

India Privacy Notice

Last Updated 9/8/2025

Privacy Policy

Introduction

“Citrin Cooperman” is the brand under which Citrin Cooperman & Company, LLP, a licensed independent CPA firm, and Citrin Cooperman Advisors LLC serve clients’ business needs. The two firms operate as separate legal entities in an alternative practice structure. Citrin Cooperman is an independent member of Moore North America, which is itself a regional member of Moore Global Network Limited (MGNL).

This Privacy Notice describes how Citrin Cooperman and more specifically Citrin Cooperman India LLP, collects, uses, shares, sells, discloses, retains, disposes of, and protects Personal Data when you interact with us as a job applicant, employee, contractor, event attendee, office visitor, third party (Data Fiduciary/Data Processor), or any other relevant individual, and describes the choices you have relating to your Personal Data and how to exercise such rights.

Applicability

This Privacy Notice applies to any Personal Data you provide to Citrin Cooperman and any Personal Data we collect during your employment, when you apply to a job posting, contact us, visit, or use our website, “www.citrincooperman.com” and all websites linked to this website, when you visit a Citrin Cooperman office, attend a Citrin Cooperman event or seminar. To use this site, you do not need to send us any Personal Data.

For purposes of this Privacy Notice, “Personal Data,” means any data about an individual who is identifiable by or in relation to such data as defined in, and governed by The Digital Personal Data Protection Act, 2023.

At Citrin Cooperman, we value your privacy and are committed to safeguarding your Personal Data as part of our ongoing dedication to providing a secure and transparent experience for our users. As a result, we are committed to keeping our Privacy Notice up to date, reflecting any changes in our Personal Data practices or the adoption of new privacy policies. Should you have any questions or concerns about our Privacy Notice or how we process your Personal Data, please do not hesitate to reach out to us.

Your Personal Data

We collect and use your Personal Data when you apply for a job to assess your suitability for job opportunities and provide you with personalized experiences. Additionally, we collect and use your Personal Data as an employee to manage the employment relationship including the distribution of benefits, communicate with you, improve the workplace, and protect the health and safety of our employees, and comply with legal and regulatory requirements.

We process your Personal Data for the following purposes:

- To comply with legal/regulatory requirements
- To operate and improve our business
- To manage our workforce and provide them with employment, training, compensation, or benefits
- To improve the security and performance of our website, network, systems, and services
- To protect against fraud and abuse
- To protect the safety and security of our employees and clients
- To operate and understand your use of our website

Type of Personal Data We Collect

We may collect and process the following types of Personal Data:

Data Category (Contractors)	Example Personal Identifiers	Purposes for Collection/Use
Authenticating Information	Passwords, PIN, mother's maiden name	<p>We collect and process your Authenticating Information for the following purposes:</p> <ul style="list-style-type: none"> • To authenticate your identity and grant you access to our services or systems. • To prevent fraud and abuse. • To comply with legal requirements, such as those related to financial services or healthcare. • To improve the security of our systems and services.
Beneficiary Contact Information	Name of beneficiary contact, telephone number of beneficiary contact, address of beneficiary contact, relationship to individual	<p>We collect and process your Beneficiary Contact Information for the following purposes:</p> <ul style="list-style-type: none"> • To contact your beneficiary in the event of your death. • To provide information about benefits to your beneficiary. • To comply with legal requirements, such as those related to employment law or tax law. • To protect the privacy of your beneficiary contact information.
Background Check Information	Criminal history, criminal records, driving citations	<p>We collect and process your Background Check Information for the following purposes:</p> <ul style="list-style-type: none"> • To prevent fraud and abuse.
Contact Information	Name, postal address, phone number, mailing address, email address, physical location	<p>We collect and process your Contact Information for the following purposes:</p> <ul style="list-style-type: none"> • To verify your identity. • To communicate with you about our products and services. • To contact you about your account. • To improve our security. • To improve our events. • To invite you to our events or webinars. • To fulfill our contractual obligations to you. • To provide you with customer support. • To comply with legal requirements. • To prevent fraud and abuse. • To improve our products and services.
Device Information	Device type and operating system, device unique identifier, IP address, audio, video, device fingerprints	<p>We collect and process your Device Information for the following purposes:</p> <ul style="list-style-type: none"> • To provide you with our products and services. • To protect our systems and networks. • To protect our users. • To comply with legal requirements.
Emergency Contact Information	Name of emergency contact, contact information of emergency contact, relationship to individual, next of kin	<p>We collect and process your Emergency Contact Information to contact your emergency contact in an emergency.</p>
Family Information	Parent's name, dependents, and other household information	<p>We collect and process your Family Information for the following purposes:</p> <ul style="list-style-type: none"> • To contact your family members in the event of an emergency.

