



## Privacy Policy

### Purpose of this Policy

The purpose of this Policy is to provide information about the practices of H. Roske & Associates LLP (collectively, "H. Roske & Associates", "we" or "us") concerning the collection, use and disclosure of personal information.

### Information Collection and Use

H. Roske & Associates LLP is the owner of the information collected on the following sites (collectively, "Our Websites"):

HR-NY.COM

H. Roske & Associates LLP will not sell, rent, share or otherwise use any information collected from visitors to Our Websites except as described in this Policy. This Policy may be updated from time to time and therefore users are urged to consult it during each visit to Our Websites to fully understand the policy then in place.

The information we obtain from users helps us personalize and continually improve the user experience on Our Websites. We may use the information we collect to:

- Administer a user's account with us and customize the services we provide to the user;
- Conduct proactive or predictive analysis of use of Our Websites to identify patterns for purposes of improving the user experience;
- Send users service or promotional communications through email, SMS, or other means.

### Personal Information Collected

At any time, users may visit public portions Our Websites without signing onto an account, identifying themselves or revealing any personal information. Users who do not sign on to Our Websites are considered to be "Visitors". Users who are required to enter a user identification and password to gain access to Our Websites are considered to be a "Subscriber" and/or a "Client". Our Websites' servers do not have access to and do not collect, except as specified below, personal information of "Visitors". Visitors, Clients and Subscribers are collectively referred to as "you", "your", "user" or "users" in this Policy.

Our Websites may place cookies on Visitors', Subscribers' and/or Clients' hard drives to collect aggregate generic information concerning the number of visitors to Our Websites and pages viewed as well as affect the manner by which Our Websites are accessed. For "Visitors" this information is used for analysis and control of traffic at Our Websites only. For "Subscribers" and "Clients" this information is also used for identification purposes.

Certain information regarding Visitors', Subscribers' and/or Clients' behavior on Our Websites is automatically collected. This information is used for internal research purposes so that H. Roske & Associates LLP may better understand and serve the needs of both the public and its Clients and Subscribers. Information collected may include the URL address visited immediately prior to Our Websites, the URL visited immediately following Our Websites, the Internet browser type used and IP address Our Websites were accessed from and the particular pages visited at Our



Websites. This data is reviewed and analyzed on a collective basis and is not ordinarily linked to the identity of any individual Visitor. However, depending on the manner by which an IP address is assigned to a user, that IP address may identify a specific Visitor.

Users can use forms at Our Websites in order to contact us. Users have the discretion to include as much or as little personal information as they wish. Whether that information is reviewed or acted upon, in any way, is at the sole discretion of H. Roske & Associates LLP.

There may be times when H. Roske & Associates LLP will require personal information from persons using Our Websites as either Clients or Subscribers. This information is needed to help ensure that only previously authorized individuals access non-public portions of Our Websites for any purpose, including reviewing, updating or adding data or information to our databases or to request certain services.

The following information is not considered personal information for purposes of this Policy: the name, title, business address, telephone number, and/or e-mail address of an employee or partner of any organization.

We do not permit registration by, and will not knowingly collect personally identifiable information from anyone under the age of 13. No parts of Our Websites are structured to attract anyone under the age of 13.

#### **Amendments and Access to Personal Information**

At the request of a Client or a Subscriber, a Client or a Subscriber or its employees and/or officers and/or partners will be given access to that particular Client's or Subscriber's information and will be given an opportunity to amend any inaccuracies. European data protection legislation gives users the right to access and amend information held about users. Any access request may be subject to a nominal fee to meet our costs in providing a user with details of the information we hold about such user. In order to request access and/or an opportunity to amend, please contact:

Henry Roske, Managing Partner  
H. Roske & Associates LLP  
350 Fifth Avenue, STE 5220  
New York, NY 10118 USA

[privacy@hr-ny.com](mailto:privacy@hr-ny.com)

#### **Cookies**

Our Websites use cookies. By using Our Websites and agreeing to this Policy, users consent to H. Roske & Associates LLP's use of cookies in accordance with the terms of this Policy. A cookie is a piece of data sent from a website to a



user's Internet browser and stored on the user's hard drive for future reference. Our Websites may use cookies to store information previously provided by users, so that they do not need to re-enter the information during each visit to Our Websites.

Some Internet browsers allow a user to decide whether or not to accept cookies. Moreover, some programs may notify you when a website is about to deposit cookie data on your hard drive. If you decide not to accept cookies, you may not be able to successfully navigate some portions of a website or may navigate with some redundancy. These conditions may or may not apply to Our Websites. If a user rejects the cookie, he or she may still use Our Websites, but the visit may not be optimal.

