



## PRIVACY POLICY

OCTOBER 2019

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## PURPOSE

At Drawbridge Partners, LLC (“**Drawbridge Partners**,” “we,” “us,” “our” or the “**Firm**”), your privacy is important to us. This Privacy Policy describes our privacy practices and provides information on the type of personal data we process, our processing methods, and processing purposes.

This Privacy Policy governs the personal data we collect for Drawbridge Partners business purposes, whether it is from our clients, our website, or other resources, as fully described in this Privacy Policy.

For the purposes of this Privacy Policy:

- “Personal data” means any information relating to an individual who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. The definition of personal data under this Privacy Policy includes any information that is subject to privacy laws and regulations applicable to our business.
- “Process”, “Processes”, “Processing”, or “Processed” means any operation which is performed on personal data, whether or not by automated means, such as collection, recording, structuring, storing, adapting, altering, retrieving, consulting, using, disclosing by transmission, erasing, destructing, disseminating, or otherwise making available.

## EU-US AND SWISS-US PRIVACY SHIELD FRAMEWORK COMPLIANCE

Drawbridge Partners complies with the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries, the United Kingdom, and Switzerland transferred to the United States pursuant to Privacy Shield. Drawbridge Partners has certified that it adheres to the Privacy Shield Principles with respect to such data. If there is any conflict between the policies in this privacy policy and data subject rights under the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>.

With respect to personal data received or transferred pursuant to the EU-US and/or Swiss-US Privacy Shield Frameworks, Drawbridge Partners is subject to the regulatory enforcement powers of the Federal Trade Commission.

Pursuant to the Privacy Shield Frameworks, EU, UK, and Swiss individuals have the right to obtain our confirmation of whether we maintain personal information relating to you in the United States. Upon request, we will provide you with access to the personal information that we hold about you. You may also correct, amend, or delete the personal information we hold about you. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data transferred to the United States under Privacy Shield, should direct their query to [privacy@drawbridgepartnersllc.com](mailto:privacy@drawbridgepartnersllc.com). If requested to remove data, we will respond within a reasonable timeframe.

We will provide an individual opt-out choice, or opt-in for sensitive data, before we share your data with third parties other than our agents, or before we use it for a purpose other than which it was originally collected or subsequently authorized. To request to limit the use and disclosure of your personal information, please submit a written request to [privacy@drawbridgepartnersllc.com](mailto:privacy@drawbridgepartnersllc.com).

In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Drawbridge Partners' accountability for personal data that it receives in the United States under the Privacy Shield and subsequently transfers to a third party is described in the Privacy Shield Principles. In particular, Drawbridge Partners remains responsible and liable under the Privacy Shield Principles if third-party agents that it engages to process personal data on its behalf do so in a manner inconsistent with the Principles, unless Drawbridge Partners proves that it is not responsible for the event giving rise to the damage.

## **DISPUTE RESOLUTION**

In compliance with the Privacy Shield Principles, Drawbridge Partners commits to resolve complaints about your privacy and our collection or use of your personal information transferred to the United States pursuant to Privacy Shield. European Union, United Kingdom, and Swiss individuals with Privacy Shield inquiries or complaints should first contact Drawbridge Partners at:

Drawbridge Partners, LLC  
Three Stamford Landing  
46 Southfield Avenue | Suite 450  
Stamford, CT 06902  
(203) 569-6400

[privacy@drawbridgepartnersllc.com](mailto:privacy@drawbridgepartnersllc.com) or filling out the contact us form located at [Contact Us](#)

Drawbridge Partners has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit [www.bbb.org/EU-privacy-shield/for-eu-consumers](http://www.bbb.org/EU-privacy-shield/for-eu-consumers) for more information and to file a complaint. This service is provided free of charge to you.

If your Privacy Shield complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See Privacy Shield Annex 1 at <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>.

## **TYPES OF PERSONAL DATA COLLECTED**

Drawbridge Partners may collect the following categories of personal data:

- Full Name
- Company
- Title or Position

- Mailing Address
- Email Address
- Telephone Number
- Business Contact Information
- Username and Password
- Any other personal data you provide Drawbridge Partners access to via our portals, website, email, or any other means of communication

## **LEGAL BASIS FOR PROCESSING**

Drawbridge Partners only collects personal data from you or about you that is reasonably necessary for us to provide the applicable products or services you have engaged us for, to contact you for the purposes of carrying out our contractual obligations, to establish a business relationship with you, to send your marketing communications in accordance with your communication preferences, for a legitimate business interest, or to comply with our legal or regulatory obligations.

Where consent is required, Drawbridge Partners will request your consent to process your personal data. You are free to withdraw your consent at any time by contacting [privacy@drawbridgepartnersllc.com](mailto:privacy@drawbridgepartnersllc.com).

## **HOW WE COLLECT YOUR PERSONAL DATA**

Drawbridge Partners may collect personal data from the following sources:

- You directly (i.e., email, phone, in-person)
- Our website or social media accounts, if you choose to submit your information through our website or social media accounts
- Our third-party or hosted portals
- Publicly available databases

## **HOW WE PROTECT YOUR PERSONAL DATA**

Drawbridge Partners has reasonable technical, administrative, and physical security measures in place to protect your personal data. If you have reason to believe that our security measures or your interactions with us are no longer secure (i.e., you feel that the security of an account you have with us may have been compromised), please contact us immediately at (203) 569-6400 or [privacy@drawbridgepartnersllc.com](mailto:privacy@drawbridgepartnersllc.com).

## **RETENTION OF YOUR PERSONAL DATA**

Drawbridge Partners retains your personal data as necessary to fulfill our services, for the purposes outlined in this Privacy Policy, in accordance with Drawbridge Partners' retention policies, and as required or permitted by law.

