



PRIVACY POLICY

PLEASE READ THIS PRIVACY POLICY CAREFULLY TO UNDERSTAND HOW WE TREAT YOUR PERSONAL INFORMATION AND WHAT CHOICES AND RIGHTS YOU HAVE IN THIS REGARD. IF YOU DO NOT AGREE WITH THIS POLICY AND OUR TERMS AND CONDITIONS, YOU SHOULD NOT ACCESS OR USE OUR SITE OR ENGAGE IN COMMUNICATIONS WITH US CONCERNING OUR SERVICES. BY USING OUR SITE OR SERVICES, YOU AGREE TO THIS PRIVACY POLICY. OUR SITE IS INTENDED FOR USERS LOCATED IN THE UNITED STATES AND IS NOT INTENDED FOR USERS LOCATED IN OTHER COUNTRIES, INCLUDING THE EUROPEAN UNION AND THE EUROPEAN ECONOMIC AREA.

1.0 Introduction and Purpose

Whitman, Requardt and Associates, LLP (also referred to herein as “WRA,” “we,” “us,” or “our”) is committed to protecting the privacy and security of the personal information we collect, use, share, and otherwise process as part of our business. This Privacy Policy (the “**Policy**”) describes how WRA processes and uses the personal information that we collect through our website, www.wrallp.com, as well as other websites that direct to or otherwise contain a link to this Privacy Policy (collectively the “**Site**”), or that you otherwise provide to us in connection with our products, devices, software, and services (the “**Services**”).

This Privacy Policy governs your use of our Site and Services. By using our Site or Services, you hereby acknowledge and agree to this Privacy Policy.

2.0 Information We May Collect

We may collect and process the following types of personal information from you for the purposes listed below. The information we collect depends upon things such as the nature of our relationship, the method through which you communicate with us, the Services you use, the purpose for your interaction with us, and the choices you make.

We collect information about you from various sources and in various ways when you use our Site and Services, including information you provide directly, information collected automatically, information from third-party data sources, and data we infer or generate from other data. We may also collect information from third parties, including references, former employers, government agencies, background check providers, credit bureaus, publicly available resources, websites, and others.

- **Contact Information:** If you contact us through the Site, sign up for communications, request information, or otherwise communicate with us, we may collect your name, company (if any), email address, telephone number, postal address, and the contents of your message or inquiry
- **Careers Site and Job Applications:** If you apply for a job or internship with WRA via the WRA careers page (“Careers Site”) (hosted by ADP), we may collect information typically requested during recruiting and hiring, including:
 - Job Applicant Information. In connection with recruiting and hiring, we collect information you provide and information generated or obtained during the process, including: full name, email address, phone number, and physical address; résumé/CV, cover letters, employment history, education, skills, licenses/certifications, references, eligibility to work, desired compensation, preferences, and related application materials; and communications with us about your candidacy.
 - EEO/DEI Self-Identification (Voluntary). Where permitted or required by law, you may (but are not required to) provide information for equal employment opportunity and diversity reporting, such as race, gender, disability status, and veteran status. We use this information only for lawful reporting, analytics, and monitoring, and we do not use it in hiring decisions.

- Background Screening Information. If you advance to background screening, we collect and use information necessary to complete screenings and verify identity and right-to-work (e.g., date of birth, Social Security number or other government identifiers, copies of government-issued identification, prior employment/education verification, and results from screening vendors), as permitted by law and, where required, with your consent. We may obtain background information from third-party providers, references, former employers, and publicly available sources.
- Sensitive Personal Information. In the recruiting and hiring context, we may process “sensitive” personal information under applicable laws (e.g., Social Security number or other government identifiers, date of birth, and EEO/DEI self-identification data). We use such information only for limited purposes permitted by law—such as to conduct background screening, verify identity and work authorization, comply with equal employment opportunity requirements under federal and state law (including Title VII of the Civil Rights Act and applicable Maryland fair employment laws), maintain appropriate records, ensure the security and integrity of our systems, and prevent fraud. We implement appropriate safeguards to protect sensitive personal information, including limiting access to authorized personnel with a legitimate business need. We do not use or disclose sensitive personal information for purposes that require an opportunity to limit under California law (such as for targeted advertising).