Financial Detail Information	Bank account information, bank statements, compensation data, and other financial-related details such as income, investments, benefits, tax status	<p>We collect and process your Financial Detail Information for the following purposes:</p> <ul style="list-style-type: none"> • To process payments. • To verify your identity. • To protect our interests. • To provide you with the financial products and services that you have requested. • To comply with legal requirements. • To protect against fraud and abuse.
Government Identifier Information	Driver's license, national identification number, passport number, social security number, national identity card details	<p>We collect and process your Government Identifier Information for the following purposes:</p> <ul style="list-style-type: none"> • To verify your identity. • To comply with legal requirements. • To prevent fraud and abuse.
Personal Detail Information	Age, gender, date of birth, marital status, nationality, signature	<p>We collect and process your Personal Detail Information for the following purposes:</p> <ul style="list-style-type: none"> • To provide information that you have requested. • To provide event registration. • To improve our products and services. • To improve our events. • To comply with legal requirements. • To prevent fraud and abuse.
Personal Health Information	Information related to medical payment, medical claims data, medical history, products, or equipment used, health plan beneficiary, medical treatment	<p>We collect and process your Personal Health Information for the following purposes:</p> <ul style="list-style-type: none"> • To assist in meal planning.
Professional Experience and Affiliation Information	Professional memberships, qualifications, certifications	<p>We collect and process your Professional Experience and Affiliation Information for the following purposes:</p> <ul style="list-style-type: none"> • To evaluate your qualifications for employment. • To comply with legal requirements. • To prevent fraud and abuse.
Referral Information	Name of referral, contact information of referral, relationship of referral	<p>We collect and process your Referral Information for the following purposes:</p> <ul style="list-style-type: none"> • To evaluate your qualifications for employment. • To contact you about employment opportunities. • To improve our hiring process. • To comply with legal requirements. • To prevent fraud and abuse.
Special Categories of Personal Data	Genetic, biometric and health data, as well as Personal Data revealing racial and ethnic origin, political opinions, religious or ideological convictions or trade union membership.	<p>We collect and process your Special Categories of Personal Data for the following purposes:</p> <ul style="list-style-type: none"> • To comply with legal requirements such as anti-discrimination laws. • To protect the safety of employees or others. • To conduct research on the effectiveness of training programs or the impact of diversity in the workplace. • To prevent fraud and abuse.
Travel and Expense Information	Expense details, travel booking details, travel history	<p>We collect and process your Travel and Expense Information for the following purposes:</p> <ul style="list-style-type: none"> • To reimburse your travel expenses. • To track your travel expenses. • To ensure you are complying with company travel policies.

		<ul style="list-style-type: none"> • To improve our travel and expense management processes. • To comply with legal requirements.
Workplace Welfare Information	Bullying and harassment details	<p>We collect and process your Workplace Welfare Information for the following purposes:</p> <ul style="list-style-type: none"> • To improve our workplace welfare programs. • To comply with legal requirements. • To prevent fraud and abuse.

Data Category (Employees)	Example Personal Identifiers	Purposes for Collection/Use
Authenticating Information	Passwords, PIN, mother's maiden name	<p>We collect and process your Authenticating Information for the following purposes:</p> <ul style="list-style-type: none"> • To authenticate your identity and grant you access to our services or systems. • To prevent fraud and abuse. • To comply with legal requirements, such as those related to financial services or healthcare. • To improve the security of our systems and services.
Beneficiary Contact Information	Name of beneficiary contact, telephone number of beneficiary contact, address of beneficiary contact, relationship to individual	<p>We collect and process Beneficiary Contact Information of clients and employees for the following purposes:</p> <ul style="list-style-type: none"> • To contact your beneficiary in the event of your death. • To provide information about benefits to your beneficiary. • To comply with legal requirements, such as those related to employment law or tax law. • To protect the privacy of your beneficiary contact information.
Background Check Information	Criminal history, criminal records, driving citations	<p>We collect and process your Background Check Information for the following purposes:</p> <ul style="list-style-type: none"> • To prevent fraud and abuse. • To verify your identity and qualifications. • To assess your suitability for the position. • To comply with legal requirements, such as those related to employment law or anti-discrimination law. • To protect the safety and security of our employees and customers. • To prevent fraud and abuse. • To improve our decision-making about hiring, promotion, and other employment-related decisions.
Children Information	Names of children, age or gender of children, birth date, address of children, activities associated with children	<p>We collect and process Clients' Children Information only with the consent of a parent or guardian for the following purposes:</p> <ul style="list-style-type: none"> • To comply with our legal obligation to protect the privacy of children. • To provide employees with benefits. • To provide employees with services.
Contact Information	Name, postal address, phone number, mailing address, email address, physical location	<p>We collect and process your Contact Information for the following purposes:</p> <ul style="list-style-type: none"> • To verify your identity. • To communicate with you about our products and services.

