

Privacy Notice – California Privacy Schedule

This California Privacy Schedule supplements our General Privacy Notice and applies to California residents where the California Consumer Privacy Act, as amended by the California Privacy Rights Act – together, the CCPA – applies to our processing of personal information.

This Privacy Schedule is intended to provide additional California-specific disclosures, including a notice at collection, and should be read together with our General Privacy Notice.

For the purposes of this Privacy Schedule, “**personal information**”, “**sensitive personal information**”, “**sell**”, “**share**”, “**service provider**” and “**contractor**” have the meanings given under the CCPA.

Otherwise, unless defined herein, capitalised terms in this Privacy Schedule shall be as defined in our General Privacy Notice. In particular, “**Agency**” and “**Agency Group**” refer to the specific agency, legal entity or group of entities responsible for the relevant processing, as described in the General Privacy Notice.

1. Who this Privacy Schedule applies to

This Privacy Schedule applies to California residents whose personal information we process, including:

- visitors to our website;
- clients, prospective clients, suppliers, prospective suppliers, business partners and their representatives;
- event attendees and prospective event attendees;
- business contacts and prospective business contacts; and
- individuals who communicate with us or interact with us in a business context.

This Privacy Schedule does not apply to personnel, employee or candidate data unless expressly stated or required by applicable law.

2. Categories of personal information we collect

We may collect the following categories of personal information:

CCPA category	Examples	Collected?
Identifiers	Name, business email address, telephone number, employer, job title, business address, IP address, online identifiers	Yes
Personal information	Business contact details, financial or transaction information, payment/invoicing details	Yes
Commercial information	Records of services provided or received, event attendance, business relationship information, purchase or transaction records	Yes
Internet or electronic network activity information	Website usage, cookie data, browsing interactions, device/browser information, analytics data	Yes
Geolocation data	Approximate location inferred from IP address	Limited
Professional or employment-related information	Employer, job title, professional role, business contact details, work history where provided in a business context	Yes

Inferences	Business interests, preferences, event interests, marketing preferences and relationship management notes	Yes
Sensitive personal information	Account log-in details, government ID, financial account information or precise geolocation only where relevant and necessary	Not usually / limited where required

We do not knowingly, deliberately collect personal information from children under 16.

3. Sources of personal information

We may collect personal information from:

- you directly;
- your employer or organisation;
- Agency Group companies and The Independents Group companies;
- clients, suppliers, event partners and business partners;
- publicly available sources, such as LinkedIn, professional directories, press sources, public registers and company websites;
- cookies, analytics tools and website technologies;
- service providers and contractors; and
- compliance screening providers and professional advisers.

4. Purposes for which we collect and use personal information

We collect and use personal information for the purposes described in our General Privacy Notice, including:

- managing business relationships;
- communicating with you;
- providing or receiving services;
- administering contracts, projects, procurement, invoicing and accounts;
- organising and managing events;
- sending business updates, invitations and marketing communications;
- website operation, analytics, security and improvement;
- compliance, sanctions, anti-bribery, KYC and onboarding checks;
- internal reporting, group administration and business operations;
- protecting our business, systems, staff, clients and partners;
- corporate transactions, integrations, mergers, acquisitions, reorganisations or asset sales; and
- complying with legal and regulatory obligations.

5. Disclosure of personal information

We may disclose personal information to the following categories of recipients:

Category of recipient	Purpose of disclosure
Agency Group companies and The Independents Group companies	Group administration, reporting, business operations, relationship management and service delivery
Service providers and contractors	IT, hosting, CRM, communications, marketing, event administration, analytics, compliance screening and business support

Professional advisers	Legal, audit, accounting, insurance, banking and consultancy services
Clients, suppliers, event partners and business partners	Business relationship management, service delivery, project administration and event administration
Regulators, authorities, courts and law enforcement	Compliance with legal obligations, regulatory requirements and protection of rights
Corporate transaction parties	Mergers, acquisitions, reorganisations, investments, integrations, financing transactions or asset sales

6. Categories of personal information disclosed for business purposes

In the preceding 12 months, we may have disclosed the following categories of personal information for business purposes:

- identifiers;
- personal information described in Cal. Civ. Code §1798.80;
- commercial information;
- internet or electronic network activity information;
- approximate geolocation data;
- professional or employment-related information;
- inferences; and
- sensitive personal information, only where relevant and necessary.

