

Minnesota Privacy Addendum

Effective July 31, 2025

Last updated July 14, 2025

This Minnesota Privacy Addendum (“Addendum”) supplements the Grant Thornton Advisors, LLC (“Grant Thornton,” the “firm” or “we”) Privacy Statement (“Privacy Statement”) and contains disclosures required under the Minnesota Consumer Data Privacy Act (“MNCDPA”) for individuals who are Minnesota residents (“Consumers”).

What is Personal Data

For Minnesota residents, the term “Personal Data” means any information that is linked or reasonably linkable to an identified or identifiable natural person as defined in the MNCDPA. All other capitalized terms have the same meanings as provided in the Grant Thornton Privacy Statement or MNCDPA.

Uses of Your Personal Data

This Addendum provides information about uses of your Personal Data, specifically the: categories processed through the Site and our Services, purposes for processing, categories of third parties to whom such Personal Data categories may have been sold or shared, if applicable, and duration of retention. Grant Thornton does not have actual knowledge that it sells or shares the Personal Data of individuals under 13 years of age.

Personal Data Processing

Personal Data collected about you will vary according to our interactions with you and the products and services we offer, please see the descriptions below for more information.

| Category of Personal Data | Category of source from which data is collected | Purpose of collection | Category of third parties to whom data is potentially disclosed | R |
|---|---|--|---|----------------|
| Personal identifiers: contact information (such as first and last name, e-mail address, mailing address or phone number), and current employer and job title | Directly from consumer; directly or indirectly from our clients or their agents | To respond to requests; to send information about Grant Thornton’s services or events; to send administrative information or notices; to advertise our services on other websites; to communicate in connection with an engagement | Service providers; service providers for marketing services; our affiliates in Bengaluru, India; other member firms of GTIL | Li re ye |

| | | | | |
|--|---|--|---|----------------------------------|
| Education and professional information: name, address and other contact information, work history, educational experience, licenses, and certifications, other professional or employment-related information, full or partial Social Security number, gender, race, ethnicity, citizenship, veteran, and disability status | From consumer | To create an account on Grant Thornton's online job board; to process applications for employment and communicate about employment opportunities; to evaluate information for employment opportunities | Service providers; our affiliates in Bengaluru, India; background check vendors | En er te be be pl |
| Audio, visual: This category would include audio and video recordings and surveillance | From consumer | Employment and security | Service providers for providing audio/visual services; law enforcement authorities | 90 |
| Internet activity: automatically collected information from activity on our Sites such as browser information, IP address, and browser type | Cookies and other tracking technologies | To personalize content on our Sites; to track activity on and technical performance of our Sites; to evaluate our marketing efforts; to improve our Sites | Service providers for providing internet services; service providers for marketing services | O |
| Personal identifiers: personal information collected while providing services and in connection with pre-engagement activities | Directly from consumer; directly or indirectly from our clients or their agents | To fulfill a contract for services; to perform pre-engagement activities; to enforce our rights arising from any contract, including billing and collections | Service providers; our affiliates in Bengaluru, India; other member firms of GTIL | Te re of ye |

Rights

As a Minnesota resident whose Personal Data may be processed by Grant Thornton, you have the right to request, subject to any statutory limitations or exceptions:

- confirmation that the firm is processing your Personal Data
- deletion of your Personal Data
- correction of your Personal Data
- opt-out of Personal Data processed for the purposes of targeted advertising, sale, or Profiling
- copies of Personal Data you have provided to the firm in a portable format
- disclosure of third-party recipients of your Personal Data.

Opt-Out

To the extent our activities could be construed as a sale of Personal Data, you have the right to opt out [here](#). You can also click on the “[Do not sell/share my personal information](#)” link at the bottom of the Site to learn more about exercising this right.

You have the right to opt out of targeted advertising and can do so by clicking on the “Customize cookie settings” button contained within this link: [Customize cookie settings](#).