		<ul style="list-style-type: none"> • To contact you about your account. • To improve our security. • To improve our events. • To invite you to our events or webinars. • To fulfill our contractual obligations to you. • To provide you with customer support. • To comply with legal requirements. • To prevent fraud and abuse. • To improve our products and services.
Device Information	Device type and operating system, device unique identifier, IP address, audio, video, device fingerprints	<p>We collect and process your Device Information for the following purposes:</p> <ul style="list-style-type: none"> • To provide you with our products and services. • To protect our systems and networks. • To protect our users. • To comply with legal requirements.
Education and Skills Information	Academic transcripts, educational degrees, education training and history, languages, letters of recommendation	<p>We collect and process your Education and Skills Information for the following purposes:</p> <ul style="list-style-type: none"> • To assess the potential advancement of employees. • To provide training and development opportunities for employees. • To improve the company's recruitment and hiring processes.
Employment Information	Benefits and entitlements data, company/entity, contract type, hours of work, job title, salary/wage, workers compensation claims, start date, end date, reason for termination, employee performance results, record of absence, time tracking, annual leave, office location, previous work history, grievances and complaints, health and safety-related information and reporting, job application details, disciplinary action, exit interview	<p>We collect and process your Employment Information for the following purposes:</p> <ul style="list-style-type: none"> • To assess the potential advancement of employees. • To provide training and development opportunities for employees. • To manage our workforce. • To comply with legal requirements. • To provide you with the benefits and services to which you are entitled.
Emergency Contact Information	Name of emergency contact, contact information of emergency contact, relationship to individual, next of kin	We collect and process your Emergency Contact Information to contact your emergency contact in an emergency.
Family Information	Parent's name, dependents, and other household information	<p>We collect and process your Family Information for the following purposes:</p> <ul style="list-style-type: none"> • To contact your family members in the event of an emergency.
Financial Detail Information	Bank account information, bank statements, compensation data, and other financial-related details such as income, investments, benefits, tax status	<p>We collect and process your Financial Detail Information for the following purposes:</p> <ul style="list-style-type: none"> • To process payroll. • To verify your identity. • To conduct due diligence. • To protect our interests. • To provide you with the financial products and services that you have requested. • To comply with legal requirements.

		<ul style="list-style-type: none"> • To protect against fraud and abuse.
Government Identifier Information	Driver's license, national identification number, passport number, social security number, national identity card details	<p>We collect and process your Government Identifier Information for the following purposes:</p> <ul style="list-style-type: none"> • To verify your identity. • To comply with legal requirements. • To prevent fraud and abuse. • To provide government-mandated benefits.
Personal Detail Information	Age, gender, date of birth, marital status, nationality, signature	<p>We collect and process your Personal Detail Information for the following purposes:</p> <ul style="list-style-type: none"> • To provide employment. • To provide benefits. • To provide information that you have requested. • To provide event registration. • To improve our products and services. • To improve our employment practices. • To improve our benefits. • To provide you with benefits. • To improve our events. • To comply with legal requirements. • To prevent fraud and abuse. • To market employment opportunities. • To market our benefits to you.
Personal Health Information	Information related to medical payment, medical claims data, medical history, products, or equipment used, health plan beneficiary, medical treatment	<p>We collect and process your Personal Health Information for the following purposes:</p> <ul style="list-style-type: none"> • To assist in meal planning. • To improve our products and services. • To improve our benefits. • To provide you with benefits. • To communicate with healthcare providers. • To comply with regulatory requirements. • To prevent fraud and abuse.
Special Categories of Personal Data	Genetic, biometric and health data, as well as Personal Data revealing racial and ethnic origin, political opinions, religious or ideological convictions or trade union membership.	<p>We collect and process your Special Categories of Personal Data for the following purposes:</p> <ul style="list-style-type: none"> • To comply with legal requirements such as anti-discrimination laws. • To protect the safety of employees or others. • To conduct research on the effectiveness of training programs or the impact of diversity in the workplace. • To prevent fraud and abuse. • To improve our benefits. • To provide you with benefits. • To communicate with healthcare providers.
Travel and Expense Information	Expense details, travel booking details, travel history	<p>We collect and process your Travel and Expense Information for the following purposes:</p> <ul style="list-style-type: none"> • To reimburse your travel expenses. • To track your travel expenses. • To ensure you are complying with company travel policies. • To improve our travel and expense management processes. • To comply with legal requirements.