7. Sale, sharing and targeted advertising

We do not sell personal information for monetary consideration.

However, under California law, “sale” and “sharing” can include certain disclosures of personal information to third parties through cookies, pixels, analytics, advertising or similar technologies, even where no money is exchanged. Where applicable, certain cookie, pixel, analytics, advertising or similar technologies may be considered a “sale” or “sharing” of personal information under California law, even where no money is exchanged.

Where applicable, we may “share” or “sell” the following categories of personal information for cross-context behavioural advertising, analytics or similar purposes:

Category of personal information	Categories of third parties	Purpose
Identifiers, such as IP address, cookie IDs or online identifiers	Analytics, advertising or marketing technology providers	Analytics, marketing measurement, advertising and website optimisation
Internet or electronic network activity information	Analytics, advertising or marketing technology providers	Website analytics, marketing measurement and advertising
Inferences, such as business interests or marketing preferences	Analytics, advertising or marketing technology providers	Marketing, audience insights and business development

You may opt out of sale or sharing by:

- using our cookie consent tool; or
- contacting us at DPO@the-independents.com.

8. Sensitive personal information

We do not use or disclose sensitive personal information for purposes that require a right to limit under the CCPA, unless we provide you with a right to limit such use or disclosure.

Where we collect sensitive personal information, we do so only as reasonably necessary for permitted business purposes, such as security, compliance, account administration, legal obligations or provision of requested services.

9. Retention

We retain personal information only for as long as reasonably necessary for the purposes for which it was collected, including for legal, regulatory, tax, accounting, audit, reporting, security, compliance, corporate recordkeeping or dispute purposes.

In general:

Type of personal information	Indicative retention approach
Business contact and relationship management data	Retained for the duration of our relationship with you or your organisation and for a reasonable period afterwards for business administration, relationship management and legal purposes
Contract, project, procurement, invoicing and account records	Retained for the duration of the relevant relationship, contract or project and typically for 6–7 years afterwards, unless a longer period is required by law
Marketing contact data	Retained until you unsubscribe, opt out or object, after which we may retain limited suppression details to ensure that we respect your preferences
Event attendance and preference data	Retained for as long as necessary for event administration, relationship management and marketing purposes, unless you opt out earlier
Website analytics and cookie data	Retained for the periods described in our Cookies Policy or cookie consent tool
Compliance, sanctions, KYC and due diligence records	Retained for as long as necessary to satisfy legal, regulatory, audit, compliance and risk management requirements
Complaints, disputes and legal claims records	Retained for the duration of the matter and for such period afterwards as necessary to protect our legal rights and comply with applicable limitation periods

Further details are set out in our Data Retention Policy, available on request.

10. Your California privacy rights

Subject to applicable law, California residents may have the right to:

- know/access the personal information we collect, use, disclose, sell or share;
- request a copy of specific pieces of personal information;
- request correction of inaccurate personal information;
- request deletion of personal information;
- obtain a portable copy of personal information;
- opt out of sale or sharing of personal information;
- limit certain uses and disclosures of sensitive personal information, where applicable; and
- not be discriminated against for exercising CCPA rights.

11. How to exercise your rights

To exercise your California privacy rights, please contact us at: DPO@the-independents.com

Where available, you may also use any privacy request form, cookie consent tool or opt-out link made available on the relevant Agency website.

We may need to verify your identity before responding to your request. The information required for verification may depend on the nature of your request and your relationship with us.

12. Authorised agents

You may use an authorised agent to submit a privacy rights request on your behalf.

We may require the authorised agent to provide proof that you authorised them to act on your behalf. We may also require you to verify your identity directly with us or confirm that you provided the authorised agent with permission to submit the request.

13. Non-discrimination

We will not discriminate against you for exercising your rights under the CCPA.

14. Financial incentives

We do not offer financial incentives or price or service differences in exchange for the collection, retention, sale or sharing of personal information, unless we provide you with separate notice as required by applicable law.

15. California “Shine the Light”

California residents may request information about certain disclosures of personal information to third parties for their own direct marketing purposes, where applicable.

To make such a request, please contact: DPO@the-independents.com

16. Contact

If you have questions about this Privacy Schedule or our privacy practices, please contact: DPO@the-independents.com

17. Updates

We may update this Privacy Schedule from time to time. The latest version will be made available on the relevant Agency website or otherwise provided as required by applicable law.

Updated: April 2026