

## U.S. States Privacy Policy

Last Updated Date: January 1, 2023

This U.S. States Privacy Policy should be considered an addendum to the Booz Allen Privacy Statement that applies to California and Virginia residents. This policy explains the Personal Data that we collect from these residents and how we collect and use the Personal Data pursuant to the California Consumer Privacy Act (CCPA) and its regulations and the Virginia Consumer Data Protection Act (VCDPA) and its regulations.

This U.S. States Privacy Policy provides additional details regarding the categories of Personal Data about California and Virginia residents that we have collected or disclosed within the preceding 12 months. This policy also provides details about the rights that California and Virginia residents have related to the collection of their Personal Data under their states' privacy laws. This policy should be read in conjunction with the Booz Allen Privacy Statement, and in any case of conflict, this policy regarding Personal Data subject to your state's law will prevail.

For purposes of this notice, "Personal Data" includes all "Personal Information" or "Personal Data" as that term is defined in the CCPA or VCDPA. "Sensitive Personal Data" includes all "Sensitive Personal Information" or "Sensitive Data" as that term is defined in the applicable state laws (California or Virginia). Targeted advertising and cross-context behavioral advertising are interchangeable.

### Sources of, purposes for collecting, and categories of personal data collected and disclosed

Booz Allen's Privacy Statement provides a detailed description of the specific elements and categories of Personal Data and Sensitive Personal Data that we collect, the categories of sources from which we collect the Personal Data and Sensitive Personal Data, and the categories of third parties with whom we share or may share Personal Data or Sensitive Personal Data.

### Categories of Personal Data

In the preceding twelve (12) months we collected the following categories of Personal Data and Sensitive Personal Data from California and Virginia residents. The following list represents categories of Personal Data and Sensitive Personal Data across all residents and may not represent what we have collected specifically about you.

**Please Note:** Your state law may not require the disclosure of data that is publicly available or that has been aggregated or de-identified.

- Identifiers, including name, postal address, email address, account name, IP address, driver's license number and similar identifiers

- Personal information as defined in Cal. Civ. Code § 1798.80 (e), including similar identifiers as described above but also information, such as insurance policy number, employment history, health information, health insurance information, credit card history, debit card number, passport number
- Protected classifications, including information related to race, ethnicity, national origin, religion, marital status, gender, or union membership
- Commercial information, including records of personal property, products or services purchased, or other consumer history or tendencies
- Biometric information, including fingerprints, facial images, or other physical or behavioral characteristics used to identify an individual
- Internet or other electronic network activity, such as browsing history, search history, and interaction with a website
- Geolocation data, including precise physical location through an address or internet connected device
- Sensory information, including thermal information
- Professional or employment-related information, including resumes, job history, and referrals
- Education information, including non-public information as defined by the Family Educational Rights and Privacy Act (20 U.S.C. § 1232g, 34 C.F.R. Part 99)
- Contents of communications
- Inferences drawn from any of the Personal Data or Sensitive Personal Data to create a profile about the individual reflecting preferences, characteristics, psychological trends, pre-dispositions, behavior, attitudes, intelligence, abilities, and aptitudes

### Sensitive Personal Data

Some of the above listed Personal Data may be considered Sensitive Personal Data under your state privacy laws, such as protected classifications, biometric data when used to identify you, sexual orientation, national origin, citizenship/immigration status, religion, medical or health information, and precise geolocation. California also consider social security number, passport number, trade union membership, and driver's license number sensitive Personal Data.

### Purposes of Collection and Processing

In the preceding 12 months, Booz Allen may have collected and processed Personal Data and Sensitive Personal Data for various business purposes, including:

- Employment purposes
- Auditing purposes
- Detecting and mitigating security incidents
- Protecting against potential threats to Booz Allen
- Protecting against fraudulent or illegal activity
- Debugging to identify and repair errors that impair existing intended functionality

- Short-term, transient uses where the Personal Data is not disclosed to another third party and is not used to build a profile about a consumer or otherwise alter an individual consumer's experience
- Performing services for or on behalf of our clients, including, but not limited to, maintaining accounts, providing customer service, processing payments, providing analytics
- Providing advertising and marketing services other than cross-context behavioral advertising or targeted advertising
- Undertaking internal research for development of commercial products or demonstrations where the Personal Data is not used in an identifiable manner in the commercial product
- Undertaking activities to verify or maintain the quality or safety of our services and to improve, upgrade, or enhance our services
- Exercise and defend legal claims