User Account Information	Account age, account number, email address or username, account password	<p>We collect and process your User Account Information for the following purposes:</p> <ul style="list-style-type: none"> • To create and manage your account. • To provide you with access to our products and services. • To protect your account from unauthorized access. • To improve our products and services. • To comply with legal requirements.
Workplace Welfare Information	Bullying and harassment details	<p>We collect and process your Workplace Welfare Information for the following purposes:</p> <ul style="list-style-type: none"> • To provide you with the benefits to which you are entitled. • To manage your compensation and benefits. • To improve our workplace welfare programs. • To comply with legal requirements. • To prevent fraud and abuse.

Data Category (Event Attendees)	Example Personal Identifiers	Purposes for Collection/Use
Contact Information	Name, postal address, phone number, mailing address, email address, physical location	<p>We collect and process your Contact Information for the following purposes:</p> <ul style="list-style-type: none"> • To market our products and services. • To send you marketing materials. • To verify your identity. • To identify potential clients. • To communicate with you about our products and services. • To contact you about your account. • To improve our security. • To improve our events. • To invite you to our events or webinars. • To fulfill our contractual obligations to you. • To provide you with customer support. • To comply with legal requirements. • To prevent fraud and abuse. • To improve our products and services.
Device Information	Device type and operating system, device unique identifier, IP address, audio, video, device fingerprints	<p>We collect and process your Device Information for the following purposes:</p> <ul style="list-style-type: none"> • To provide you with our products and services. • To protect our systems and networks. • To protect our users. • To comply with legal requirements.
Emergency Contact Information	Name of emergency contact, contact information of emergency contact, relationship to individual, next of kin	We collect and process your Emergency Contact Information to contact your emergency contact in an emergency.
Family Information	Parent's name, dependents, and other household information	<p>We collect and process your Family Information for the following purposes:</p> <ul style="list-style-type: none"> • To contact your family members in the event of an emergency.

Government Identifier Information	Driver's license, national identification number, passport number, social security number, national identity card details	We collect and process your Government Identifier Information for the following purposes: <ul style="list-style-type: none"> To verify your identity. To comply with legal requirements. To prevent fraud and abuse.
Personal Detail Information	Age, gender, date of birth, marital status, nationality, signature	We collect and process your Personal Detail Information for the following purposes: <ul style="list-style-type: none"> To provide products and services that you have requested. To provide information that you have requested. To provide event registration. To improve our products and services. To improve our events. To comply with legal requirements. To prevent fraud and abuse. To market our products and services.
Personal Health Information	Information related to medical payment, medical claims data, medical history, products, or equipment used, health plan beneficiary, medical treatment	We collect and process your Personal Health Information for the following purposes: <ul style="list-style-type: none"> To assist in meal planning.
Professional Experience and Affiliation Information	Professional memberships, qualifications, certifications	We collect and process your Professional Experience and Affiliation Information for the following purposes: <ul style="list-style-type: none"> To evaluate your qualifications for employment. To comply with legal requirements. To prevent fraud and abuse.
Social Media Information	Social media accounts, social media content, social media history, profile information, posts, connections, likes, shares, comments, interactions, behavioral data, technical data	We collect and process your Social Media Information for the following purposes: <ul style="list-style-type: none"> To market our products and services to you. To improve our products and services. To comply with legal requirements.

Data Category (Job Applicants)	Example Personal Identifiers	Purposes for Collection/Use
Background Check Information	Criminal history, criminal records, driving citations	We collect and process your Background Check Information for the following purposes: <ul style="list-style-type: none"> To understand your needs and interests. To verify your identity and qualifications. To assess your suitability for the position. To comply with legal requirements, such as those related to employment law or anti-discrimination law. To protect the safety and security of our employees and customers. To prevent fraud and abuse. To improve our decision-making about hiring, promotion, and other employment-related decisions.
Contact Information	Name, postal address, phone number, mailing address, email address, physical location	We collect and process your Contact Information for the following purposes: <ul style="list-style-type: none"> To verify your identity. To communicate with you about our products and services.