## HOW YOUR PERSONAL DATA IS SHARED

To the extent permitted by law and subject to any contractual limitations on sharing personal data (as set forth in the relevant agreement for products or services), we may share your personal data with our affiliates, subsidiaries, and business partners for the purposes described in this Privacy Policy. We may also share your personal data in the following circumstances:

- **Third-Party Service Providers:** We may share your personal data with third parties who perform services on our behalf such as, but not limited to, hosting or operating our services or sites, accounting or audit services, tax services, legal services, or IT services. We do not authorize these third parties to use your personal data for purposes other than for which it has been provided, and we do not authorize these third parties to disclose your personal data to unauthorized parties. We require these third parties to maintain appropriate security to protect your information from unauthorized access or processing.
- **Legal Authorities or Basis:** We may share your personal data with legal or regulatory authorities, courts, and government agencies, where we believe that doing so would be in accordance with, permitted, or required by any applicable law, regulation, or legal process to defend the interests, rights, or property of Drawbridge Partners.
- **Sale of Business:** We may transfer your personal data to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, brands, affiliates, subsidiaries or other assets. To the extent permitted by applicable law, we may share your personal data with a prospective buyer or transferee of the business as part of the diligence process, provided that we require any such third party to maintain the confidentiality of your personal data and protect it with appropriate technical, administrative, and physical security measures.

Drawbridge Partners may share your personal data with other third parties as directed by you or subject to your consent. Under no circumstances does Drawbridge Partners sell, trade, or rent your personal data.

## YOUR COMMUNICATION PREFERENCES

You may choose to receive or not receive marketing communications from Drawbridge Partners by:

- Contacting us at [privacy@drawbridgepartnersllc.com](mailto:privacy@drawbridgepartnersllc.com)
- Replying to any marketing email communication you receive from us and requesting to be unsubscribed from future marketing email communications

We will try to comply with your request as soon as reasonably practicable as required by law. Please note that we may need to retain certain information for recordkeeping purposes, to complete any transactions that you began prior to your request, or for other purposes as required or permitted by law. In addition, please note that even if you opt-out of receiving marketing communications, we may need to send you service-related communications.

If you have questions regarding your communication preferences or our marketing activities, please contact us at [privacy@drawbridgepartnersllc.com](mailto:privacy@drawbridgepartnersllc.com).

## **YOUR RIGHTS & REQUESTS**

You may have the following set of rights with respect to your personal data:

- Right to access your personal data
- Right to request information regarding your personal data
- Right to request correction of your personal data
- Right to request transfer of your personal data
- Right to request erasure of your personal data
- Right to withdraw your consent to the processing of your personal data
- Right to object to the processing of your personal data
- Right to restrict or limit the processing your personal data
- Right to lodge a complaint with a supervisory authority (such as the supervisory authority in your member state of habitual residence or place of work or where the alleged infringement took place)

You may also have the right to make a GDPR complaint to the relevant Supervisory Authority. A list of Supervisory Authorities is available here: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en)

Please note that the above-mentioned rights may not be applicable to you in certain cases and are subject conditions as specified under the applicable law. Drawbridge Partners may require you to verify your identity if you elect to exercise your rights, and we will try our best to comply with your request as soon as reasonably practicable, but no later than the timeframe required by law.

For more information regarding your rights or to exercise your rights, please contact us at [privacy@drawbridgepartnersllc.com](mailto:privacy@drawbridgepartnersllc.com).

## **COOKIES & SIMILAR TECHNOLOGIES**

Our website may use cookies and similar technologies to improve the performance of our website, help address technical issues, and allow you to engage in our social media offerings. Our website may also collect non-personal data either directly or through a third-party service (e.g. Google Analytics).

“Cookies” are automatically collected pieces of data that identifies you as a unique user, facilitates your ongoing access to and use of this website, and helps diagnose server problems. If you prefer to disable cookies on this website, we suggest consulting the Help section of your browser.

## **AUTOMATED DECISION-MAKING**

Drawbridge Partners does not engage in decision-making based on the automated processing of your personal data, including profiling, which produces legal effects concerning an individual or similarly significantly affects an individual.

## LINKS TO THIRD-PARTY WEBSITES & SERVICES

This Privacy Policy does not apply to the websites of our service providers, subcontractors, or any other third parties, even if their websites are linked to our website. We have no control over third-party websites, and your use of third-party websites and features are subject to privacy policies posted on those websites. We are not responsible or liable for the privacy or business practices of any third-party websites linked to our website. We encourage you to read the privacy policies located on each third party's website.

## CHILDREN'S PRIVACY

Drawbridge Partners takes children's privacy seriously. We do not knowingly collect personal data from minors (children under 13 years of age, or any other age defined under applicable law). If we become aware that a minor is attempting to or has submitted personal data via our website, we will notify the user that we may not accept his or her personal data. We will then remove any such personal from our records.

## CHANGES TO THIS PRIVACY POLICY

Except as limited by law, Drawbridge Partners reserves the right to make changes to this Privacy Policy. If we materially change our personal data processing activities, we will revise this Privacy Policy to reflect such changes. We encourage you to periodically review this Privacy Policy in order to stay informed of how we are using and protecting your personal data.

## CONTACT US

If you have any questions, comments, or complaints about our Privacy Policy or privacy practices, please contact us at:

**Drawbridge Partners, LLC**  
Three Stamford Landing  
46 Southfield Avenue, Suite 450  
Stamford, CT 06902  
USA  
(203) 569-6400  
[privacy@drawbridgepartnersllc.com](mailto:privacy@drawbridgepartnersllc.com)