### Disclosure of Personal Data or Sensitive Personal Data

In the preceding 12 months, Booz Allen may have disclosed to third parties for a business purpose the categories of Personal Data and Sensitive Personal Data listed above. Booz Allen may have disclosed this Personal Data and Sensitive Personal Data to the following categories of third parties:

- Other Booz Allen affiliates and subsidiaries for Booz Allen's operational purposes
- Vendors, suppliers, and subcontractors who provide services on our behalf or on behalf of a client
- Professional service organizations, such as auditors, law firms, consultants, and accountants to receive services from these organizations
- Insurers or financial firms to receive services from these organizations
- Joint marketing partners and ad networks to marketing purposes both online and offline (see *Sharing with Third Parties for Cross-Context Behavioral Advertising*)
- Business partners for business development and growth
- Government and commercial clients to perform services for our clients
- Information service providers, such as internet service providers, data analytics providers, operating systems and platforms providers, as necessary to receive services
- Identity and credit verification services as well as employment, criminal and civil, and education verification services to conduct due diligence and manage Booz Allen's responsibilities related to employees and hiring of candidate
- Regulatory, professional bodies, government authorities, and any other oversight entity to comply with legal or other compliance requirements

### Sale and Sharing of Personal Data

Booz Allen has not "sold" Personal Data for monetary consideration. Depending on your state's privacy law, sharing browsing information with certain third parties using cookies, pixels, or

other online tools may be considered a “sale” or “sharing” of Personal Data for targeted advertising or cross-context behavioral advertising and profiling. Booz Allen does not collect Personal Data on its websites for profiling that produces legal or similarly significant effects, such as denial of employment opportunities.

Booz Allen allows third parties to collect your browsing activity and certain other Personal Data through automated technologies on our website. These third parties may collect your Personal Data when you are on our websites and may use your Personal Data for purposes of advertising.

We may share the following Personal Data with third parties through the use of cookies, pixels, and other online tools for the purpose of providing you a more personalized browsing experience and to improve our own advertising efforts by identifying your interests and information you might want to receive.

- Broad geographic location (e.g. country, city-level or zip location)
- Company name
- Internet Protocol (IP) address
- Pixel ID
- Device type
- Browser Type
- How your device interacts with our site, including pages viewed, time you visited, current URL, and links clicked

You can view a list of these third party cookie, pixels, and other online tools here here and opt-out of their use via an opt-out preference signal sent by a platform or other technology or by contacting Booz Allen at [webmaster@bah.com](mailto:webmaster@bah.com) or call 877-927-8278. Please note that to the extent you access Booz Allen across multiple devices or platforms or if you clear your browser settings, you may have to opt-out again.

#### [Opt-Out Preference Signal or Do Not Track Global Privacy Control](#)

If we detect that you have enabled the Do Not Track setting in your browser or another technology (Opt-Out Preference Signal or sometimes called the Global Privacy Control), we will automatically disable advertising cookies. Booz Allen will not charge a fee or change your experience with the products or services offered if you choose to enable an Opt-Out Preference Signal or Global Privacy Control. You may learn how to set the Global Privacy Control at <https://globalprivacycontrol.org/>.

#### [Minors](#)

Booz Allen does not knowingly collect, sell, or share Personal Data of minors under 16 years of age.

## Data Retention

Booz Allen retains PII only as long as needed for the stated processing purpose and follows our record retention schedule. Booz Allen's record retention schedule provides the required retention periods for Booz Allen records based on business and legal requirements, including the need to exercise and defend legal rights. Booz Allen also maintains records for archiving and historical purposes in compliance with retention periods. If Personal Data is not in a record subject to Booz Allen's retention schedule, Booz Allen policy requires that the Personal Data be deleted when no longer necessary for the stated processing purpose.

## Legal Rights

Depending on your states' consumer privacy law, you may have legal rights related to your Personal Data, as indicated below.

### California

You can exercise any of the listed rights using the methods described in Exercising Your Rights below.

*Right of access and data portability:* You may request that Booz Allen disclose to you information about our collection and use of your Personal Data and Sensitive Personal Data in the preceding 12 months, including:

- Categories and specific pieces of Personal Data and Sensitive Personal Data that we collected about a California resident
- Categories of sources from which we collect Personal Data or Sensitive Personal Data
- Business or commercial purpose for which we collect Personal Data or Sensitive Personal Data
- Categories of Personal Data or Sensitive Personal Data that we Share and the categories of third parties with whom we Share the Personal Data or Sensitive Personal Data
- Business or commercial purpose for which we Share Personal Data or Sensitive Personal Data
- Categories of Personal Data or Sensitive Personal Data that we have disclosed for a business purpose
- Length of time, or criteria for determining the length of time, that Booz Allen intends to retain each category of Personal Data and Sensitive Personal Data

*Right to request deletion of Personal Data:* You may request that Booz Allen delete your Personal Data or Sensitive Personal Data. This request is subject to Booz Allen's right to maintain Personal Data and Sensitive Personal Data for purposes permitted under applicable law. If we cannot comply with your request, we will notify you.