For applicants, you may object to our collection of certain data; however, some information is mandatory to process your application. If you do not provide required information, we will not be able to evaluate your candidacy. The information about you will be added to our candidate database and retained in accordance with our record retention policies and applicable law. If you do not wish to be included in our candidate database for future opportunities, please contact us at careers@wrallp.com. You may request deletion of your information as described in the "Your Rights and Choices" section below, subject to our legal obligations to retain certain records.

- **Usage Information:** When you visit the Site, view or search content, install applications or software, create or log into your account, or use our Services, we and our third-party service providers may automatically collect certain usage or network activity information from your browser, mobile device, computer, tablet, or other devices or browsers you use, which includes the date and time of your visit, your Internet Protocol (IP) address, unique device identifier, domain server, your browser type, operating system, the referring web page, access time, cookies, and data about which pages you visit. We may also collect information regarding your interactions with the Services or our advertising. For more information about cookies and similar technologies, see Section 5 below.
- **Social Media Information:** If you engage with us on third-party social media platforms, such as LinkedIn and Facebook, we may collect and aggregate the personal information through your engagement with us, including all content, messages, and information that you provide to us and that you make publicly available on the profile through which you submitted such information to us.
- **Communications Data:** If you contribute to the Site, provide us with feedback, ask us questions, or otherwise communicate with us, in addition to your Contact Information, we may collect the subject matter of your message, any comments, content, or other information that you choose to provide, and other information needed to respond to your communication. If you receive email communications from us, we may use certain tools to capture data related to if/when you open our message and if/when you click on any links or banners that may be contained within our emails to you.

When you are asked to provide your information, you may choose not to provide us with your information or otherwise decline or use browser or device controls to prevent certain types of data collection. However, in some cases, if you choose not to provide information that is necessary to fulfill your requests or provide our Services, you may not be able to access portions of the Site, or some Services or features may not be available or fully functional. Certain information may be required by law or necessary for us to provide Services you request.

3.0 How We May Use Your Information

We may use the information described above, including any personal information, in connection with the following business or commercial purposes or otherwise to the extent permitted by law:

- **Providing Our Products and Services To You:** We use your information to provide our products and Services, which includes making our Site, Services, and our content available to you, to serve you the content and functionality you request, to provide and deliver products, troubleshooting, and personalizing our Services, to offer you goods and services which may be of benefit to you, to communicate about our Services and respond to your feedback, requests, questions, or inquiries, to enhance your experience and provide you with a more personalized and interactive experience, to improve and develop existing and new Services, including evaluations of functionality and features and recognizing your devices and remembering your preferences and interactions, and to ensure the privacy and security of our Site, Services, and operations.
- **Recruiting and Hiring:** We use your information to receive, review, and evaluate your application; assess your capabilities and qualifications for a job; communicate with you as an applicant, including responding to your inquiries about your application; facilitate background checks and onboarding if an offer is extended; maintain hiring records; and comply with applicable employment and equal opportunity laws.
- **Additional HR Processing Activities:** We process applicant information for routine personnel and human resources management (before, during, and after the hiring process); operations management (including maintaining internal systems, analytics to improve recruiting processes, accounting/auditing, insurance, and risk management); security management (including site, network, and information security and fraud prevention); and legal and regulatory compliance (including equal opportunity reporting, recordkeeping, responding to lawful requests, and establishing, exercising, or defending legal claims).
- **Operating Our Business:** We use your information to operate our business, such as to obtain or maintain insurance coverage; manage risks; obtain professional advice; to mitigate risks to the privacy and security of our Site, Services, and operations, including fraud or phishing detection; to maintain our databases and back-ups; to comply with any contractual obligations; to manage our relationships with you; and to comply with your instructions or requests.
- **Communicating With You:** We use your information to communicate with you, such as to contact you directly by mail, telephone, email, SMS, or other electronic messaging service in order to respond and provide the appropriate assistance and response to you; to extend offers of goods and services or information that may be of interest to you; to keep records of our communications with you; to determine user interests; for usage analytics purposes; and to administer a promotion, survey, or other customer engagement features. You may unsubscribe from marketing communications at any time by following the unsubscribe instructions in our emails or by contacting us at privacy@wrallp.com. Please see the "Your Rights and Choices Regarding Your Personal Information" Section of this Policy for more information. Please note that even if you opt out of marketing communications, we may still send you transactional or relationship messages, such as those about your account or our ongoing business relations.
- **Fraud, Security, Legal Enforcement and Compliance:** We use your information to protect the security and integrity of our business, the Site, and our Services, such as to enforce our agreements with you, to comply with federal, state, or local laws; to comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons; to cooperate with law enforcement agencies concerning conduct or activity that we may believe violates applicable law; and to establish, exercise, defend legal rights or claims, whether in court, administrative, or other proceedings.