		<ul style="list-style-type: none"> • To improve our security. • To improve our events. • To invite you to our events or webinars. • To fulfill our contractual obligations to you. • To provide you with customer support. • To comply with legal requirements. • To prevent fraud and abuse. • To improve our products and services.
Device Information	Device type and operating system, device unique identifier, IP address, audio, video, device fingerprints	<p>We collect and process your Education and Skills Information for the following purposes:</p> <ul style="list-style-type: none"> • To provide you with our products and services. • To protect our systems and networks. • To protect our users. • To comply with legal requirements.
Education and Skills Information	Academic transcripts, educational degrees, education training and history, languages, letters of recommendation	<p>We collect and process your Education and Skills Information for the following purposes:</p> <ul style="list-style-type: none"> • To verify the educational qualifications of job applicants. • To improve the company's recruitment and hiring processes.
Employment Information	Benefits and entitlements data, company/entity, contract type, hours of work, job title, salary/wage, workers compensation claims, start date, end date, reason for termination, employee performance results, record of absence, time tracking, annual leave, office location, previous work history, grievances and complaints, health and safety-related information and reporting, job application details, disciplinary action, exit interview	<p>We collect and process your Employment Information for the following purposes:</p> <ul style="list-style-type: none"> • To verify the educational qualifications of job applicants. • To provide training and development opportunities for employees. • To improve the company's recruitment and hiring processes. • To comply with legal requirements.
Emergency Contact Information	Name of emergency contact, contact information of emergency contact, relationship to individual, next of kin	We collect and process your Emergency Contact Information to contact your emergency contact in an emergency.
Government Identifier Information	Driver's license, national identification number, passport number, social security number, national identity card details	<p>We collect and process your Government Identifier Information for the following purposes:</p> <ul style="list-style-type: none"> • To verify your identity. • To comply with legal requirements. • To prevent fraud and abuse.
Personal Detail Information	Age, gender, date of birth, marital status, nationality, signature	<p>We collect and process your Personal Detail Information for the following purposes:</p> <ul style="list-style-type: none"> • To provide employment. • To provide information that you have requested. • To provide event registration. • To improve our products and services. • To improve our events. • To comply with legal requirements. • To prevent fraud and abuse. • To market employment opportunities.

		<ul style="list-style-type: none"> To market our benefits to you.
Personal Health Information	Information related to medical payment, medical claims data, medical history, products, or equipment used, health plan beneficiary, medical treatment	<p>We collect and process your Personal Health Information for the following purposes:</p> <ul style="list-style-type: none"> To assist in meal planning.
Professional Experience and Affiliation Information	Professional memberships, qualifications, certifications	<p>We collect and process your Professional Experience and Affiliation Information for the following purposes:</p> <ul style="list-style-type: none"> To evaluate your qualifications for employment. To improve our products and services. To comply with legal requirements. To prevent fraud and abuse.
Referral Information	Name of referral, contact information of referral, relationship of referral	<p>We collect and process your Referral Information for the following purposes:</p> <ul style="list-style-type: none"> To evaluate your qualifications for employment. To contact you about employment opportunities. To improve our hiring process. To comply with legal requirements. To prevent fraud and abuse.
Special Categories of Personal Data	Genetic, biometric and health data, as well as Personal Data revealing racial and ethnic origin, political opinions, religious or ideological convictions or trade union membership.	<p>We collect and process your Special Categories of Personal Data for the following purposes:</p> <ul style="list-style-type: none"> To improve our products and services. To comply with legal requirements such as anti-discrimination laws. To protect the safety of employees or others. To conduct research on the effectiveness of training programs or the impact of diversity in the workplace. To prevent fraud and abuse.

Data Category (Office Visitors)	Example Personal Identifiers	Purposes for Collection/Use
Contact Information	Name, postal address, phone number, mailing address, email address, physical location	<p>We collect and process your Contact Information for the following purposes:</p> <ul style="list-style-type: none"> To market our products and services. To send you marketing materials. To verify your identity. To identify potential clients. To communicate with you about our products and services. To contact you about your office visit. To improve our security. To improve our events. To invite you to our events or webinars. To fulfill our contractual obligations to you. To provide you with customer support. To comply with legal requirements. To prevent fraud and abuse. To improve our products and services.
Device Information	Device type and operating system, device unique identifier, IP address, audio, video, device fingerprints	<p>We collect and process your Device Information for the following purposes:</p> <ul style="list-style-type: none"> To provide you with our products and services. To protect our systems and networks.

