

**Guidehouse Supplemental Privacy Policy
For
California Consumers under CCPA**

INTRODUCTION

The California Consumer Privacy Act (“CCPA”) of 2018, as amended, imposes new privacy obligations on certain businesses that collect and use California residents’ personal information. This *Supplemental Privacy Policy for California* explains rights that California consumers may have under the CCPA.

When we use the term “**personal information**” in this supplement, we are using that term as CCPA defines it to mean information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. However, personal information does not include publicly available, deidentified, or aggregate consumer information (which are all defined in the CCPA). Notably, the definition of “**personal information**” also does not apply to the collection of personal information from job applicants or employees (whether you are our employee or an employee of the entity arranging access to our Services for you), business owners, directors, officers, medical staff or contractors.

Where we act as a “business” under CCPA (meaning we determine the manner and reasons for why we process your personal information), we may be required to disclose the categories of personal information we collect, the sources where we obtain that information, the purposes for why we collect that information, and who we share that information – all of which depends on the specific Service.

Category	Examples	Category of Source from which Data is Collected	Purpose of Collection
Identifiers	Contact information, such as: name, home or business postal address, place of business, current employer, job title, email address, phone number, or other similar identifiers.	Directly from “consumer”; directly or indirectly from our clients or their agents	To respond to requests; to send information about Guidehouse’s services or events; to send administrative information or notices; to advertise our services on other Web sites; to communicate in connection with an engagement; to register an account, create a profile, or otherwise engage with our Site; to send newsletters, publications, market research

			reports, surveys to understand your interests and other communications which you request
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	Directly from "consumer"; directly or indirectly from our clients or their agents	To provide our Services; To administer our Client (time and billing) databases and for the purpose of getting paid for the Services we provide; To the extent permitted by applicable law, in order to include selected individuals (our primary contacts within the Client's organization) in our information distribution and to send newsletters, information and marketing materials concerning relevant developments in our various service areas to these individuals; As required by applicable law in order to fulfill our legal, regulatory, administrative, and organizational obligations, including compliance with applicable legislation; To provide training, educational programs, publications and podcasts.
Automatically collected Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Cookies and other tracking technologies as described in the Privacy Policy	To personalize content on our Sites; to track activity on and technical performance of our Site and to evaluate our marketing effort to improve our Sites, to better understand your interests and to improve your experience of using the Site
Geolocation data and mobile device information	Your device's operating system, unique device identifier, and country or state of location	Cookies and other tracking technologies as described in the	To better serve your needs and optimize the services for you

		Privacy Policy	
Career related information	Email address, username, password, first and last name, physical address, phone number, current or past job history and other career data	Directly from the “consumer”	To allow you to set up a profile for your career search and access your account later; to allow processing of your application
Other personal information drawn from third party sources	Demographic information, navigation information, additional contact information	Company websites, social media sites or subscription-based third-party databases	To provide missing information in order to respond to your requests or contact you in relation to billing or account issues, provide better services and better understand your interests.

We use and share personal information as described in the Privacy Policy. Guidehouse does not sell your Personal Information. When we disclose personal information to a recipient for a business purpose, we enter into a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

YOUR PRIVACY RIGHTS.

The CCPA provides California residents (consumers) with specific rights regarding their personal information. If you are a resident of California and are not a job applicant, Guidehouse employee, or employee of another company interacting with us in your job role, you have the right to request what the specific pieces and categories of personal information we collect, use, and disclose. You may also request the sources of personal information collected about you and the purpose for collecting the personal information. You may also request that we delete your personal information.

If you request us to delete your personal information, please note that we may still need to retain certain information for recordkeeping purposes, and/or to complete any transactions that you began prior to requesting such deletion. Some of your information may also remain within our systems and other records where necessary for compliance with applicable law.

We may also deny your deletion request if retaining the information is necessary for us or our service providers to:

1. Provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.

4. Otherwise to comply with applicable law, legal obligations or other lawful uses of that information.

Your request must provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative. Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. You may only make a verifiable consumer request for access or data portability twice within a 12-month period.

California residents can request access to or deletion of your Personal Information by contacting us online at privacy@guidehouse.com or you may call us toll-free at 1-800-304-9649. Please include your name, email address, account identification, if applicable, and purpose of the request.

Guidehouse will respond to requests as required by applicable law. Guidehouse is not obligated (1) to re-identify any data that cannot be linked by Guidehouse to a particular Consumer or (2) to disclose or delete any de-identified information.

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, because you exercise your CCPA rights, we will not:

1. Deny you goods or services;
2. Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
3. Provide you a different level or quality of goods or services;
4. Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

CONTACT

If you have any questions about this Privacy Policy, please contact privacy@guidehouse.com.