We may create, disclose, and otherwise use information as de-identified or aggregated data. Once properly de-identified or aggregated in accordance with applicable standards, such data is no longer treated as personal information subject to this Policy.

4.0 How We May Disclose Your Information

We may disclose or share your personal information described above to the following types of third-parties:

- **Service Providers:** We may share your personal information with our third-party service providers who perform functions on our behalf or at your direction for the purposes described in this Policy. We require these service providers to maintain the confidentiality and security of personal information they process on our behalf and to use personal information only for the purposes for which we disclose it to them. This includes, but is not limited to, development, administration, and maintenance of the Site and Careers Site, to support our provision of Services requested by you, to provide applicant tracking and background screening, to provide technical support, to send marketing, promotions, and communications to you about our Services, to enhance the security of our Site, for marketing or advertising services, and to assist with other legitimate purposes permitted by law.
- **Recruiting and Hiring Personnel:** We may share your personal information with affiliates and/or partners that are involved in evaluating candidates for a given position. We will make the information available to personnel with a business need to know the information, including personnel in the recruiting, human resources, and information technology departments, and in the department responsible for the position for which you are applying.
- **Corporate Affiliates:** We may share your personal information with our subsidiaries or affiliates, and with their respective officers, directors, employees, accountants, attorneys, and agents.
- **Acquisition and Similar Transactions:** If we sell, transfer, or otherwise share some or all of our assets in connection with a merger, reorganization, liquidation, dissolution, bankruptcy, or sale of assets, we may disclose your personal information as a part of the assets transferred as a result of the transaction. For example, if another company acquires us, we will share your personal information with that company.
- **In Response to Legal Process or Defending Legal Claims:** We may disclose personal information as required by law, court orders, subpoena, or other legal process or if we reasonably believe such action is necessary to comply with the laws.
- **Professional Advisors:** We may share your personal information with our attorneys, accountants, and/or other fiduciaries and consultants that need access to your information to provide operational or other support on our behalf.
- **With Your Consent or at Your Direction:** We may ask, from time to time, if you would like us to share your personal information with other unaffiliated third parties who are not described elsewhere in this Policy. We may disclose your information in this context with your permission or upon your direction.
- **Third Parties:** We may provide personal information about you to third parties that may offer services specifically requested by you.
- **Deidentified or Aggregated Data:** We may share aggregated information, and information that does not identify any specific individual, such as groupings of demographic data and customer preferences, (i) for compliance with reporting obligations; (ii) for business or marketing purposes; and (iii) to assist us and others in understanding our users' interests, habits, and usage patterns for certain programs, content, services, and/or functionality.

5.0 Cookies and Similar Technologies

A "cookie" is a small file created by a web server that can be stored on your device (if you allow) for use either during a particular browsing session (a "session" cookie) or a future browsing session (a "persistent" or "permanent" cookie). "Session" cookies are temporarily stored on your device and only last until they expire at the end of your browsing session. "Persistent" or "permanent" cookies remain stored on your device until they expire or are deleted by you. Local stored objects (or "flash" cookies) are used to collect and store information about your preferences and navigation to, from, and on a website. First-party cookies are set by the website you are visiting, and they can only be read by that site. Third-party cookies are set by a party other than that website.

In addition to cookies, there are other data collection technologies, such as Internet tags, web beacons, pixels, (clear gifs, pixel tags, and single-pixel gifs), and navigational data collection (log files, server logs, etc.) that can be used to collect data as you navigate through and interact with a

website. For example, web beacons are tiny graphics with unique identifiers that are used to understand browsing activity. UTM codes are strings that can appear in a URL when you move from one web page or website to another. The string can represent information about your browsing, such as which advertisement, page, or publisher sent you to the receiving website.

5.1.1 What Cookies and Similar Technologies Do We Use and Why Do We Use Them?

To optimize the user experience and with your consent where required by law, our Site and Careers Site use cookies and similar tracking technologies to operate core features, understand usage, improve performance and design, and enhance security. The technologies we use may include cookies, web beacons (also called pixel tags or clear GIFs), local storage, SDKs, and tags/scripts. These technologies may collect information such as device identifiers, browser type and settings, operating system, IP address (which may be considered personal information under applicable law), general location, referring/exit pages, pages viewed, links clicked, time spent, and other interactions with the Site and Careers Site.