### **Sharing of Information**

H. Roske & Associates LLP will send personally identifiable information about Clients and/or Subscribers to other companies or people when at least one of the following conditions is met:

- When H. Roske & Associates LLP needs to share a Client's or Subscriber's information to provide the product or service the Client and/or Subscriber has requested. For example, when registering a Domain Name, certain information regarding the registering party must be available to other registrars and to the public.
- When H. Roske & Associates LLP responds to subpoenas, court orders or legal process or requests from law enforcement officials, national security officials, or for the maintenance of historical records. H. Roske & Associates LLP will disclose personal information when it believes it is appropriate to do so to comply with law.
- H. Roske & Associates LLP will disclose personal information when it believes it is appropriate to do so to protect the rights, property, or safety of H. Roske & Associates LLP or other persons or of other Clients or the Subscribers of H. Roske & Associates LLP whether or not they access Our Websites.
- When H. Roske & Associates LLP has a Client's or Subscriber's oral or written consent to share the information. H. Roske & Associates LLP may seek a Client's or Subscriber's consent to disclose information for other purposes than described in this statement in the future.

### **Links**

Our Websites include links to other websites owned and operated by third parties. These links are not endorsements or recommendations. H. Roske & Associates LLP has no control over the content of third party websites and H. Roske & Associates LLP accepts no responsibility for such sites, for the privacy practices of such sites, for the way such sites manage personal information or for any loss or damage that may arise out of a user's use or access of such sites. H. Roske & Associates LLP encourages its Visitors, Clients and Subscribers to be aware when they leave Our Websites and to read the privacy statements of every web site that collects personally identifiable information.

### **Cross-border Data Transfers**

Information that H. Roske & Associates LLP collects may be stored and processed in and transferred between any of the countries in which H. Roske & Associates LLP operates to enable the use of the information in accordance with this Policy. Users agree to such cross-border transfers of personal information.



## **Where We Store Personal Data**

The data that we collect from users may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA. By submitting their personal data, users agree to this transfer, storing or processing. H. Roske & Associates LLP will take all steps reasonably necessary to ensure that users' data is treated securely and in accordance with this Policy. Unfortunately, the transmission of information via the Internet is not completely secure. Although H. Roske & Associates LLP will do its best to protect users' personal data, we cannot guarantee the security of such data transmitted to Our Websites. Any transmission is at a users' own risk. Once H. Roske & Associates LLP has received personal information, we will use certain procedures and security features in an effort to prevent unauthorized access.

## **Security/Control of Client and Subscriber Information**

Client and Subscriber information on Our Websites is password protected for privacy and security reasons. If H. Roske & Associates LLP's services are no longer desired, a Client and/or a Subscriber should contact H. Roske & Associates LLP at the address above to so advise us.

Clients and Subscribers should always protect against unauthorized access to their computers and passwords. H. Roske & Associates LLP is not responsible for any disclosure of information available on Our Websites, be it confidential or otherwise, resulting from a Client and/or a Subscriber failing to take adequate precautions to prevent unauthorized access.

When H. Roske & Associates LLP supplies or requests Client and/or Subscriber sensitive or confidential information to or from its Clients and/or Subscribers via the Internet, that information is SSL encrypted by Verisign's 40-bit (or greater) secure server software so that it is reasonably protected from interception and hacking as it travels over the Internet.

## **Viruses, Hacking and Other Offenses**

You must not misuse Our Websites by knowingly introducing viruses, trojans, worms, logic bombs or other material which is malicious or technologically harmful. You must not attempt to gain unauthorized access to Our Websites, the server(s) on which Our Websites are stored or any server, computer or database connected to Our Websites. You must not attack Our Websites via a denial-of-service attack or a distributed denial-of-service attack. By breaching this provision, you may commit a criminal offense under the Computer Misuse Act 1990 and other relevant laws in various jurisdictions. We will report any such breach to the relevant Law Enforcement Authorities and we will cooperate with those Authorities by disclosing your identity to them. In the event of such a breach, your right to use Our Websites will cease immediately. We will not be liable for any loss or damage caused by a disputed denial-of-service attack, viruses or other technologically harmful material that may infect your computer equipment, computer programs, data or other proprietary material due to your use of Our Websites or to your downloading of any material posted on or within Our Websites, or on any website linked to Our Websites.

## **Business Transfers**

In the event that H. Roske & Associates LLP transfers some or all of its assets, or one of H. Roske & Associates LLP's business units is acquired, Client and/or Subscriber information will likely be included in the transfer. By using Our



Websites and providing information to us, you consent to such transfer.

## **Compliance**

H. Roske & Associates LLP has appointed an individual with responsibility for ensuring H. Roske & Associates LLP's compliance with its current and future privacy obligations. That person can be reached by sending a facsimile to:

H. Roske & Associates LLP  
Attn: Henry Roske, Privacy Compliance Officer  
Tel 212-584-4230  
Fax 212-584-4233

## **Notification regarding Changes; Conditions of Use**

H. Roske & Associates LLP may change, amend, or update this Policy upon prior notice posted on Our Websites. Clients and Subscribers as well as other users should consult this Policy at the very beginning of each visit to Our Websites. If H. Roske & Associates LLP makes any changes to this Policy that may substantially affect the use of its Clients' and/or Subscribers' personal information, it will notify its Client and Subscribers via a posting on Our Websites or through other means reasonably calculated to so advise its Clients and/or Subscribers. If a Client and/or Subscriber does not agree with the changes, amendments, or updates, he or she may request that access to Client and/or Subscriber information via the Internet be terminated as described above. If a Visitor, Client and/or Subscriber chooses to visit Our Websites, his or her visit and any dispute over privacy is governed by this Notice and the Conditions of Use.