*Right to request correction of your Personal Data and Sensitive Personal Data:* You may request that Booz Allen correct inaccurate Personal Data.

*Right to opt-out of a Sale or Sharing of Personal Data for behavioral advertising purposes:* You may request that your Personal Data not be sold or shared for behavioral advertising purposes as indicated above.

*Right to limit the use and disclosure of Sensitive Personal Data:* You may request to direct Booz Allen to limit the use of your Sensitive Personal Data to that which is necessary to perform the services or provide the goods as reasonably expected and to perform certain services permitted by the CCPA. At this time, Booz Allen only uses Sensitive Personal Data for purposes permitted by the CCPA. If this changes, Booz Allen will notify you of the right to limit the use and disclosure of Sensitive Personal Data.

*Right to non-discrimination:* You have the right to exercise any of your rights listed above and any other rights under the CCPA without discrimination by Booz Allen. This includes the right of employees, applicants, and independent contractors not to be retaliated against for the exercise of their CCPA rights.

#### Virginia

You can exercise any of the listed rights using the methods described in Exercising Your Rights below.

*Right of access:* You may request to confirm whether Booz Allen is processing your Personal Data and to access your Personal Data.

*Right of data portability:* You may request that we provide you a copy of the Personal Data that you previously provided to Booz Allen.

*Right to correction:* You may request that we correct inaccuracies in the Personal Data that we have collected about you. This request is subject to Booz Allen's right to maintain Personal Data for purposes permitted under applicable law. If we cannot comply with your request, we will notify you.

*Right to opt-out:* You may request that your Personal Data not be sold to third parties or used for targeted advertising or that your Personal not be used for profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.

*Right to Deletion:* You may request deletion of certain Personal Data that we have collected about you. This request is subject to Booz Allen's right to maintain Personal Data for purposes permitted under applicable law. If we cannot comply with your request, we will notify you.

*Appeal:* You may appeal Booz Allen's denial of any of the above-listed rights. You may do so by following the procedures below on Exercising Your Rights and responding to the message that Booz Allen sends to you denying your request by indicating that you want to appeal.

## Exercising Your Rights

To exercise any of your rights listed above, please contact Booz Allen by:

- Contacting us at [webmaster@bah.com](mailto:webmaster@bah.com) or call 877-927-8278
- Opt-out of sharing your Personal Data by enabling the Preference Signal Opt-Out.

We will not require you to verify your right to opt-out of the sharing of Personal Data. To exercise your other rights, we will require you to provide certain personal data to verify your identity for your protection and as required by California law. This information includes:

- Name
- Email address
- Description of relationship with Booz Allen, the Personal Data for which you are exercising your rights, and additional information as necessary, such as the rights you intend to exercise

You may authorize another person or agent to make the request on your behalf. This person will have to provide the above listed information for both you and the agent.

After verifying your identity and validity of your request, Booz Allen takes the following action free of charge:

- If you request disclosure of the specific information related to you collected, disclosed, or shared, provide you notice of the information directly or indirectly collected by category of information, the categories of sources from which the Personal Data was collected, the business purpose for collecting or sharing the Personal Data, and the categories of third parties to whom the business disclosed the Personal Data
- If you request access, provide you access to any required Personal Data for the twelve (12) month period preceding your request, including providing you an electronic copy to easily transmit your Personal Data to another company (right to data portability), when technically feasible and as required by your state's law
- If you request deletion, delete your Personal Data, subject to the right to maintain data as permitted under law
- If you request correction, correct your Personal Data, subject to the right to disagree as permitted under law
- Respond to your request within forty-five (45) days unless we notify you that we reasonably need to extend that period

## Contact to Report Concerns or Ask Questions

Booz Allen provides employees, clients, and external third parties various means to ask questions or to report unethical or illegal behaviors that violate the law, regulations, or Booz Allen policy. Questions or reports can be made directly to the Ethics team at [ethics@bah.com](mailto:ethics@bah.com),

or via our reporting helpline at <https://speakup.bah.com> or 1-800-501-8755 (U.S.) or 1-888-475-0009 (international).