



Privacy Policy and Information Notice

NKSFB LLC (“NKSFB”) is committed to maintaining the confidentiality of the personal information of our clients, employees, and website visitors. We’ve updated our Privacy Policy and improved our privacy practices so we can better safeguard your data.

This Privacy Policy (together with our Terms of Use and any other policies referenced) identifies how we will collect and handle any personal information that we collect from you, or that you provide to us.

If you are a California resident, our privacy practices comply with the California Consumer Privacy Act of 2018 (“CCPA”), and any CCPA-specific information is identified in this Policy. Explanation of your rights under the CCPA can be found [here](#).

If you are a resident of the European Economic Area (“EEA”), this Privacy Policy also outlines additional policies applicable to our collection and processing of your personal information, which can be found [here](#).

As our services evolve and we perceive the need or desirability of using your personal data collected in other ways, we may from time to time amend this Privacy Policy. The effective date appears at the end of this Privacy Policy. We encourage you to check our Site frequently to review the current Privacy Policy in effect and any changes that may have been made to it.

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1. Introduction

This Privacy Policy describes how NKSFB collects, uses, and shares personal information of our clients, prospective employees, visitors to our website at www.nksfb.com (“Site”), and individuals who contact us to request information. The Website and our other programs and services are the “Services.” This Policy describes how we obtain and use personal information (which can be used to identify a specific individual) and anonymous data (which cannot).

Region specific provisions. Certain provisions of this Policy, which are clearly labelled, apply only to users who are citizens or residents of particular regions (e.g., the EU or California). Otherwise, this Policy applies to all users of our Services, regardless of location.

Children. The Services are not directed to children. See [Protecting children’s privacy below.](#)

2. What Personal Information does NKSFB collect?

For purposes of this Policy, “Personal Information” means information (whether stored electronically or in paper based filing systems) relating to a living individual who can be identified from that data (or from that data and other information in our possession). Personal Information comprises the categories of Personal Information defined by the CCPA.

Identifiers	Name, address, email, phone, ssn, driver’s license
Other Data	Financial information, medical information, health insurance information
Protected Classes	Race, gender, sexual orientation, religion, citizenship
Commercial Information	Records of personal property, purchasing or consuming histories or tendencies
Biometric Information	Fingerprints, retina scans, face prints
Internet Activity	Browsing history, search history, IP address, website interactions
Geolocation Data	GPS coordinates, location history
Sensory Data	Audio, electronic, visual, thermal, olfactory
Professional Data	CV, resume, employment history
Education Data	Educational background, grades, scores

Inferences	Drawn the above categories, such as preferences, characteristics, attitudes, predispositions, abilities, aptitudes, intelligence, psychological traits
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The examples given in this table are not meant to provide an exhaustive list, but are examples of the kinds of data included in each category. NKSFB does not collect Personal Information in every one of these categories, and we identify below which categories of information we do collect. Personal Information under the CCPA also includes any other category of personal information not included within the CCPA’s definition that are defined in California Civil Code § 1798.80(e). We refer to this category as “Other Data,” and it includes information such as financial information (bank account number, credit card number, debit card number), medical information, health insurance information, and insurance policy number.

NKSFB collects only that Personal Information that is relevant for the purposes for which the data is requested. NKSFB does not use your Personal Information in any way that is incompatible with the purposes for which it was collected or for which you have consented.

2.1 Personal Information Collected about Clients

In order to provide our clients with individualized services, we collect certain non-public, personal information about you from documents you provide to us, such as your tax returns, your contracts, and your bank and investment account statements. In addition to receiving personal information directly from you, we may also receive information from your attorney, bank, securities broker, other investment advisers, and other sources. We will only obtain such information from third parties with your express consent, as permitted by law.

We may collect the following categories of Personal Information from our clients:

- **Identifiers:** name, address, email, phone, social security number, federal tax ID number, passport, driver’s license, or other relevant identifiers, as applicable.
- **Other Data** (§ 1798.80): Financial information such as credit card and account numbers; financial records, such as tax information, securities filings, etc.; medical and health records and data as necessary, including health insurance accounts and records.
- **Protected Classes:** gender, race, sexual orientation, and citizenship information, as necessary.
- **Commercial Information:** records of purchasing history, as needed.
- **Biometric Information:** we may occasionally collect biometric information as incidental to applications for passports, driver’s licenses, and other registrations.
- **Professional Data:** we may occasionally collect professional data such as C.V., salary history, and education history, as necessary.



- **Education Information:** educational background, schools attended, alumni organizations, as needed.

We do not collect **Internet Activity** or **Sensory Data** from or about our clients.

