

Privacy Statement

[NOTICES PURSUANT TO THE CALIFORNIA CONSUMER PRIVACY ACT \(AS AMENDED BY THE CALIFORNIA PRIVACY RIGHTS ACT\) AND THE VIRGINIA CONSUMER DATA PROTECTION ACT](#)

[CALIFORNIA CONSUMER PRIVACY RIGHTS ACT POLICY AND NOTICE OF COLLECTION OF PERSONAL INFORMATION FOR CALIFORNIA EMPLOYEES, APPLICANTS, AND INDIVIDUAL SERVICE PROVIDERS](#)

[EU PRIVACY NOTICE](#)

[COOKIE SETTINGS](#)

Purpose of this Privacy Statement

At Helix Financial Systems, L.P. (collectively, “Helix”, “we”, “our” or “us”), we are committed to handling your information responsibly and would like to let you know that we recognize and respect your right to privacy.

This Privacy Statement describes the types of personal information (1) we collect on the Helix websites (collectively, the “Sites”), as well as in connection with your business dealings with us any job application you may submit to us or your employment or contractual engagement with us, and (2) how we may use that information and to whom we may disclose it.

As used in this Privacy Statement the terms “include(s)” and “including” mean “including without limitation.”

This Privacy Statement may be updated by us at any time and any changes will be effective once posted on the Sites.

1. Personal information we collect and how we use it

- a. We may collect, and may have collected in the past twelve months, the following categories of personal information, as and where applicable:
 - Identifiers (for example real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, bank account number, credit card number, debit card number, or any other financial information, or other similar identifiers);
 - Your signature, physical characteristics or description, insurance policy number, education, employment, employment history, medical information, or health insurance information;
 - Characteristics of protected classifications under applicable laws;
 - Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies;
 - Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer’s interaction with an internet website application, or advertisement;

- Geolocation data;
- Audio, electronic, visual, or similar information;
- Professional or employment-related information; and
- Sensitive personal information (for example, social security number, driver's license number, passport number);
- Other categories of information described in:
 - [California Consumer Privacy Rights Act Policy and Notice of Collection of Personal Information for California Employees, Applicants, and Individual Service Providers](#)
 - [EU Privacy Notice](#)
 - [Customer Privacy Notice](#)

2. How we may receive your personal information and how we may use it:

a. Information you provide to us. We collect information that you provide to us when you access and use our Sites or communicate with us (for example, engage in business dealings with us, apply for a job with us), including as follows:

- Access to our Sites, newsletter subscriptions and email alerts. You may register an account with us or sign up to receive news, alerts and publications from Helix. To register or sign-up we may ask you for information, including your name, email address and topics of interest. We will use this information to send you the communications you request. We may also use this information to communicate with you about other topics which we think may be of interest to you. If you are a registered user/have an account with us, you can unsubscribe from receiving these e-mails at any time by clicking the "unsubscribe" link contained in our email messages.
- Contact Us. If you communicate with us through the one of our contact links on our Sites or otherwise, we may ask you for information including your name, email address and telephone number so we can respond to your questions and comments.
- Use of the Site. We may collect information about your actions on the Sites and content you post to the Sites, including comments or inquires you may post or ask to the Sites.
- Business dealings. For example, you or your employer may provide information to us, or we may ask for information in connection with account openings, applications, subscriptions, other forms or business transactions. Please see our Customer Privacy Policy.

b. Information from Tracking Technologies. When you access or use our Sites we may also collect usage information through cookies, clear gifs, log files, and other tracking technologies including third party analytics partners (such as Google Analytics and Matomo) to assist with this collection. The type of information collected may include information about how you use

the website (e.g., the pages you view, the links you click), information about your browser and usage patterns (e.g., your IP address, browser type, referring/exit pages), and information about your device used to access the website (e.g., mobile device ID, device type and operating system). We use this information to monitor aggregate use metrics, analyze traffic patterns, track content you may be interested in, diagnose and fix technology problems and otherwise plan for and enhance our Sites. Please note that, as of the latest update of this Privacy Statement, the Sites do not currently take actions to respond to “Do Not Track” signals in browsers. Please see [Cookie Settings](#).

- c. **Information from other sources.** We may obtain information from other sources, for example third-party information providers (including, for example consumer reporting agencies), or through mergers and acquisitions, and we may combine this with information previously collected.
- d. **Information you provide to us in connection with any job application you may submit to us your or your employment or contractual engagement with us.** Please see our [California Consumer Privacy Rights Act Policy and Notice of Collection of Personal Information for California Employees, Applicants, and Individual Service Providers](#).
- e. **In addition to the uses described above, we may also use the personal information you provide and/or we collect on the Sites as follows:**
 - To operate, maintain, and provide to you the features and functionality of the Sites and to conduct business dealings with you.
 - Manage the day-to-day operations of the Sites and maintain the links we provide to you.
 - To contact you (including by e-mail), in order to respond to your inquiries and comments.
 - To monitor, enhance, and improve the Sites and any products or services we may provide through the Sites, including through market research and data analytics.
 - Communicate directly with you, such as to send you email messages about our products and services.
 - For compliance with our legal obligations and policies and procedures.

3. Information we disclose

We are not in the business of selling your information. We consider this information to be a vital part of our relationship with you and do not disclose your personal information to any third party except when explicitly authorized by you. Notwithstanding the foregoing, there are, however, certain circumstances in which we may disclose your personal information with certain to third parties without further notice to you, as set forth below:

- **Within the Helix Financial Systems, L.P. group:** We may make personal information available to other companies and brands owned or controlled by Helix Financial Systems, L.P. and other companies under common ownership with Helix Financial Systems, L.P.