		<ul style="list-style-type: none"> • To protect our users. • To comply with legal requirements.
Emergency Contact Information	Name of emergency contact, contact information of emergency contact, relationship to individual, next of kin	We collect and process your Emergency Contact Information to contact your emergency contact in an emergency.
Government Identifier Information	Driver's license, national identification number, passport number, social security number, national identity card details	We collect and process your Government Identifier Information for the following purposes: <ul style="list-style-type: none"> • To verify your identity. • To comply with legal requirements. • To prevent fraud and abuse.
Personal Detail Information	Age, gender, date of birth, marital status, nationality, signature	We collect and process your Personal Detail Information for the following purposes: <ul style="list-style-type: none"> • To provide products and services that you have requested. • To provide information that you have requested. • To provide event registration. • To improve our products and services. • To improve our events. • To comply with legal requirements. • To prevent fraud and abuse.
Personal Health Information	Information related to medical payment, medical claims data, medical history, products, or equipment used, health plan beneficiary, medical treatment	We collect and process your Personal Health Information for the following purposes: <ul style="list-style-type: none"> • To assist in meal planning.

Data Category (Third Parties)	Example Personal Identifiers	Purposes for Collection/Use
Contact Information	Name, postal address, phone number, mailing address, email address, physical location	We collect and process your Contact Information for the following purposes: <ul style="list-style-type: none"> • To verify your identity. • To communicate with you about our products and services. • To improve our security. • To improve our events. • To invite you to our events or webinars. • To fulfill our contractual obligations to you. • To comply with legal requirements. • To prevent fraud and abuse. • To improve our products and services.
Device Information	Device type and operating system, device unique identifier, IP address, audio, video, device fingerprints	We collect and process your Device Information for the following purposes: <ul style="list-style-type: none"> • To provide you with our products and services. • To protect our systems and networks. • To protect our users. • To comply with legal requirements.
Emergency Contact Information	Name of emergency contact, contact information of emergency contact, relationship to individual, next of kin	We collect and process your Emergency Contact Information to contact your emergency contact in an emergency.

Financial Detail Information	Bank account information, bank statements, compensation data, and other financial-related details such as income, investments, benefits, tax status	<p>We collect and process your Financial Detail Information for the following purposes:</p> <ul style="list-style-type: none"> • To process payroll. • To verify your identity. • To conduct due diligence. • To protect our interests. • To negotiate acquisitions. • To comply with legal requirements. • To protect against fraud and abuse.
Government Identifier Information	Driver's license, national identification number, passport number, social security number, national identity card details	<p>We collect and process your Government Identifier Information for the following purposes:</p> <ul style="list-style-type: none"> • To verify your identity. • To comply with legal requirements. • To prevent fraud and abuse.
Personal Detail Information	Age, gender, date of birth, marital status, nationality, signature	<p>We collect and process your Personal Detail Information for the following purposes:</p> <ul style="list-style-type: none"> • To provide information that you have requested. • To provide event registration. • To improve our products and services. • To improve our events. • To comply with legal requirements. • To prevent fraud and abuse.
Personal Health Information	Information related to medical payment, medical claims data, medical history, products, or equipment used, health plan beneficiary, medical treatment	<p>We collect and process your Personal Health Information for the following purposes:</p> <ul style="list-style-type: none"> • To assist in meal planning.
Referral Information	Name of referral, contact information of referral, relationship of referral	<p>We collect and process your Referral Information for the following purposes:</p> <ul style="list-style-type: none"> • To evaluate your qualifications for employment. • To contact you about employment opportunities. • To improve our hiring process. • To comply with legal requirements. • To prevent fraud and abuse.
Special Categories of Personal Data	Genetic, biometric and health data, as well as Personal Data revealing racial and ethnic origin, political opinions, religious or ideological convictions or trade union membership.	<p>We collect and process your Special Categories of Personal Data for the following purposes:</p> <ul style="list-style-type: none"> • To comply with legal requirements such as anti-discrimination laws. • To protect the safety of employees or others. • To conduct research on the effectiveness of training programs or the impact of diversity in the workplace.
Workplace Welfare Information	Bullying and harassment details	<p>We collect and process your Workplace Welfare Information for the following purposes:</p> <ul style="list-style-type: none"> • To improve our workplace welfare programs. • To comply with legal requirements. • To prevent fraud and abuse.