2.2 Personal Information Collected about Prospective Employees

We may collect the following categories of Personal Information from individuals seeking employment with NKSFB and entering information within the NKSFB employment portal on our website:

- **Identifiers:** name, address, email, phone, social security number, and other relevant identifiers, as applicable.
- **Other Data** (§ 1798.80): Financial information required to conduct credit checks; medical and health information, as necessary.
- **Protected Classes:** gender, race, sexual orientation, and citizenship information, as necessary.
- **Professional Data:** professional data such as C.V., salary history, education history, citizenship information.
- **Education Information:** educational background, schools attended, alumni organizations, as needed.

We do not collect **Commercial Information, Biometric Information, Internet Activity** or **Sensory Data** from prospective employees.

2.3 Personal Information Collected about Website Visitors or Callers

We may collect the following categories of Personal Information from Visitors to our website and others who contact us to request information:

- **Identifiers:** name, address, email, phone, if you contact us to request information about services;
- **Internet Activity:** When you visit our Site, our web server automatically collects and stores the following information:
 - Like most websites, we collect information that web browsers, mobile devices, and servers typically make available, including browser type, IP address, unique device identifiers, language preference, referring website, date and time of access, operating system and mobile network information.



- We may also determine the approximate location of your device from your IP address. We collect and use this information to determine statistics about our website, including how many people visit our website from certain geographic regions;
- Our Site uses cookies and pixel tags to collect this information, including Google Analytics cookies.
- You can block our use of cookies through settings in your browser. Because these settings are different in different browsers, we recommend that you visit All About Cookies at www.allaboutcookies.org, where you can find comprehensive information on cookie management and blocking for a wide variety of browsers.

We do not collect any other categories of information from our website visitors or individuals who contact us to request information.

3. How does NKSFB use Personal Information?

3.1 Personal Information Collected about Clients

We will use this information:

- to provide you with the Services that you request from us;
- to carry out our obligations arising from any contracts entered into between you and us or any affiliated companies or third party vendors;
- to contact you in the future to provide you with information about other products and services we offer, or that are offered by our affiliates or third party vendors;
- to notify you about changes to our Services;
- to comply with applicable laws and regulations;

3.2 Personal Information Collected about Prospective Employees

We will use this information:

- to respond to and process your job application and CV;
- to make inquiries about you for credit and reference purposes.

3.3 Personal Information Collected about Website Visitors or Callers

We will use this information:



- to provide information you requested about our Services;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- as part of our efforts to keep our site safe and secure.

4. Do we share your Personal Information with any third parties?

NKSFB does not sell your Personal Information to any third parties. To provide the Services, we sometimes disclose Personal Information to service providers for business purposes. Sometimes we disclose your Personal Information that we have collected to those third parties; in other cases, the third parties collect your Personal Information in the first instance and provide it to us.

Our service providers are contractually obligated to comply with all applicable laws (e.g., the CCPA), and all such third parties use your Personal Information only on behalf of NKSFB and under the instructions of NKSFB on how your information may be used and processed. NKSFB takes reasonable steps to ensure these third parties use your Personal Information only for the purposes for which they have been engaged by NKSFB, that they do not share or sell your Personal Information to anyone else.

By using our Services and sharing your Personal Information, you agree that we have the right to share the categories of Personal Information we collect, as identified in Section 2 with our service providers for the following business purposes identified below.

4.1 Personal Information Collected about Clients

We do not disclose any Personal Information about our clients or former clients to service providers except as permitted by law and/or with your consent. Personal Information about you and our former clients may be disclosed to service providers for the following business purposes:

- **Contractual performance** – We provide information to service providers who perform services or functions for us pursuant to a contractual agreement that prohibits the service provider from disclosing or using the information other than for the purposes for which the information was disclosed; for example, using an outside service bureau to process clients’ tax returns, or using a records-retention agency to store clients’ records
- **Merger or Sale** – A review of a professional practice in conjunction with a prospective purchase, sale, or merger of all or part of our practice, provided that we take appropriate precautions (for example, through a written confidentiality agreement) so the prospective purchaser does not disclose information obtained in the course of the review.



We may also disclose personal information about our clients to third parties as permitted by law. This may include disclosure for the following additional purposes:

- Participating in actual or threatened legal proceedings or alternative dispute resolution proceedings either initiated by or against us, provided we disclose only the information necessary to file, pursue, or defend against the lawsuit, and take reasonable precautions to ensure that the information disclosed does not become a matter of public record.
- In the event that we sell or buy any business or assets, in which case we will disclose your Personal Information to the prospective seller or buyer of such business or assets as part of the purchase, transfer, or sale of services or assets;
- If we sell all or substantially all of our assets to a third party, in which case personal information about our customers will be one of the transferred assets;
- If we are under a duty to disclose or share your Personal Information in order to comply with any legal obligation, or any lawful request by public authorities (including to meet national security or law enforcement requirements), or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of us, our customers, or others.

