

## Notice at Collection of Personal Information

Windes, Inc. and its affiliates, Windes Wealth Management, LLC and Windes Technology & Risk, LLC (also collectively referred to as “we,” “us,” “our”) collect Personal Information in connection with operating our business.

We collect personal information from and about clients, visitors to our website, job applicants and employees. The following tables list the personal information that we may collect from and about these individuals in these groups, along with other important information. (Please note that individuals may belong to more than one group.) If you would like to learn more about our information practices, please visit our Privacy Policy available [here](https://windes.com/privacy-policy/) or at <https://windes.com/privacy-policy/>.

Windes retains client and employee information for the period indicated below or longer if required by applicable law, professional standards, or ongoing client relationships.

### Clients

Categories of Personal Information Collected	Business or Commercial Purposes for Collection/Use	Information Sold or Shared With Third Parties?	Length of Time We Intend to Retain the Information
<b>Identifiers</b> (e.g., name, address, email, phone number)	To provide tax, audit, accounting, advisory and related professional services and market our services to you	No	7 years
<b>Identifiers</b> (e.g., IP address, device ID)	To provide website content, maintain security / improve our systems, and market our services including cross-context behavioral advertising	Yes	Typically 2 months, but possibly longer in archived storage or logs
<b>Customer Records</b> (e.g., bank or credit card information)	To provide tax, audit, accounting, advisory and related professional services	No	7 years
<b>Protected Classification Characteristics</b> (e.g., date of birth, marital status)	To provide tax, audit, accounting, advisory and related professional services	No	7 years
<b>Medical information</b> (e.g., bills or receipts)	To provide tax, audit, accounting, advisory and related professional services	No	7 years
<b>Commercial information</b> , (e.g., records of products or services purchased or considered)	To provide tax, audit, accounting, advisory and related professional services and market our services to you	No	7 years

Categories of Personal Information Collected	Business or Commercial Purposes for Collection/Use	Information Sold or Shared With Third Parties?	Length of Time We Intend to Retain the Information
<b>Internet or other electronic network activity</b> (e.g., website interactions, browser type, analytics data)	To provide tax, audit, accounting, advisory and related professional services, maintain and improve website functionality, and market our services including cross-context behavioral advertising	Yes	Typically 2 months, but possibly longer in archived storage or logs
<b>Professional or Employment Information</b> (e.g., employer, job title)	To provide tax, audit, accounting, advisory and related professional services and market our services to you	No	7 years
<b>Sensitive Personal Information</b> (e.g., social security or passport number, racial or ethnic origin, citizenship or immigration status)	To provide tax, audit, accounting, advisory and related professional services	No	7 years
<b>Audio, Electronic, or Visual Data</b> (e.g., video calls, voicemail, emails)	To provide tax, audit, accounting, advisory and related professional services and for training purposes	No	Typically 2 months but possibly longer in archived storage or logs
<b>Geolocation data</b> (e.g., approximate location inferred from IP address)	To provide tax, audit, accounting, advisory and related professional services and to market our services to you	No	Typically 2 months, but possibly longer in archived storage or logs
<b>Inferences Drawn</b> (e.g., preferences, service needs, risk tolerance, or business characteristics inferred from data)	To provide tax, audit, accounting, advisory and related professional services and market our services to you	No	No longer than the underlying data on which the inference is based

#### Visitors to our Website, [www.Windes.com](http://www.Windes.com)

Categories of Personal Information Collected	Business or Commercial Purposes for Collection, / Use	Information Sold or Shared With Third Parties?	Length of Time We Intend to Retain the Information
<b>Identifiers</b> (e.g., IP address, device ID)	To provide website content, maintain security / improve our systems, and market our services including cross-context behavioral advertising	Yes	Typically 2 months, but possibly longer in archived storage or logs

Categories of Personal Information Collected	Business or Commercial Purposes for Collection, / Use	Information Sold or Shared With Third Parties?	Length of Time We Intend to Retain the Information
<b>Internet or other electronic network activity</b> (e.g., website interactions, browser type, analytics data)	To provide website content, maintain and improve website functionality, and market our services including cross-context behavioral advertising	Yes	Typically 2 months, but possibly longer in archived storage or logs
<b>Geolocation Data</b> (e.g., approximate location inferred from IP address)	To provide tax, audit, accounting, advisory and related professional services and to market our services to you	No	Typically 2 months, but possibly longer in archived storage or logs
<b>Inferences Drawn</b> (e.g., preferences, service needs, risk tolerance, or business characteristics inferred from data)	To provide tax, audit, accounting, advisory and related professional services and market our services to you	No	No longer than the underlying data on which the inference is based