Data Category (Website Users)	Example Personal Identifiers	Purposes for Collection/Use
-------------------------------	------------------------------	-----------------------------

Browsing Information	Browsing time, cookie information, IP address, web beacons, device fingerprinting, imprecise geolocation information, web browsing history, search history, clickstream data, social media activity, ad tracking data, pixels, device unique identifier, browser type and settings, application usage data	<p>We collect and process your Browsing Information for the following purposes:</p> <ul style="list-style-type: none"> • To understand your interests and needs. • To improve the performance of our marketing campaigns. • To improve the performance of our website. • To personalize the content and advertising that we show to users. • To prevent fraud and abuse. • To comply with legal requirements. • To improve the security of our website, systems, and services.
Contact Information	Name, postal address, phone number, mailing address, email address, physical location	<p>We collect and process your Contact Information for the following purposes:</p> <ul style="list-style-type: none"> • To market our products and services. • To send you marketing materials. • To verify your identity. • To identify potential clients. • To communicate with you about our products and services. • To contact you about your account. • To improve our security. • To improve our events. • To invite you to our events or webinars. • To provide you with customer support. • To comply with legal requirements. • To prevent fraud and abuse. • To improve our products and services.
Device Information	Device type and operating system, device unique identifier, IP address, audio, video, device fingerprints	<p>We collect and process your Device Information for the following purposes:</p> <ul style="list-style-type: none"> • To provide you with our products and services. • To improve our products and services that you have requested. • To protect our systems and networks. • To protect our users. • To comply with legal requirements. • To market our products and services to you.
Social Media Information	Social media accounts, social media content, social media history, profile information, posts, connections, likes, shares, comments, interactions, behavioral data, technical data	<p>We collect and process your Social Media Information for the following purposes:</p> <ul style="list-style-type: none"> • To understand your interests and preferences. • To personalize your experience. • To market our products and services to you. • To improve our products and services. • To comply with legal requirements.

Categories of Data Fiduciaries and/or Data Processors to Whom Personal Data Is Potentially Disclosed

We may need to disclose your Personal Data in certain circumstances as outlined below to carry out our business. We take your privacy seriously and will only disclose your Personal Data when it is necessary to do so. Furthermore, we have put safeguards in place to protect your Personal Data and will only disclose your Personal Data to Data Fiduciaries and/or Data Processors who have agreed to protect it as well.

- Citrin Cooperman: Citrin Cooperman may disclose Personal Data from its original location in India to the United States, our Corporate Headquarters, for processing activities, such as for payroll management, employee benefits administration, and personnel record-keeping.
- Third-party suppliers, service providers, affiliates, and business partners: Citrin Cooperman may disclose Personal Data to third-party suppliers, service providers, affiliates, and business partners to assist us in meeting business operation needs and to deliver our services and functions.
- Vendors: Citrin Cooperman may disclose Personal Data to vendors who provide services to the firm, such as information technology services, cloud computing services, and data storage services. This is done to allow these vendors to perform their services effectively and efficiently.
- Investors: Citrin Cooperman may disclose Personal Data to investors to provide them with information about the firm's financial performance and operations. This disclosure is necessary for investors to make informed investment decisions.
- Regulators: Citrin Cooperman may disclose Personal Data to regulators to comply with legal and regulatory requirements. For example, Citrin Cooperman may be required to disclose Personal Data to the Securities and Exchange Commission in connection with an audit of a public company.
- Law enforcement: Citrin Cooperman may disclose Personal Data to law enforcement agencies if required to do so by law. For example, Citrin Cooperman may be required to disclose Personal Data to the Federal Bureau of Investigation in connection with an investigation of a financial crime.

Mergers and Acquisitions

In the event Citrin Cooperman goes through a business transition, such as a merger, or the acquisition or sale of all or a portion of its assets, your Personal Data may be among the assets transferred.

How We Protect and Store Your Personal Data

Citrin Cooperman takes the protection of Personal Data very seriously and has in place several safeguards to protect the confidentiality and security of Personal Data. These technical and organizational measures include:

- System-level restrictions for access to programs and data, such as appropriate password safeguards and secure sign-on mechanisms, such as dual authentication, are in place.
- Restricted access to programs and data safeguards, such as user provisioning, deprovisioning, and recertification controls, are in place.
- Role-based access to programs and data safeguards, including Privileged User Access controls, are in place.
- Data minimization safeguards, including restricting access to Personal Data to authorized individuals, are in place.
- Data quality safeguards are in place to ensure the integrity of data, prevent errors, and improve the efficiency of data processing.
- Encryption safeguards are in place to protect data in transit and at rest.
- Logging and monitoring controls are in place to protect the integrity of Personal Data.