4.2 Personal Information Collected about Prospective Employees

We do not disclose any Personal Information about prospective employees and job applicants except as permitted or required by law. Personal Information about prospective employees and job applicants may be disclosed to service providers for the following business purposes:

- To verify information provided on the job application and CV;
- To perform a credit check on the job applicant, but only after obtaining consent to do so.

In some instances we received Personal Information about prospective employees and job applicants from third party services providing employment referrals. In such situations, one we receive the Personal Information we do not disclose it except as set forth in this section.

4.3 Personal Information Collected about Website Visitors or Callers

We do not disclose to any third parties Personal Information collected from website visitors or callers seeking additional information about our Services.

5. Our storage of your Personal Information

NKSFB uses reasonable and appropriate measures to protect your Personal Information from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into due account the risks involved in the processing undertaken and the nature of the Personal Information we collect.

We will keep your Personal Information for as long as we need it, or as otherwise prescribed by law, for the purposes set out above. This period will vary depending on your interactions with us. We may also keep a record of correspondence with you (for example if you have made a complaint about a product) for as long as is necessary to protect us from a legal claim.

6. Access to other websites

Our Site may include links to and from other websites of affiliates or other unaffiliated third parties. If you follow a link to any of these websites, please note that these websites are not covered by this Privacy Policy. We are not responsible for the privacy practices of any third parties or the content of linked sites although we do encourage you to read the applicable privacy policies and terms and conditions of such parties or websites. This Privacy Policy only applies to how NKSFB deals with your Personal Information, and it does not apply to any other company or any other company's websites even if you access them via our Site. Please check those websites' policies before you submit any Personal Information to them.

7. Protecting children's privacy

We are strongly committed to protecting the safety and privacy of children who visit our Site. Our Site is not designed nor is it intended to be used by children under 13, and we do not knowingly collect personal information online from children under 13 and have adopted techniques to ensure compliance with this Privacy Policy and the Children's Online Privacy Protection Act of 1998 ("COPPA"). Our Site includes content that we believe to be unsuitable for children under 13, and we encourage all parents to talk to their children about online safety and to monitor their children's use of the Internet.

8. Additional Policies In Compliance with the CCPA

The CCPA affords California consumers the rights with respect to their Personal Information set forth in this section.

8.1 Right to Know About Personal Information Collected, Used, Disclosed, or Sold

California consumers have the right to request that NKSFB disclose what personal information it has collected, used, disclosed, and sold over the 12-month period preceding NKSFB's receipt of such a request. To exercise this right, a California consumer must submit to NKSFB a verifiable request to know such information. This request can be submitted by following the procedures set forth in Section 8.4 below.



8.2 **Right to Request Deletion of Personal Information**

California consumers have the right to request the deletion of their personal information collected or maintained by NKSFB. To exercise this right, a California consumer must submit to NKSFB a verifiable request to delete such information. This request can be submitted by following the procedures set forth in Section 8.4 below.

8.3 **Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights**

California consumers have the right to not be discriminated against because the consumer exercised any of the consumer's rights under the CCPA. That means that a company may not deny goods or services to the consumer, charge different rates for goods or services, or provide a different level or quality of goods or services if the consumer chooses to exercise their rights under the CCPA (unless the different rate or different level or quality is reasonably related to the value to the business of the consumer's data).

8.4 **Submitting a CCPA Data Request**

To submit a request to know about the Personal Information we collect about you as described in Section 8.1 or a request for deletion of your Personal Information as described in Section 8.2, please contact us by calling this toll free number (877)-277-4657 or by emailing us at ConsumerRequest@nksfb.com.

NKSFB is required to verify the identity of the individual requesting access to a consumer's data or requesting deletion of a consumer's data. To verify your identity, we will rely upon information we have previously collected about you, such as phone calls received from a known phone number or emails received from a known email. We will also rely upon our personal relationship with our clients to verify the identity of a requester.

If the California consumer submitting a request is not a NKSFB client, such an individual who requested information through our website or a phone call to our "contact us" number, then we will verify identify by confirmation using the information we collected, such as phone number of email address.

8.5 **Authorized Agent**

California consumers may designate an authorized agent to exercise a CCPA right on the consumer's behalf. If a consumer utilizes an authorized agent to exercise a CCPA right, the following proof that the agent has been authorized to act on the consumer's behalf will need to be provided:

- Proof of written permission by the consumer for the authorized agent to act on his or her behalf and separate verification of the consumer; or



- Proof that the authorized agent holds a power of attorney to act on the consumer’s behalf pursuant to Cal. Probate Code §§ 4000-4465.