### Job Applicants

Categories of Personal Information Collected	Business or Commercial Purposes for Collection / Use	Information Sold or Shared With Third Parties?	Length of Time We Intend to Retain the Information
<b>Identifiers</b> (e.g., name, address, email, phone number, passport number, social security number)	To recruit and evaluate job applicants	No	4 years
<b>Protected Classification Characteristics</b> (e.g., race, gender, disability or veteran status)	Diversity, equity and inclusion reporting	No	4 years
<b>Professional or Employment Information</b> (e.g., employment history, professional licenses)	To recruit and evaluate job applicants	No	4 years
<b>Education Information</b> (e.g., schools attended, degrees)	To recruit and evaluate job applicants	No	4 years
<b>Audio, Electronic, or Visual Data</b> (e.g., video calls, voicemail, emails)	To recruit and evaluate job applicants	No	4 years

Categories of Personal Information Collected	Business or Commercial Purposes for Collection / Use	Information Sold or Shared With Third Parties?	Length of Time We Intend to Retain the Information
<b>Inferences Drawn</b> (e.g., assessments derived from application data)	To recruit and evaluate job applicants	No	No longer than the underlying data on which the inference is based

## Employees

Categories of Personal Information Collected	Business or Commercial Purposes for Collection / Use	Information Sold or Shared with Third Parties?	Length of Time We Intend to Retain the Information
<b>Identifiers</b> (e.g., name, address, email, phone number)	Human resources management and employment administration	No	4 years
<b>Customer Records</b> (e.g., bank account number)	Human resources management and employment administration (direct deposit)	No	4 years
<b>Protected Classification Characteristics</b> (e.g., date of birth, marital status, disability status)	Human resources management and employment administration, including administration of benefits and accommodations	No	4 years
<b>Internet or other electronic network activity</b> (e.g., use of firm devices, email, browser history, VPN, log-in data)	Human resources management and employment administration, and to maintain network security, monitor access and investigate incidents	No	4 years
<b>Professional or Employment Information</b> (e.g., employment history, professional licenses)	Human resources management and employment administration	No	4 years
<b>Visual Data</b> (e.g., photos of our employees)	Human resources management and employment administration	No	Photos in our employee directory are removed at termination. Group photos can remain for an unlimited period of time.
<b>Medical or Health Information</b> (e.g., health conditions, disabilities)	Human resources management and employment administration, including administration of benefits and consideration of requests for reasonable	No	4 years

Categories of Personal Information Collected	Business or Commercial Purposes for Collection / Use	Information Sold or Shared with Third Parties?	Length of Time We Intend to Retain the Information
	accommodations		
<b>Sensitive Personal Information</b> (e.g., social security or passport number, racial or ethnic origin, citizenship or immigration status, religious or philosophical beliefs, or union membership))	Human resources management and employment administration, including administration of benefits and consideration of requests for reasonable accommodations	No	4 years
<b>Audio, Electronic, or Visual Data</b> (e.g., voicemail, emails, video calls)	Human resources management and employment administration	No	180 days, unless retained for training purposes
<b>Background Information</b> (e.g., information collected as a result of a background check conducted by our service provider after you consent, such as criminal history, employment history, education history)	Human resources management and employment administration, and to comply with legal requirements	No	4 years (summary)
<b>Inferences Drawn</b> (e.g., assessments derived from performance)	Human resources management and employment administration	No	4 years

### Notice of Right to Opt-Out of Sale or Sharing of Personal Information

You can find our Notice of Right to Opt-Out of Sale or Sharing of Personal Information [here](#).

### Notice of Right to Limit Use of Sensitive Personal Information

You have the right to request that we limit the use of your sensitive personal information for limited purposes, such as providing you with the services you requested. Please note that we use your sensitive personal information only as permitted by law.

You may exercise your privacy rights by calling (562) 435-1191, or by completing the interactive web form accessible at <https://windes.com/contact-us/>.