Cookies may be set by WRA (first-party) and by third parties that provide services to us (third-party), including our hosting, analytics, security, and recruiting vendors. The Careers Site is hosted by ADP, which may deploy its own cookies and similar technologies to operate applicant accounts and workflows. Please review ADP's applicable terms and privacy/cookie disclosures presented within the Careers Site.

The cookies and similar technologies used on the Site include the following:

Essential: Essential cookies are strictly necessary for basic features and functionality of the Site and do not require your consent. Without these essential cookies, the Site will not perform properly and we may not be able to provide you with certain Services you have asked for, provide access to secure areas, and choices you have made for better functionality cannot be provided.

Functionality: Functionality cookies help us customize content on the Site based on your preferences. We use functionality cookies to remember choices you've made or information you've provided, such as your username or the region you are in. This allows us to tailor your experience on the Site to your preferences.

Analytics and Performance: We use analytics and performance cookies to collect information about how you use the Site, including which pages you go to most often and if users receive error messages from certain pages in order to help us fix technical issues or errors and highlight areas where we can improve the Site. These cookies are not used to target you with online marketing and advertising. You may also encounter third-party analytics and performance cookies on our Site which may gather browsing activity (such as information you have entered or choices you have made) across numerous websites that you visit and across numerous browsing sessions. These cookies also help improve how our Site functions and performs, customizes your interaction with our Site, and may help provide more relevant messaging and marketing communications to you.

We also use third-party digital tracking technologies and receive data from such technologies including, but not limited to, the following:

Google Analytics. We use Google Analytics to collect and process statistical data about the number of people using the Site and to better understand how they find and use the Site. The data collected includes data related to your device/browser, your IP address, and on-site activities, such as what pages were visited or how often, to measure and report statistics about user interactions. The information stored is reduced to a random identifier. Any data collected is used in accordance with this Policy and Google's privacy policy. You may learn more about Google Analytics by visiting:

<https://www.google.com/policies/privacy/partners/> and
<https://support.google.com/analytics/answer/6004245>

Your Choices and Controls

Most web browsers are set by default to accept cookies. If you do not wish to receive cookies, you may set your browser to refuse all or some types of cookies or to alert you when cookies are being stored. These settings may affect your enjoyment of the Website's functionality. In addition, adjusting the cookie settings may not fully delete all of the cookies that have already been created. To delete them, you should review your web browser settings after you have changed your cookie settings. The links below provide additional information about how to disable cookies or manage the cookie settings:

- [Google Chrome](#)
- [Firefox](#)
- [Microsoft Edge](#)
- Safari for [Mac](#) and [iPhone](#)

You may learn more about internet advertising practices and related consumer resources at <https://youradchoices.com/control>, <https://thenai.org/about-online-advertising/faq>, and <http://www.networkadvertising.org/choices>.

6.0 Careers Site

Our Careers Site is provided by ADP. Information you submit there is used for recruiting, hiring, and compliance purposes. ADP acts as our service provider for applicant accounts and workflows. ADP may deploy its own cookies and similar technologies within the Careers Site. Please review ADP's [terms](#) and [privacy](#) disclosures presented within the Careers Site for more information about ADP's practices.

If you create an applicant account on the Careers Site, you may access and update certain information by logging into that account. For other requests, please see the "Your Rights and Choices Regarding Your Personal Information" Section of this Policy for more information.

7.0 Retention of Personal Information

We retain your personal information only for as long as is necessary to fulfill the purposes for which it was collected, to comply with our business requirements and legal obligations, to resolve disputes, to protect our assets, to provide our services, and to enforce our agreements. Specific retention periods vary based on the type of information and applicable legal requirements.

We take reasonable steps to delete the personal information we collect when: (1) we have a legal obligation to do so; (2) we no longer have a purpose for retaining the information; or (3) if you ask us to delete your personal information unless we determine that doing so would violate our existing, legitimate, legal, regulatory, dispute resolution, contractual, or similar obligations. We may also delete your information if we believe it is incomplete, inaccurate, or that our continued storage of it is contrary to our objectives or legal obligations.

For applicants, we retain information in accordance with applicable retention schedules and equal opportunity and recordkeeping requirements. We may remove personal information for inactive accounts, subject to any applicable legal or regulatory obligations. Further, we may delete personal information about you (including your CV/résumé) from our database at any time and without providing any reason.

