## **Privacy Policy**

12 November 2025

This Privacy Policy explains how Modern Assurance, LLC ("MOD," "we," "our," or "us") collects, uses, and protects personal information. It also describes the rights you have in relation to your personal data under applicable laws, including the General Data Protection Regulation (GDPR) and other global privacy frameworks.

#### Who We Are

Modern Assurance, LLC (MOD) provides audit, assurance, and related professional services. MOD is the controller of your personal data when you interact with us, visit our website, or engage our professional services. If you have questions about how we handle personal data, you can contact our data protection team at privacy@modassurance.com.

#### What Data We Collect

We collect personal data directly from you, for example, if you submit your contact details to receive marketing communications from us, or if you submit event-related data to attend an event hosted by MOD. We also obtain data from our clients and public sources in the context of providing professional services to your employer or service provider, for example, while conducting a server access review while conducting an examination of the company you work. In this policy, "personal data" means any information that identifies or can be used to identify an individual. This includes but not limited to names, contact details, identification numbers, job information, and digital identifiers. It may also include special categories of personal data revealing racial or ethnic origin, political opinions, religious beliefs, or health information, but only when permitted by law or when you provide it voluntarily.

# **Your Rights**

You have rights over your personal data, including the right to access, correct, delete, or restrict its use. You can also object to processing, withdraw consent where applicable, or request data portability. If you wish to exercise your rights, please contact privacy@modassurance.com. If you are concerned about an alleged breach of privacy law, you can contact your MOD contact, the MOD Managing Director. You also have the right to lodge a complaint with your local data protection authority.

#### **How We Use Your Data**

We use personal data for legitimate business purposes, including: providing professional services, managing client relationships, meeting legal and regulatory requirements, improving our website and services, and sending relevant communications. We do not intentionally collect sensitive category data, unless you provide it to us.

### **Legal Basis for Processing**

We process personal data only when we have a lawful basis to do so, such as: your consent, the performance of a contract, compliance with a legal obligation, or our legitimate business interests (for example, improving services or ensuring information security).

### **Data Sharing and Transfers**

We may share personal data with trusted third-party service providers who help us operate our business, including IT, accounting, communications, and compliance services. These providers are required to maintain appropriate data protection and confidentiality standards.

Because MOD works with international clients and partners, personal data may be transferred across borders, including outside the European Economic Area (EEA). We apply safeguards consistent with GDPR and other applicable laws to ensure your data remains protected.

# Security

We implement technical and organizational measures to protect your data against unauthorized access, disclosure, alteration, or loss. Access to personal data is limited to authorized personnel who have a legitimate business need.

### Keeping your personal data up to date

We maintain the accuracy and completeness of the personal data we hold. When you have changes to your contact details or other personal data, it is important that you inform us so that we have the most up-to-date information about you. Please contact the person you usually deal with at MOD. You can also contact privacy@modassurance.com.

#### **Data Retention**

We retain personal data only for as long as necessary to fulfill the purposes described in this policy, to meet legal or professional obligations, or as required by contract. When data is no longer needed, we securely delete or anonymize it.

### **Children's Privacy**

Our website and services are not directed to individuals under the age of 16. We do not knowingly collect personal data from children. If you believe that a minor has provided us with personal data, please contact us so that we can delete it.

## **Changes to This Policy**

We may update this Privacy Policy periodically to reflect changes in our practices or applicable laws. Any updates will be posted on our website with the revised date indicated. We encourage you to review this policy periodically to stay informed about how we protect your data.