

## **Privacy Policy (Revised 12/14/21)**

Broderick & Company Consulting LLC (hereinafter collectively “Broderick & Company Consulting”) is committed to the protection of your personal information. This Privacy Policy sets out the basis on which Broderick & Company Consulting collects and uses personal information about you as part of our business activities.

This Privacy Policy describes in detail who is responsible for the personal information that Broderick & Company Consulting collects about you, what personal information is collected, how Broderick & Company Consulting uses such personal information, who Broderick & Company Consulting may disclose it to and your rights and choices in relation to your personal information.

This Privacy Policy generally covers information collected via [www.Broderick & Company Consulting.net](http://www.Broderick & Company Consulting.net) and any other subdomain, website or webpage that Broderick & Company Consulting may have in place now or in the future (collectively, the “Broderick & Company Consulting Website”), but also relates to information collected by Broderick & Company Consulting outside of the Broderick & Company Consulting Website including through the provision of services, online training, etc.

### **Who is Responsible for the Personal Information That Broderick & Company Consulting Collects?**

For the purposes of all relevant data protection laws, Broderick & Company Consulting is the data controller as to the personal information that is collected and used as part of its business activities. This is because Broderick & Company Consulting dictates the purpose for which your personal information is used and how Broderick & Company Consulting uses your personal information.

### **What Personal Information Does Broderick & Company Consulting Collect?**

While some of the information collected is required for business engagement purposes, other information is voluntarily given by you. The type of personal information that Broderick & Company Consulting may collect could include, but not limited to, the following:

- Your full name, e-mail address, phone number and email contact information;
- Your job title and the organization for which you work;
- Preference information, such as the communications you receive from us;
- Information you provide to us for the purposes of attending meetings, events, training, webinars and other programs; and
- Any other information relating to you (or other individuals) which you may provide to us.

If you are providing personal information to Broderick & Company Consulting relating to a third party, you confirm that you have the consent of the third party to share such personal information with Broderick & Company Consulting and that you have made the information in this Privacy Policy available to the third party.

### **Sensitive Categories of Information**

Some jurisdictions consider certain personal information particularly sensitive. Broderick & Company Consulting collects this data for statistical and reporting purposes only. This information may be required in order to create an account on our platforms, as some grantors require that we track the age of our participants. Broderick & Company Consulting does not share this information with third parties for business purposes; Broderick & Company Consulting only shares this information with grantors when required as a term of the grant. Such information may include the following:

- Date of birth
- *Aggregate and/or deidentified demographic information such as race, ethnicity, income and the like.*

### **Website Usage Information**

Broderick & Company Consulting collects information when you provide it to Broderick & Company Consulting, such as when you use the “contact us” feature on the Broderick & Company Consulting Website, register for access to services or otherwise communicate with Broderick & Company Consulting (such as by email or via Broderick & Company Consulting social media pages).

Broderick & Company Consulting collects certain information automatically when you use the Broderick & Company Consulting Website, such as your IP address and domain name, browser type, history of pages viewed and other usage information about your use of the Broderick & Company Consulting Website. Broderick & Company Consulting collects this information for site administration purposes, such as to analyze this data for trends and statistics. Broderick & Company Consulting may share statistical or aggregated non-personal information about its users with advertisers, business partners, sponsors and other third parties. This data is used to customize the Broderick & Company Consulting Website content and advertising to deliver a better experience to our users. Please see the section below on cookies for more information.

### **How Does Broderick & Company Consulting Obtain Your Personal Information?**

As noted above, we collect information from you in the course of your use of the Broderick & Company Consulting Website. For example, Broderick & Company Consulting collects information from you when you contact or communicate with Broderick & Company Consulting (including through the Broderick & Company Consulting Website, by email or otherwise) or when you register for access to services through Broderick & Company Consulting’s website.

Broderick & Company Consulting also collects your personal information while monitoring the Broderick & Company Consulting Website. Broderick & Company Consulting also gathers information about you when you provide it to us or interact with us directly.

**How Does Broderick & Company Consulting Use The Personal Information It Collects?**

Broderick & Company Consulting collects personal information for the following principal purposes; for each purpose, Broderick & Company Consulting has also set out below the legal basis under relevant data protection laws that we rely on to justify this use of your personal information.

Purpose	Legal Bases
<ul style="list-style-type: none"><li>To provide the Broderick &amp; Company Consulting Website and services through the website to you</li></ul>	<ul style="list-style-type: none"><li>For our legitimate business purposes (i.e., the provision of the Broderick &amp; Company Consulting Website) and, depending on the circumstances, to perform a contract between you and Broderick &amp; Company Consulting.</li></ul>
<ul style="list-style-type: none"><li>To communicate with you and to respond to questions that you have raised with Broderick &amp; Company Consulting;</li></ul>	<ul style="list-style-type: none"><li>For our legitimate business purposes (i.e., the provision of the Broderick &amp; Company Consulting Website).</li></ul>
<ul style="list-style-type: none"><li>To administer and improve the Broderick &amp; Company Consulting Website;</li></ul>	<ul style="list-style-type: none"><li>For our legitimate business purposes (i.e., the provision of the Broderick &amp; Company Consulting Website, as well as to improve and ensure the security of the Broderick &amp; Company Consulting Website). Broderick &amp;</li></ul>

---

Company Consulting may request your consent in circumstances where a legal justification over and above legitimate interests is required by applicable law (e.g., in relation to our use of certain cookies).