8.0 Security and Protection of Personal Information

We recognize the importance of safeguarding your personal information and we endeavor to maintain reasonable appropriate physical, technical, and organizational safeguards to protect your personal information against accidental loss and unauthorized access, use, alteration, or disclosure, and to detect fraudulent identity verification activity and mitigate risks concerning your personal information.

While our security measures seek to protect your information in our possession, no security system is perfect, and no data transmission is 100% secure. As a result, while we strive to protect your information, we cannot guarantee or warrant the security of any information transmitted to or from the Site, or otherwise through our Services. We are not responsible for circumvention of any privacy settings or security measures contained on the Site.

9.0 Your Rights and Choices Regarding Your Personal Information

Please use the “Contact Us” details provided at the end of this Policy to exercise your rights and choices under this Policy. We honor requests when we are required to do so under applicable law.

Email Opt-Out. If you no longer wish to receive communications from us via email, you may opt-out by clicking the “unsubscribe” link at the bottom of our emails, and you may opt-out of other communications by contacting us via the “Contact Us” details at the end of this Policy and providing your name and email address so that we may identify you in the opt-out process. Once we receive your instruction, we will promptly take corrective action.

Cookies. You may be able to set your browser to refuse all or some browser cookies or to alert you when cookies are being sent. You may also adjust your cookie preferences by using the cookies consent banner, if available.

Accuracy and Updating Your Information. Our goal is to keep your personal information accurate, current, and complete. If you have a Careers Site account, you may update certain information by logging in, or by letting us know via the “Contact Us” details at the end of this Policy. We are not responsible for any losses arising from any inaccurate, inauthentic, deficient, or incomplete personal information that you provide to us.

Careers Site Account. If you register on the Careers Site, you may access, review, and change your personal information stored therein by logging into the Careers Site and updating your account information.

Do Not Track. Some web browsers may transmit “Do Not Track” signals to the websites and other online services with which the browser communicates. We do not currently recognize browser settings or signals of tracking preferences, which may include “Do Not Track” instructions.

Complaints. If you believe your rights relating to your personal information have been violated, please contact us via the “Contact Us” details provided at the end of this Policy.

California Residents. Under California Civil Code Section 1798.83, California residents who provide personal information in obtaining products or services for personal, family, or household use may be entitled to request and obtain from us once each calendar year information about the information we shared, if any, with other businesses for direct marketing uses. We do not currently share your personal information with third parties for those third parties’ direct marketing purposes. Please be aware that not all information sharing is covered by California’s “Shine the Light” requirements, and only information regarding covered sharing (if any) will be included in our response. As a part of the California Online Privacy Protection Act, all users of our Site may make any changes to their information at any time by contacting us at privacy@wralp.com.

10.0 Individual Rights

To the extent you are a resident of certain U.S. states with comprehensive state privacy laws, you may be eligible for one or more of the following consumer rights where authorized by applicable U.S. state privacy laws. This section provides an overview of these rights which we honor where required by applicable law:

- **Right to Access.** Subject to certain conditions set forth in the applicable U.S. state privacy laws, you have the right to know and see what personal information we have collected about you and receive a copy of such information in a portable format, purposes for which we collect your personal information, recipients of your personal information to whom we disclose or share, which in some states may include categories of personal information collected, categories of sources of collection, business or commercial purposes for data processing, and categories of third parties with whom we disclose that information.
- **Right to Correct.** Subject to certain conditions and exceptions set forth in the applicable U.S. state privacy laws, you have the right to request that we correct any inaccurate personal information that we have collected about you.
- **Right to Delete.** Subject to certain conditions and exceptions set forth in the applicable U.S. state privacy laws, you have the right to request that we delete the personal information we have collected about you.
- **Rights Regarding Sensitive Data.** We only process sensitive data with your consent or where otherwise permitted by applicable law. Where you have provided consent to this processing, you

may revoke your consent or opt out of the processing of your sensitive data at any time. For residents of California, this includes your CCPA right to limit the processing of sensitive personal information to that processing permitted by the CCPA.