These companies will use your personal information in the same way as we may use it under this Privacy Statement.

- **Our third-party service providers:** We may disclose personal information to our service providers or business partners who help us deliver or improve our services or who perform services on our behalf, including software, system and platform support, cloud hosting services, advertising, data analytics, administrative or business management, and order fulfilment and delivery. Our third-party service providers are required only to disclose or use personal information we make available to them for the purpose of providing services to us.
- **Third parties for legal reasons:** We may disclose personal information to third parties to the extent that we determine in good faith that we are required to do so under any applicable laws, rules or regulations, orders, or in enforcement of our rights or property or the defense of claims, if we reasonably believe disclosure is necessary to prevent harm or financial loss, in connection with preventing fraud or illegal activity, and/or to enforce our rights.
- **Third parties due to sale or transfer of business or assets:** We may disclose personal information to third parties in the event of a merger, sale, restructure, acquisition, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings). In such event we will use reasonable efforts to ensure that any transferred information is treated in a manner consistent with this Privacy Statement.
- **Other:** We may disclose information in an aggregated or deidentified form with third parties, for example, in order to facilitate our business operations.

We do not disclose your personal information or company information with third parties for marketing purposes without your consent.

4. Links to other sites

Occasionally, we provide links to other websites for your convenience and information. These websites operate independently from our Sites and are not under our control.

These websites may have their own privacy notices or terms of use, which we strongly suggest you review if you visit any linked websites. We are not responsible or liable for the content of these websites, any products or services that may be offered through these websites, or any other use of the linked websites.

5. How we protect personal information

We maintain reasonable security procedures and practices as well as administrative, technical and physical safeguards that are designed to protect against loss, misuse, unauthorized access, disclosure, alteration or destruction of the personal information we collect.

6. Data processing locations

We may transfer the personal information we collect to other countries where we do business, which may not have the same data protection laws as the country in which you reside. The measures we may take to provide appropriate levels of data protection may include approved standard contractual clauses, intragroup agreements, and other measures designed to cause recipients of your personal information to protect it. We partner with and are supported by service providers, including some who are located outside the European Economic Area. By using our services, you understand that your personal data may be transferred to our facilities and those third parties to whom we disclose it described in this Privacy Statement.

7. Minor information

Please note that this website is not designed to be used by, nor do we collect any personal information from, individuals under the age of majority.

8. Data Retention

We retain the personal information we receive as described in this Privacy Statement for as long as you use our services or as necessary to fulfill the purpose(s) for which it was collected, provide our services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws, rules and/or regulations.

9. Additional Rights

a. Additional US State Rights

Consumers who are residents of states with data protection laws may be entitled to additional notices and rights regarding our collection and use of their personal information. Please see our Notices Pursuant to the [California Consumer Privacy Rights Act \(as amended by the California Privacy Rights Act\) and the Virginia Consumer Data Protection Act](#).

b. Additional Rights of Employees, Applicants and Individual Service Providers

Our employees, job applicants and individual service providers who are California residents may be entitled to additional notices and rights regarding our collection and use of their personal information. Please see our [California Consumer Privacy Rights Act Policy and Notice of Collection of Personal Information for California Employees, Applicants, and Individual Service Providers](#).

c. California Shine the Light Disclosure

California's "Shine the Light" law (Civil Code Section § 1798.83) permits California residents who use the Sites or engage in business dealings with us the right to request certain information regarding our disclosure of personal information (as defined in California Civil Code Section 1798.83(e)(7), available at this link: [Cali. Civ. Code Section](#)

[1798.83\(e\)\(7\)](#)) to third parties for their direct marketing purposes. To make a request to access such information, please contact us at CCPA@Helixfs.com. After receiving such a request, we will provide a list of the categories of such personal information disclosed to third parties for third-party direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of these third parties. This request may be made no more than once per calendar year. We reserve our right not to respond to requests submitted other than to the address specified in this paragraph.

d. Additional EU Resident Rights

Please see below for the rights available to EU residents under the General Data Protection Regulation (EU) 2016/679 (“GDPR”).

Your personal information will be controlled by the relevant affiliate of Helix Financial Systems, L.P. that is providing services to you or communicating with you and each such entity is regarded as an independent controller of your personal information. This Privacy Statement applies to all such entities.

The GDPR entitles European residents certain rights in relation to their personal information. Under certain circumstances, if you are a European resident by law you have the right to:

update, modify, delete or obtain (commonly known as a “subject access request”) a copy of the personal information that we have collected; or restrict or stop us from using any of the personal information that we have collected.

You can exercise these rights by contacting dpm@helixfs.com. We endeavor to respond to such requests within a month or less, although we reserve the right to extend this period for requests we deem complex. Where appropriate, we will respond to your requests in writing or by email. If you require our response in a different format, please let us know.

In addition, if EU based individuals have a complaint about the way we have handled their personal information or a subject access request, they have the right to contact a supervisory authority to lodge a complaint. They may contact the supervisory authority in the European Union (or European Economic Area) state where they work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/make-a-complaint/> or telephone: 0303 123 1113.

Please see the full [EU Privacy Notice](#) for additional information.

10. Contact Us

If you have any questions about this Privacy Statement, the practices of the Sites, or your dealings with the Sites, please contact us at ComplianceNY@helixfs.com.

Last updated: January 1, 2023