

Effective and Last Updated: April 30th, 2024

This privacy policy (the “Policy”) describes how Carlton Fields, LLP, Carlton Fields P.A., Core Triangle Consulting, LLC, Centennial Consulting, LLC, and CF Compliance Consulting Group, LLC (collectively, “Carlton Fields,” “we,” “us,” or “our”) collects, uses, and/or discloses your Personal Information (i.e., 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 individual). Personal Information does not include deidentified or aggregate data, which we may collect, use, and disclose, but which is outside the scope of this Policy. This Policy also does not apply to information we process on behalf of our clients in our role as a service provider.

Personal Information We Collect

See below for the Personal Information we collect, where we get it, and why.

What Personal Information We Collect	Where We Get It	Why We Collect It
Identifiers such as a real name, alias, postal address, Internet Protocol address, email address.	The consumer directly and/or our attorneys or consultants.	To provide our services, to conduct data analysis, marketing, and market research.
Categories of personal information described in Cal. Civ. Code § 1798.80(e) , such as name, signature, social security number, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.	The consumer directly and/or our attorneys or consultants.	To provide our services, to conduct data analysis, marketing, market research, and as required by law.
Commercial information, including products or services purchased, obtained, or considered.	The consumer directly.	To provide our services, marketing and market research.
Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement.	The consumer directly and from marketing and analytics providers.	<ul style="list-style-type: none">• To provide our services.• To conduct data analysis, marketing, and market research.• For security and fraud prevention.
Geolocation data.	The consumer directly and from marketing and analytics providers.	To provide our services, to conduct data analysis, marketing, and market research.
Inferences drawn from any of the information identified in this chart to	Marketing and analytics providers.	Marketing and market research.

What Personal Information We Collect	Where We Get It	Why We Collect It
create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.		

Disclosure of Personal Information

Personal Information We Disclose	To Whom We Disclose It	Why We Disclose It
Identifiers such as a real name, alias, postal address, Internet Protocol address, email address.	<ul style="list-style-type: none"> Marketing providers and event partners Service Providers Public entities (e.g., regulatory authorities) Professional advisors including law firms, accountants, auditors, insurers, and tax advisors Internet Service Providers 	<ul style="list-style-type: none"> To provide our services. To conduct data analysis, marketing, and market research.
Categories of personal information described in subdivision (e) of Section 1798.80.	<ul style="list-style-type: none"> Service Providers Marketing providers and event partners Public entities (e.g., regulatory authorities) Professional advisors including law firms, accountants, auditors, insurers, and tax advisors; 	<ul style="list-style-type: none"> To provide our services. To conduct data analysis, marketing, and market research For security and fraud prevention
Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.	<ul style="list-style-type: none"> Data analytics providers and marketing providers. Service Providers Internet Service Providers Public entities (e.g., regulatory authorities) 	<ul style="list-style-type: none"> To provide our services. To conduct data analysis, marketing, and market research For security and fraud prevention
Geolocation data.	Data analytics providers and marketing providers.	<ul style="list-style-type: none"> To provide our services. To conduct data analysis, marketing, and market research.

In addition, we may disclose your Personal Information under the following circumstances:

- **Business Partners.** We may disclose your Personal Information to business partners that assist us in providing you the services you request.
- **With your consent.**
- **Security and fraud prevention.** To maintain security and integrity of Carlton Fields' websites, networks and systems.

- **Without your consent.** In some circumstances, we may be required to disclose your Personal Information without your consent such as to comply with applicable legal or regulatory requirements, such as legal (state and federal) and internal company reporting obligations, including headcount, management information, demographic and health, safety, security, and environmental reporting. We may also disclose your Personal Information to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- **Corporate transactions.** To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us is among the assets transferred.

We do not use or disclose sensitive Personal Information for purposes beyond the uses permitted by law, and we do not sell or share Personal Information, including Personal Information about minors under the age of 16. We endeavor to ensure that our service providers implement reasonable and appropriate technical and organizational measures to provide an adequate level of protection for your Personal Information.

Your Rights and Choices

Although only certain states provide residents with particular privacy rights regarding their Personal Information, Carlton Fields, as a courtesy, extends these rights to clients irrespective of their state residence, unless otherwise noted. This section describes those rights and explains how to exercise them.

In accordance with our policies and procedures, we will not discriminate or retaliate against you if you choose to exercise any of your rights described in this section.

Right to Know, Access, and/or Port

We provide the right to request confirmation of our processing of your Personal Information and provide you access to certain information about our collection and use of your Personal Information (the "Right to Access"). Once we receive your request and confirm your identity, 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.
- If we disclosed your Personal Information for a business purpose, identifying the Personal Information categories that each category of recipient obtained.
- The specific pieces of Personal Information we collected about you.

You may also request that we, to the extent technically feasible, provide you a copy of your Personal Information in a portable, readily usable format.

Right to Delete

We provide the right to delete any of your Personal Information that we collected from you and retained, subject to certain exceptions (the "Right to Delete"). Once we receive your request and verify your identity, we will review your request to see if an exception allowing us to retain the information applies. Under certain circumstances, we may deny your deletion request. If we deny your request we will notify you of the reason for our denial.

Right to Correct

We provide the right to correct inaccurate Personal Information in our files, subject to certain

exceptions (the "Right to Correct"). Once we receive your request and verify your identity, we will review your request to see if an exception applies.

Exercising Your Rights and Choices

To Exercise

To exercise your rights as described above, you, or someone legally authorized to act on your behalf, may submit a request by either:

- Emailing us at info@carltonfields.com;
- Calling us at 844.316.3866 or
- Submitting a request [here](#).

Upon receiving your request, we may request additional information from you to verify your identity (e.g., the types of services you requested from Carlton Fields, individuals with whom you work, or other information regarding your interactions with us). We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request.

We will only use Personal Information provided in the request to verify the requestor's identity or authority to make it.

If you disagree with a decision that we make with respect to a request made under this policy and you reside in Virginia, Connecticut, Colorado, or Montana you can appeal our decision by emailing us at info@carltonfields.com.

Retention of Personal Information

Personal Information will not be kept for longer than reasonably necessary for the business purpose for which it is collected and processed and will be retained in accordance with our legal obligations pertaining to the category of record (i.e., the documents or files) containing the personal information. The retention period depends on criteria such as the nature of our relationship with you (e.g., whether you are a current or former client), when you last interacted with us, the type of personal information at issue, and legal considerations.

Changes to Our Privacy Policy

We reserve the right to amend this Privacy Policy at our discretion and at any time. When we make changes to this Privacy Policy, we will post the updated notice on the Carlton Fields website and update the notice's effective date.

Contact Information

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

Phone: 844.316.3866

Email: info@carltonfields.com

Postal Address:

4221 West Boy Scout Boulevard
Suite 1000
Tampa, FL 33607