- **Right to Opt-Out.** Residents of certain states have the right to direct us to stop selling, and for residents of California, sharing, your personal information to third parties and to refrain from doing so in the future. Residents of certain states also have the right to opt out of targeted advertising and profiling based on your personal information.
- **Right to Non-Discrimination.** You have the right not to be discriminated against for exercising any of your rights under any applicable U.S. state privacy laws.
- **Right to Appeal.** To the extent the applicable U.S. state privacy laws provide such rights, you may appeal our denial to act on your consumer rights under the applicable state privacy laws within a reasonable time. We will respond within designated period for responding to U.S. data subject requests and may exercise the right to extend this response period (to the extent authorized by applicable state privacy laws).

How to Exercise Your Rights. You may submit a request to exercise one of the above rights by calling (410) 246-3440 or emailing privacy@wrallp.com.

In your request, please specify the right you wish to exercise and provide enough information to help us verify your identity and locate your records. If you are an applicant with a Careers Site account, you may also submit certain requests through that account. We may request additional information solely to verify your identity and protect privacy and security. If we deny your request (for example, where we must retain certain records for legal, security, or equal employment opportunity obligations), we will provide a reason where required by law.

Authorized Agents. Where permitted by law, you may designate an authorized agent to submit a request on your behalf; we may require proof of authorization and your identity. If we deny your request, you may appeal by calling (410) 246-3440 or emailing privacy@wrallp.com and indicating “Privacy Request Appeal” in the subject line.

Non-Discrimination. We will not discriminate against you for exercising your privacy rights.

Excessive Requests. If requests from a consumer are manifestly unfounded or excessive, in particular because of their repetitive character, we may either (1) charge a reasonable fee, or (2) refuse to act on the request and notify the consumer of the reason for refusing the request. If we charge a fee, the amount will be based upon the administrative costs of providing the information or communication or taking the action requested.

Opt-Out Preference Signals/Universal Opt-Out Mechanism. In the employment and applicant context, we do not sell or share your personal information for targeted advertising. If our cookie practices change to constitute a “sale” or “sharing” under California law in a non-employment context, we will provide a “Do Not Sell or Share My Personal Information” link and honor opt-out preference signals (such as Global Privacy Control) consistent with applicable law.

11.0 California Residents

All terms used in this section shall have the meanings given in the California Consumer Privacy Act (“CCPA”), where applicable.

CCPA Notice at Collection

We collect and process personal information as described in the above Information We May Collect & How We May Use Information section of this Policy. The relevant CCPA categories for this information are indicated below. We may provide a separate notice at collection if we collect additional information or intend to use information for additional purposes.

Category	CCPA Categories
Contact Information	For purposes of the CCPA, Contact Information includes the following categories of personal information: Identifiers Categories Described in the Customer Records Statute Professional or Employment-related Information
Communications and Inquiries	For purposes of the CCPA, Communications and Inquiries include the following categories of personal information: Identifiers Categories Described in the Customer Records Statute Commercial Information Professional or Employment-Related Information
Application Information	For purposes of the CCPA, Application Information includes the following categories of personal information: Identifiers Categories Described in the Customer Records Statute Professional or Employment-related Information Commercial Information Sensitive Information
Cookies and Similar Technologies	For purposes of the CCPA, Cookies and Similar Technologies include the following categories of personal information: Identifiers Internet or Other Electronic Network Activity Information Geolocation Data
Device and Usage Information	For purposes of the CCPA, Device and Usage Information include the following categories of personal information: Identifiers Internet or Other Electronic Network Activity Information Geolocation Data

Data Practices During the Last 12 Months

The disclosures below describe our data practices during the last twelve months.

Personal Information Collected: We may have collected the following categories of personal information during the preceding 12 months:

- Identifiers
- Categories of Personal Information Described in the California Customer Records Statute
- Characteristics of Protected Classifications
- Commercial Information
- Internet or Other Electronic Network Activity Information
- Professional or Employment-Related Information
- Education Information
- Geolocation Data
- Audio, Electronic, Visual, Thermal, or Similar Information
- Sensitive Personal Information

Categories of Sources: We have collected personal information from you and through third parties, including public sources. If you are a job applicant or an employee, this also includes background check providers.

Business and Commercial Purposes for Collecting: We have collected the categories of personal information listed above for the following purposes:

Generally:

- to operate our Site and business;
- to provide our products and services to you;
- to provide customer support;
- to ensure the privacy and security of our Site, products, and services;

- to administer promotions, surveys, and other customer engagement features;
- to maintain our databases and back-ups;
- to manage our relationships with you;
- to serve you the content and functionality you request;
- to enhance your experience and provide you with a more personal and interactive experience;
- to communicate with you;
- to keep records of our communications with you;
- to determine user interests;
- for usage analytics purposes;
- to process and complete payments and other transactions;
- to detect fraud and prevent loss;
- for recruitment or human resources purposes;
- to carry out our obligations under employment law, for the performance of the employment relationship, or as permitted by applicable law;
- to comply with legal or regulatory obligations applicable to the processing and retention of payment data;
- to improve products and services; and
- for purposes that are consistent with, related to and/or ancillary to the purposes and uses described in this Policy for which your personal information was provided to us.

