Advisors, our employees, or others.

In such circumstances, InnerCircle Technology Advisors ensures that Personal Data is kept secure from unauthorized access and disclosure.

User Consent

Other than those circumstances as set out above, Users will receive notice when personal information might go to third parties, and Users will have an opportunity to choose not to share the information.

Access, Change, Deletion of Data

Individuals whose personal information is covered by this Privacy Policy have the right to access the personal information that InnerCircle Technology Advisors maintains about them. Individuals may contact us to correct, amend or delete such personal information if it is inaccurate (except when the burden or expense of providing access, correction, amendment, or deletion would be disproportionate to the risks to the individual's privacy, or where the rights of persons other than the individual would be violated). Requests for access, correction, amendment, or deletion should be sent to: privacy@innercircleit.com.

Security

InnerCircle Technology Advisors' site has commercially reasonable security measures to protect against the loss, theft, misuse, and alteration of Information that is submitted to us and remains under our control.

InnerCircle Technology Advisors makes no representations or warranties with regard to the sufficiency of its security measures. InnerCircle Technology Advisors shall not be responsible for any damages, including without limitation consequential damages, resulting from a lapse in compliance with this Privacy Policy as a result of a security breach or technical malfunction.

Certain information may be transmitted to you by email. Although it is illegal to intercept or disclose such messages under U.S. Federal law, such transmissions are not inherently secure.

Breach Notification Requirements

In the event of a breach of the confidentiality or security of your personal information, InnerCircle Technology Advisors will notify you if reasonably possible and as reasonably necessary under applicable law so that you can take appropriate protective steps. InnerCircle Technology Advisors may notify you under such circumstances using the email address or addresses that it has on record for you. You should also take care with how you handle and disclose your personal information.

Rights of Third Parties

This Privacy Policy does not create rights enforceable by third parties.

Non-HR Data Recourse, Enforcement and Liability

With regards to personal information, or information collected in the context of an employment relationship, we will cooperate with the appropriate data protection authorities and comply with the advice of such authorities.

Personal Data will not be transferred to third parties outside of the categories of recipients and circumstances set forth in the Sharing of Personal Data section above.

Information and Requests

For any information or requests concerning this Privacy Policy, please contact InnerCircle Technology Advisors using the below information.

- Call: +1 800-611-2960
- Email: privacy@innercircleit.com
- Write: InnerCircle Technology Advisors, 122 E 42nd St, 16th Fl, New York, NY 10168

Review and Amendment

This Privacy Policy will be reviewed annually or as needed to reflect changes in legal requirements, industry standards, or company operations. InnerCircle Technology Advisors may update this Privacy Policy at any time by publishing an updated version on our website, <https://www.innercircleit.com/privacy>.

Policy Approval

This Privacy Policy has been approved by InnerCircle Technology Advisors' executive management and is effective as of March 2024.