- 
- |   |   |
|---|---|
| <ul style="list-style-type: none"><li>● To process your payment for Broderick &amp; Company Consulting services, products and events;</li></ul> | <ul style="list-style-type: none"><li>● For our legitimate business purposes (i.e., the provision of the Broderick &amp; Company Consulting Website).</li></ul> |
|---|---|

- 
- |   |   |
|---|---|
| <ul style="list-style-type: none"><li>● To send you, or for our third-party partners to send you, information about products, services and events that may be of interest to you based on your preferences;</li></ul> | <ul style="list-style-type: none"><li>● For our legitimate business purposes (i.e., the provision of the Broderick &amp; Company Consulting Website). Broderick &amp; Company Consulting may request your consent in circumstances where a legal justification over and above legitimate interests is required by applicable law.</li></ul> |
|---|---|

- 
- |  |   |
|--|---|
| <ul style="list-style-type: none"><li>● To administer surveys;</li></ul> | <ul style="list-style-type: none"><li>● For our legitimate business purposes (i.e., the provision of the Broderick &amp; Company Consulting Website). Broderick &amp; Company Consulting may request your consent in circumstances where a legal justification over and above legitimate interests is required by applicable law.</li></ul> |
|--|---|
-

- 
- To prevent and detect fraud; and
  - For our legitimate business purposes and for compliance with legal obligations to which we are subject
- 
- To protect and enforce Broderick & Company Consulting's legal rights.
  - For our legitimate business purposes and for compliance with legal obligations to which we are subject

### **With Whom Does Broderick & Company Consulting Share Your Personal Information?**

Broderick & Company Consulting reserves the right to disclose and/or transfer personal information to a third party, if Broderick & Company Consulting has reason to believe that disclosing personal information is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) Broderick & Company Consulting rights or property, other Broderick & Company Consulting Website users or anyone else who could be harmed by such activities. Additionally, Broderick & Company Consulting may disclose personal information in response to a subpoena, warrant or other court order, or when Broderick & Company Consulting believes in good faith that a law, regulation, subpoena, warrant or other court order requires it.

Broderick & Company Consulting reserves the right to disclose and/or transfer personal information to a third party in the event of a proposed or actual purchase, sale (including a liquidation, realization, foreclosure or repossession), lease, merger, amalgamation or any other type of acquisition, disposal, transfer, conveyance or financing of all or any portion of Broderick & Company Consulting.

Broderick & Company Consulting may share your information with personal advisors, such as accountants, lawyers, and grantors, who assist us in carrying out our business activities.

Broderick & Company Consulting may share your information, including details about your engagement with a product (course completion percentage, level of participation, etc.) with your employer or other organization with which you are associated.

Broderick & Company Consulting may share personal information with third parties engaged to assist Broderick & Company Consulting in providing services to you or to carry out one or more of the purposes described above. These service providers are prohibited from using your personal information for any purpose other than to provide this assistance and are contractually required to protect personal information disclosed by Broderick & Company Consulting and to comply with the general privacy principles described in this Privacy Policy.

If you choose not to provide Broderick & Company Consulting with your personal information, you may still visit the Broderick & Company Consulting Website. However, you may be unable to access certain website options, such as use the Broderick & Company Consulting Website functionality to its fullest extent.

### **Your Rights, Including Removing, Correcting or Updating Personal Information**

If you change your mind on how Broderick & Company Consulting discloses or uses your information, or wish to access, correct or update personal information (such as your address), it will endeavor to correct, update or remove the personal data you give us.

### **THE BELOW TABLE APPLIES TO INDIVIDUALS LOCATED IN THE EU AND EEA ONLY:**

You have certain rights with respect to your personal information. The rights may only apply in certain circumstances and are subject to certain exemptions. Please see the table below for a summary of your rights and who to contact to exercise them.

	<b>Summary of your rights</b>	<b>Who to contact</b>
<b>Right of access to your personal information</b>	<p>You have the right to receive a copy of your personal information that we hold about you, subject to certain exemptions.</p> <p>Broderick &amp; Company Consulting may require further information in order to respond to your request (for instance, evidence of your identity and information to enable us to locate the specific personal information you require);</p>	Broderick & Company Consulting at info@broderickandco.com
<b>Right to rectify your personal information</b>	<p>You have the right to ask Broderick &amp; Company Consulting to correct your personal information that it holds where it is incorrect or incomplete.</p>	Broderick & Company Consulting at info@broderickandco.com

---

**Right to erasure of your personal information**

You have the right to ask that Broderick & Company Consulting delete your personal information in certain circumstances. For example (i) where your personal information is no longer necessary in relation to the purposes for which they were collected or otherwise used; (ii) if you withdraw your consent and there is no other legal ground for which Broderick & Company Consulting relies on for the continued use of your personal information; (iii) if you object to the use of your personal information (as set out below); (iv) if Broderick & Company Consulting has used your personal information unlawfully; or (v) if your personal information needs to be erased to comply with a legal obligation.