Job applicants:

- to communicate with you;
- to process your application with us;
- to assess and document your qualifications for the requirements of the role for which you applied;
- for background screening and vetting;
- to confirm your identity and your entitlement to work in the applicable country;
- to carry out our obligations under applicable law;
- for personnel and human resources management;
- for operations management;
- for security management;
- for legal and regulatory compliance;
- for the creation of anonymous/de-identified data; and
- for purposes that are consistent with, related to, and/or ancillary to the purposes and uses described

Personal Information Sold or Shared. We have not sold or shared categories of personal information during the preceding 12 months.

Personal Information Disclosed for a Business Purpose. We have disclosed for a business purpose the categories of personal information listed below during the preceding 12 months. We have disclosed each category of personal information to the following categories of third parties: (1) affiliates; (2) advisors (e.g., accountants, attorneys); (3) service providers (e.g., data analytics, data storage, mailing, payment processing, administration, technical support); and (4) as required by law, to government agencies, law enforcement, and regulatory authorities.

- Identifiers
- Categories Described in the Customer Records Statute
- Characteristics of Protected Classifications
- Commercial Information
- Internet or Other Electronic Network Activity Information
- Geolocation Data
- Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information
- Professional or Employment-related Information
- Education Information
- Sensitive Personal Information

No Financial Incentives. We do not offer financial incentives or any price or service difference in exchange for the retention or sale of your personal information.

Notice of Right to Opt-out of Sale/Sharing. As a California resident, you have the right to direct us to stop selling or sharing your personal information to third parties and to refrain from doing so in the future. For purposes of the CCPA, we do not currently sell or share personal information as defined under applicable law. Should our practices change, we will update this Policy and provide appropriate notice and opt-out mechanisms as required by law.

Limited Use of Sensitive Personal Information. We only use or disclose sensitive personal information for purposes permitted by the CCPA and to which the right to limit does not apply.

Non-Discrimination. You have the right not to receive discriminatory treatment by us due to your exercise of the rights provided by the CCPA. We do not offer financial incentives and price or service differences.

12.0 Third-Party Sites

The Site and Careers Site may link to third-party websites, services, or content that WRA does not control. This Policy does not apply to those third parties. The inclusion of a link on the Site or Careers Site does not imply endorsement of the linked site or service by us. We are not responsible for the privacy practices or content of third-party sites. We encourage you to review each third-party site's terms and privacy policies before providing any personal information.

13.0 Children's Privacy

The Site is not directed to anyone under the age of 18, and we do not knowingly collect personal information from children under 18. No one under the age of 18 may access, browse, or use the Sites, or provide any information to us. If we learn we have collected personal information from a child under 18, we will delete it in accordance with applicable law. The Careers Site is intended for individuals 18 or older. If you are a parent or guardian and believe we have collected information from a child under 18, please contact us immediately using the contact information provided in this Policy.

14.0 Law Applicable to Job Application

The Careers Site is operated from Maryland. Accordingly, any personal information you submit to the Careers Site will be collected in Maryland and will be subject to Maryland and applicable federal laws. The Careers Site is not intended for distribution to, or use by, any person or entity in any jurisdiction or country where such distribution or use would be contrary to local law or regulation.

15.0 Updates and Changes to this Policy

We may update our Privacy Policy periodically. If we make material changes to how we treat our users' personal information, we will post the new policy/terms on this page and update the date the Privacy Policy was last modified, as is identified at the top of the page. You are responsible for periodically visiting this page to check for any updates.

16.0 Contact Us

For more information, or if you have any questions or concerns regarding this Privacy Policy, or to exercise any of your privacy rights as described in this Policy, you may contact us using the information below, and we will respond to your inquiry in accordance with applicable law. Please note, if your communication is sensitive, you may wish to contact us by postal mail.

In Writing: Whitman, Requardt and Associates, LLP
801 South Caroline St.
Baltimore, MD 21231

By Email: privacy@wrallp.com