8.6 Exclusion for Business to Business Information

The rights set forth in this section do not apply to personal information reflecting a written or verbal communication or a transaction between NKSFB and the consumer, where the consumer is a natural person who is acting as an employee, owner, director, officer, or contractor of a company, partnership, sole proprietorship, nonprofit, or government agency and whose communications or transaction with NKSFB occur solely within the context of the NKSFB conducting due diligence regarding, or providing or receiving a product or service to or from such company, partnership, sole proprietorship, nonprofit or government agency.

8.7 Exclusion for Financial Sector Data

Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA) **are not subject** to the CCPA. With respect to such information consumers do not have the enumerated rights under the CCPA set forth in this section.

9. Additional Policies In Compliance with the EEA Privacy Laws

In addition to the other policies described in this Privacy Policy, residents of the European Union or the EEA are afforded the following additional rights and protections as required by the General Data Privacy Regulation (“GDPR”). The additional rights and protections set forth in this section of this Policy apply only to residents of the European Union or the EEA.

9.1 GDPR Definitions

The following additional definitions apply to this Section of the Privacy Policy:

“**Controller**” means NKSFB which is the organization that determines the purposes for which, and the manner in which, any Personal Information is Processed and used in its business.

“**Processor**” means any Person Processing Personal Information.

“**Person**” means a natural person, corporation, association, organization, partnership, or other legal entity.

“**Processing**” is any activity that involves use of the Personal Information. It includes, without limitation, obtaining, recording or holding the Personal Information, or carrying out any operation or set of operations on the Personal Information including organizing, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring Personal Information to third parties.

9.2 **The legal basis for processing your Personal Information**

In order to comply with the GDPR, we are required to set out the legal basis for the processing of your Personal Information. In accordance with the purposes for which we collect and use your Personal Information, as set out above, the legal basis for processing your Personal Information will typically be one of the following:

- our own legitimate business interests, or the legitimate business interests of our third party partners, promoters, affiliates, distributors, suppliers, vendors, and subcontractors, such as, for example, providing direct marketing to our customers of our products and services that we think would be of interest, permitting prospective employees to search and apply for job opportunities, handling inquiries from our promoters, affiliates, distributors, vendors, and customers, or other instances where we have carried out a legitimate interests assessment and have established an existing legitimate interest;
- the performance of a contract that we have in place with you;
- your consent where appropriate; or
- compliance with our legal obligations, including to meet national security or law enforcement requirements.

9.3 **Where we store your Personal Information**

The data that we collect from you is stored on our servers or on servers provided by cloud service providers. By submitting your Personal Information, you agree to this transfer, storing, and processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your Personal Information, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

9.4 **Addendum to how long we store your Personal Information**

In some cases, there is a legal requirement to keep Personal Information for a minimum period of time. Except in those circumstances, we do not keep your Personal Information for any longer than is necessary for the purposes for which the Personal Information was collected or for which it is to be further processed.

9.5 **Your rights with respect to your Personal Information**

Subject to certain exceptions, you have the following rights with respect to your Personal Information:



- To receive or access a copy of the Personal Information that we hold about you;
- To request that any inaccurate or incomplete Personal Information be corrected or supplemented;
- To have your Personal Information erased, unless we have a legitimate reason to retain the Personal Information (such as if we are required to do so for legal reasons); and
- To ask us not to process your Personal Information for a particular purpose, including for marketing.

All of these rights are subject to certain conditions and exemptions. For example, NKSFB will not be obligated to erase your Personal Information if we need to retain it to protect ourselves in the event of a legal claim.

To exercise any of these rights, please submit a written request to us using the contact information set forth [below](#). NKSFB reserves the right to charge a fee in dealing with such a request as permitted by applicable law and regulations. You may also opt out of receiving additional marketing information by using the unsubscribe feature in any marketing email we send you.

10. Conditions of use and changes to our privacy policy

If you choose to receive our Services or visit our Site, any dispute over privacy is subject to this Privacy Policy and our Terms of Use, including limitations on damages, resolution of disputes, and application of the law of the State of California. If you have any concern about our privacy practices, please contact us with a thorough description, and we will try to resolve it. As our business changes, our Privacy Policy and Terms of Use may change also. We may e-mail periodic reminders of our notices and conditions, but you should check our Site frequently to see recent changes. Unless stated otherwise, our current Privacy Policy applies to all information that we have about you and your account.

11. Contacting us

This Site is owned and operated by NKSFB. If you have any questions or suggestions with respect to this Privacy Policy or our privacy practices, please e-mail us at ConsumerRequest@nksfb.com or you can contact us by mail or telephone at:

10960 Wilshire Blvd., 5th Floor
Los Angeles, CA 90024
(877) 277-4657

CCPA-Specific Requests

Please submit CCPA-specific data requests through the procedures set forth in [Section 8](#).



GDPR-Specific Requests

For residents of the EEA, please e-mail us at ConsumerRequest@nksfb.com or contact us by mail or telephone at:

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