Citrin Cooperman also has several policies and procedures in place to govern the collection, use, share, sale, disclose, retention and disposal processing of Personal Data. These policies and procedures are designed to ensure that Personal Data is processed, collected, used, and disclosed in a lawfully, fair, and transparent manner. How long we retain your Personal Data depends on the purposes for which it was obtained and its nature. We will keep your

Personal Data for the period necessary to fulfill the purposes described in this Notice unless a longer retention period is permitted or required by law and in accordance with the Citrin Cooperman Record Retention Policy.

Retention

How long we retain your Personal Data depends on the purpose for which it was obtained and its nature. This includes complying with applicable legal requirements, including complying with the law, retaining records, resolving disputes, and enforcing our agreements. This storage retention period may extend beyond the term of your relationship with us. We will keep your Personal Data for the period necessary to fulfill the purposes described in this Notice unless a longer retention period is permitted or required by law and in accordance with the Citrin Cooperman Record Retention Policy.

Your Data Protection Rights

You may have certain rights over your Personal Data that enable you to control the use and processing of any of your Personal Data that we collect and use.

- Right to Know What Personal Data Is Being Collected/Right to Access Personal Data. You can ask us what Personal Data we collect about you and how we use it, upon verifiable request.
- Right to Recertification (Correction). You may have the right to request corrections of your Personal Data, upon verifiable request where it is inaccurate or out of date.
- Right to Be Forgotten (Right to Erasure). You may have the right under certain circumstances to have your Personal Data erased. You can request we delete Personal Data where you do not believe there is reason for us continuing to process it, or where you believe we collected or are using it unlawfully, where erasure is required by law or where you have withdrawn your consent, upon verifiable request. In certain cases, we may not be able to comply fully or at all with your correction request for legal reasons, and to the extent we are permitted to, we will notify you of the reasons.
- Right to Object to Direct Marketing. You have the right to object to the use of your Personal Data for direct marketing at any time. If you wish to modify your preferences in respect to marketing updates or notifications, or the mailing lists to which you subscribe, you can modify your preferences using this link. All commercial and marketing communications (e.g., notification emails and newsletters) include instructions for opting out of those communications.
- Right to Withdraw Consent. You have the right under certain circumstances, such as where we rely on your consent to process your Personal Data, to withdraw your consent. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, this may impact our ability to manage our employment relationship with you. We will advise you if this is the case when you withdraw your consent. In certain cases, such as for legal reasons, we may not be able to comply fully or at all with your request, and to the extent we are permitted to, we will notify you of the reasons.

Exercising Your Data Protection Rights

Only you, or someone you have legally nominated to act on your behalf, such as a registered Consent Manager, can make a verifiable consumer request related to your Personal Data. You, as a parent or lawful guardian, can also make a verifiable consumer request on behalf of your minor child. If you are making a request on behalf of someone else, we may ask for additional information to protect their Personal Data, such as proof that you are authorized to make the request. We will only use Personal Data provided in a verifiable request to verify the requestors' identity or authority to make the request.

We cannot respond to your request or provide you with your Personal Data if we cannot verify your identity or authority to make the request, or if we cannot confirm that the Personal Data relates to you or your minor child. We may also be unable to comply with your request if we have a legal or regulatory obligation to keep your Personal Data, such as when the Personal Data is necessary to fulfill our employment relationship with you or complete a transaction. Other reasons your request may be denied are if it jeopardizes the privacy of others.

Your request must:

- Provide enough information so that we can reasonably verify that you are the person whose Personal Data we collected or received from an authorized representative.
- Describe your request in enough detail so that we can understand, evaluate, and respond to it.

To the extent any of the above rights are applicable and you would like to exercise your rights, please leverage our [Data Subject Access Request Form](#), or contact us by email at privacy@citrincooperman.com, or by phone at (888) 450-2221.

How to Complain

If you have any concerns about our use of your Personal Data, you can make a complaint to us by email at privacy@citrincooperman.com, or by phone at (888) 450-2221.

Changes to This Notice

We may update this Statement occasionally. When we do, we will post the current version on this site, and we will revise the version date located at the top of this page. We encourage you to periodically review this Notice so that you will be aware of our privacy practices.

Accessible Format

This Privacy Notice is available to individuals with disabilities. To access this Privacy Notice in an alternative downloaded format, please [click here](#).