



Andrea Luehmann, Ltd. Privacy Shield Policy Statement

Intro

Andrea Luehmann, Ltd. adheres to the EU-US Privacy Shield Framework published by the U.S. Department of Commerce. Andrea Luehmann, Ltd. is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC.)

This statement outlines our general policy and practices for implementing the framework of the Privacy Shield Program, including the types of personal data we obtain and manage, how we use it, and how we ensure individuals' ability to appropriately access and correct personal data we have relating to them. If there is any conflict between the Principles and this statement, the Principles will govern. To learn more about the Privacy Shield Program, and to view Andrea Luehmann Ltd.'s certification, please visit www.privacyshield.gov

This policy applies to personal data we handle, which includes information that is transferred from the European Economic Area, Switzerland and the United Kingdom (whether or not in the EEA), to the United States, in reliance on the Privacy Shield Framework and pertains to a specific individual or can be linked directly or indirectly to that individual.

Data Security

We are committed to the consistent application of various physical, electronic and managerial measures to ensure reasonable protection of personal data we have collected. These measures include regular training of staff and review of our data security policies, organized processes of managerial oversight, regular IT and cyber security updates to ensure the security of our network and computers, physical copies of any personal data are kept in a locked safe accessible only to authorized personnel, as well as various other measures to ensure data is protected from loss, misuse, unauthorized access or unauthorized alteration.

We process personal data only for the limited and specific purpose for which we obtained the data. Individuals whose data we have gathered have the right to access the data we have on file to ensure the information gathered is correct or complete. Individuals may amend or request that we destroy personal data we have that relates to them. We processes these requests only when individuals can establish their identity through confirmation of identifying information such as their date of birth or social security number, and when their request in regard to their personal data is lawful and does not violate the privacy of another individual.

We collect personal data of our employees for human resource purposes, and personal data of clients and their personnel for the purpose of rendering professional services to our clients. This data is collected, handled and used only as permitted by the Privacy Shield Program. Data is collected only with consent of the person to whom the data pertains. Consent is obtained and individuals are notified about the personal data we will collect from them via this statement, engagement letters, and personal communication with these individuals.

Disclosing Personal Data

We do not disclose any individual's personal or private data to any third-party, except when officially requested by the individual, required by lawful request from public authorities or required by law, or if the information requested is publically available. Information may be disclosed internally to other employees of Andrea Luehmann Ltd. if the disclosure is consistent with the purpose for which the information was obtained and the employee has completed training on and signed the Privacy Policy.

We may transfer personal data from one jurisdiction to another. Privacy laws vary by jurisdiction, and some may provide less or different legal protections than others. Andrea Luehmann, Ltd. will protect personal data in accordance with the Privacy Shield Program regardless of the jurisdiction in the United States in which the data resides.

Andrea Luehmann, Ltd. is responsible for third party acts within its control that result in the processing of personal data inconsistent with the Privacy Shield Program.

Ongoing Training, Monitoring and Adaptation

Andrea Luehmann, Ltd. is committed to ensuring that all employees of our firm follow a comprehensive, cohesive and Privacy Shield compliant protocol to protect those affected by the personal data we handle. Every year, we review our privacy policy to ensure that our policy is accurate, compliant, and up-to-date in accordance with Privacy Shield's framework, and we offer open discussion among employees to ensure they have the resources and training needed to understand and follow the policy. All employees at this time sign the finalized Privacy Policy to demonstrate that they understand the policy and the purpose of the policy. If revisions or amendments are made to our policy, these are posted publicly on our website, where our Privacy Policy is located.

Complaints and Dispute Resolution

In compliance with the Privacy Shield Principles, Andrea Luehmann, Ltd. commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact Andrea Luehmann, Ltd. at:

Andrea Luehmann, Ltd.
203 N LaSalle St, Ste 2550
Chicago, IL 60601
info@luehmann-chicago.com

Andrea Luehmann, Ltd. has further committed to refer unresolved Privacy Shield complaints to the European data protection agencies (DPAs), an alternative dispute resolution provider. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please visit https://edps.europa.eu/node/75_en for more information or to file a complaint. The services of the European data protection agencies are provided at no cost to you.

Andrea Luehmann, Ltd. commits to cooperate with EU data protection authorities (DPAs) and comply with the advice given by such authorities with regard to human resources data transferred from the EU in the context of the employment relationship

An individual may under certain conditions invoke binding arbitration. Please see www.privacyshield.gov for more information on conditions giving rise to binding arbitration.

About Andrea Luehmann, Ltd.

Andrea Luehmann, Ltd. is a licensed CPA firm providing professional tax, accounting, and auditing services to American subsidiaries of German medium-sized companies for over 30 years. Andrea Luehmann, Ltd. has represented the majority of its clients from their onset in the U.S.

Wir sind eine unabhängige Steuer- und Wirtschaftsprüfungskanzlei und betreuen seit über 30 Jahren hauptsächlich amerikanische Tochtergesellschaften deutscher mittelständischer Unternehmen. Die meisten unserer Mandanten haben wir von der Gründung an vertreten.

This material has been prepared for general information purposes and was not intended or written to be used, and cannot be used, to avoid any government penalties that may be imposed on a taxpayer

March 21, 2022