Broderick & Company Consulting at info@broderickandco.com

---

**Right to restrict the use of your personal information**

You have the right to suspend Broderick & Company Consulting's use of your personal information in certain circumstances. For example (i) where you think your personal information is inaccurate and only for such period to enable Broderick & Company Consulting to verify the accuracy of your personal information; (ii) the use of your personal information is unlawful and you oppose the erasure of your personal information and request that it is suspended instead; (iii) Broderick & Company Consulting no longer needs your personal information, but your personal information is required by you for the establishment, exercise or defense of legal claims; or (iv) you have objected to the use of your personal information and Broderick & Company Consulting is verifying whether its grounds for the use of your

You may effectuate this right at any time by contacting Broderick & Company Consulting at info@broderickandco.com

---

---

personal information override your objection.

---

**Right to data portability**

You have the right to obtain your personal information in a structured, commonly used and machine-readable format and for it to be transferred to another organization, where it is technically feasible. The right only applies where the use of your personal information is based on your consent or for the performance of a contract, and when the use of your personal information is carried out by automated (i.e. electronic) means.

You may effectuate this right at any time by contacting Broderick & Company Consulting at [info@broderickandco.com](mailto:info@broderickandco.com)

---

**Right to object to the use of your personal information**

You have the right to object to the use of your personal information in certain circumstances. For example (i) where you have grounds relating to your particular situation and Broderick & Company Consulting uses your personal information for our legitimate interests (or those of a third party); and (ii) if you object to the use of your personal information for direct marketing purposes.

You may effectuate this right at any time by contacting Broderick & Company Consulting at [info@broderickandco.com](mailto:info@broderickandco.com)

---

**Right to withdraw consent**

You have the right to withdraw your consent at any time where Broderick & Company Consulting relies on your consent to use your personal information.

You may effectuate this right at any time by contacting Broderick & Company Consulting at [info@broderickandco.com](mailto:info@broderickandco.com)

---



---

**Right to  
complain to  
the relevant  
data  
protection  
authority**

You have the right to complain to the relevant data protection authority where you think Broderick & Company Consulting has not used your personal information in accordance with data protection law.

Find your National Data Protection Authority online

**How Long Will Broderick & Company Consulting Keep Your Personal Information?**

Broderick & Company Consulting keeps your personal information for the period of time that you are a user of the Broderick & Company Consulting Website and for five (5) years after you discontinue use of the Broderick & Company Consulting Website.

**Links to Other Websites**

The Broderick & Company Consulting Website may contain links to other websites not controlled or legally affiliated with Broderick & Company Consulting. These sites are not controlled by Broderick & Company Consulting and Broderick & Company Consulting is not responsible for any content contained on any such website. Broderick & Company Consulting is not responsible for the privacy practices employed by other sites, and the privacy practices employed by such sites may not be the same as Broderick & Company Consulting's privacy practices. As with the Broderick & Company Consulting Website, you should become familiar with any external party's privacy policy before visiting and/or providing any personal information through any such site.

Broderick & Company Consulting may terminate access for any party who is found to repeatedly provide or post protected material without necessary rights and permissions.

**Cookies**

Broderick & Company Consulting uses cookies to manage its website. A cookie is a small file placed on your computer when you visit a website. Cookies are used to store information to manage your website experience such as your type of web browser. A cookie can also store preference information to customize your website experience.

Cookies help us understand how parties use our website so Broderick & Company Consulting can design better services in the future. You can adjust your web browser to disable cookies. However, Broderick & Company Consulting may not be able to provide you with all the services or functionality available on the Broderick & Company Consulting Website if you choose to disable cookies.

You may also remove Broderick & Company Consulting cookies from your browser. Please refer to your browser's help menu for instructions.

**Contacting Broderick & Company Consulting with Questions, Concerns or Complaints**

Should you have any questions, concerns or a complaint about this Privacy Policy, please contact Broderick & Company Consulting at [info@broderickandco.com](mailto:info@broderickandco.com). You are entitled to make an anonymous complaint or inquiry in relation to this Privacy Policy or your privacy rights; however, Broderick & Company Consulting may require you to identify yourself if required by law or it is impracticable for us to deal with your matter otherwise.

**Broderick & Company Consulting Website and Communications Terms of Use**

Please refer to Broderick & Company Consulting's Terms of Use and/or Terms and Conditions on all issues related to accessing, posting and sharing information through the Broderick & Company Consulting Website and communication services.

**Changes to The Broderick & Company Consulting Privacy Policy**

Any material changes to the Privacy Policy will be posted on this page. The updated Privacy Policy will take effect as soon as it has been posted.