

FOCUS FINANCIAL PARTNERS PRIVACY POLICY

Effective: March 20, 2020

1. Objective

This privacy policy (the “*Privacy Policy*”) explains how Focus Financial Partners (“*Focus,*” “*we,*” or “*us*”) collects, uses, shares and retains information about you when you interact with us or with one of our subsidiaries, including our Partner Firms (our “*Affiliates*”), access or use our website or engage with us on social media. Please note, this Privacy Policy is intended only for a United States audience.

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of the Privacy Policy and, in some cases, we may provide additional notice (such as adding a statement to our website homepage). We encourage you to access and review the Privacy Policy to stay informed about our information practices and the choices available to you.

2. Collection of Information

We are committed to obtaining information about you through lawful and transparent means, with your explicit consent where required.

(a) Information you provide to us – when you engage with Focus to apply for a job or otherwise, we may ask you to provide your name, email address and other personal information you choose to provide.

(b) Information we collect for everyday business purposes – we collect client billing and payment information from Affiliates.

(c) Information we collect when you access our websites and our social media:

(i) Log information – we collect information related to your access to and use of our websites, including the type of browser you use, app version, access times, pages viewed, your IP address, and the page you visited before navigating to our websites.

(ii) Device information – we collect information about the computer or mobile device you use to access our websites, including the hardware model, operating system and version, unique device identifiers, and mobile network information.

(iii) Information collected by cookies and similar tracking technologies – we (and our service providers) use different technologies to collect information, including cookies and web beacons. Cookies are small data files stored on your hard drive or in device memory that help us improve your experience, see which areas

and features of our websites are popular, and count visits. For more information about cookies and how to disable them, please review the information in the **Your Choices** section below.

(d) Information we collect from other sources – we may also obtain information about you from other sources. For example, we may collect information about you from third parties, including background check providers, credit bureaus, and publicly available sources.

3. Use of Information

We are committed to collecting and processing your data for the following purposes:

(a) To communicate with you about Focus and our Affiliates and provide news and information we think will be of interest to you;

(b) For business uses, including for accounting, auditing and reporting purposes and to perform billing and performance analytics;

(c) To monitor and analyze trends, usage, and activities in connection with the Services;

(d) To detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and protect the rights and property of Focus and others;

(e) To debug and to identify and repair errors that impair existing intended functionality; and

(f) To carry out any other purpose described to you at the time the information was collected.

4. Sharing of Information

We may share information about you as follows or as otherwise described in this Privacy Policy:

(a) With vendors, service providers, and consultants that perform services for us, including accountants, tax planners, and attorneys;

(b) In response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law or legal process, including lawful requests by public authorities to meet national security or law enforcement requirements;

(c) If we believe you have violated the law, or to protect the rights, property, and safety of Focus or others;

(d) In connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of another business by Focus or one of our affiliates;

- (e) Between and among Focus and our Affiliates; and
- (f) With your consent or at your direction.

We may also share aggregated or de-identified information that cannot reasonably be used by those third parties to identify you.

5. Retention of Information

We may store the information we collect on you for as long as is necessary for the purpose(s) for which we originally collected it, or for other legitimate business purposes, including to meet our legal or other obligations.

6. Social Sharing Features

Our website and use of social media may offer social sharing features and other integrated tools (such as the LinkedIn “Follow” button), which let you share the actions you take on our website (such as choosing to “Follow” Focus) with other media, and vice versa. Your use of such social sharing features enables the sharing of information with your friends or the public, depending on the settings you establish with the entity that provides the social sharing feature. For more information about the purpose and scope of data collection and processing in connection with social sharing features, please visit the privacy policies of the entities that provide these features.

7. Advertising and Analytics Services Provided by Others

We may allow others to provide analytics services and serve advertisements on our behalf across the web and in mobile applications. These entities may use cookies, web beacons, device identifiers and other technologies to collect information about your use of the Services and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in apps, links clicked, and conversion information. This information may be used by Focus and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests in our Services, and better understand your online activity.

8. Your Choices

(a) Cookies– most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies, this may affect the availability and functionality of the Services.

(b) Mobile Push Notifications/Alerts – with your consent, we may send promotional and non-promotional push notifications or alerts to your mobile device. You can deactivate these messages at any time by changing the notification settings on your mobile device.

9. Jurisdictional Scope

Our website and use of social media is not intended for access or use by any person or entity in any jurisdiction or country where such access or use would be contrary to laws or regulations or which would subject us to any requirement within such jurisdiction or country.

10. Contact Us

If you have any questions about this Privacy Policy, please contact us at:

Focus Financial Partners, LLC
875 3rd Avenue, 28th Floor
New York, NY 10022
Phone: 646-519-2456