You may also opt out by broadcasting an Opt-Out Preference Signal, such as the Global Privacy Control (GPC). We honor Opt-Out Preference Signals, including GPC. If you choose to use an Opt-Out Preference Signal, you will need to turn it on for each supported browser or browser extension you use. You can read about our general [cookies use here](#).

Pursuant to the MNCDPA, Consumers can also opt-out of Profiling defined as any form of automated processing performed on Personal Data to evaluate, analyze, or predict personal aspects related to you, as an identified or identifiable Consumer, with respect to the Consumer’s economic situation, health, personal preferences, interests, reliability, behavior, location, or movements where such automated decisions are made in furtherance of decisions that produce legal or similarly significant effects concerning the Consumer. The firm does not conduct such processing.

Your Personal Data may be Shared

To the extent we share Personal Data, you have the right to opt out of the sharing of Personal Data. You can also click on the “[Do not sell/share my personal information](#)” link at the bottom of the Site to learn more about exercising this right.

You may also opt out by broadcasting an Opt-Out Preference Signal, such as the Global Privacy Control (GPC). We honor Opt-Out Preference Signals, including GPC. If you choose to use an Opt-Out Preference Signal, you will need to turn it on for each supported browser or browser extension you use.

You can read more about our general [cookies use here](#)

Authorized Agents

Minnesota Minors and those subject to guardianship or conservatorship may have their legal agents exercise certain rights above on their behalf. We will require proof that such authorized agents or guardians are authorized to act. Please contact us at privacy.questions@us.gt.com for more information about submitting such requests as an Authorized Agent.

How to Submit a Rights Request

To submit a rights request or to have an Authorized Agent make a request on your behalf, please contact us at privacy.questions@us.gt.com, (877) 282-0109, or complete the [web form located here](#).

Verification

We will need to verify your identity to respond to a rights request, except for requests to opt-out of sharing as provided by the MNCDPA. If you have an account with us that is password-protected, we may verify your identity through our existing authentication practices for your account. If you do not have an account with us, we can request from you two or more data points of Personal Data to verify your identity depending on the nature of the request. Where you request specific pieces of Personal Data, we may also request a signed declaration under penalty of perjury to attest to/verify your identity.

Responses to Requests

Grant Thornton will respond to requests as required by applicable law consistent with statutory requirements. Pursuant to the MNCDPA, you may exercise your rights up to two times per year without charge. In the case of a request to delete Personal Data, we may use a two-step process for online requests to delete where you must first, submit the request to delete and then second, and separately confirm that you want your Personal Data deleted.

Minnesota laws does not permit the following Personal Data about a Consumer to be disclosed, but instead a confirmation of collection consistent with the MNCDPA: social security number, driver's license or other government-issued identification number, financial account number, health insurance account number of medical identification number, account password, security questions or answers, Biometric Data.

We reserve the right to deny a request in the following circumstances and where otherwise indicated by Minnesota law. You will be notified where we decline to act on your request.

- agent authorization is not verifiable
- your identity cannot be verified according to the level required.

Appeal Process

If your request is denied, please send us an email to privacy.questions@us.gt.com with the Subject Line "Appeal Minnesota" and attach the communication from Us explaining why we were unable to fulfill your request as well as your response to the reason we provided for not fulfilling your request. We will respond within sixty (60) days of receipt of your appeal. You may contact the Minnesota Attorney General through its website Attorney General's Office regarding any complaints you may have with respect to the exercise of your rights.

No Discrimination

Grant Thornton will not discriminate against you in the event you exercise any of the rights under Minnesota privacy law. Specifically, we will not:

- deny services to you
- charge different fees or rates for services, including using discounts or other benefits or imposing penalties
- provide a different level or quality of services to you
- suggest that you will receive different rates for services or services at a different level or quality.

Accessible Format

This Addendum is available to individuals with disabilities. To access this Addendum in an alternative downloadable format, please [click here](#).

Do Not Track Signals

Some web browsers incorporate a “do-not-track” or similar feature that signals to websites with which the browser communicates that a visitor does not want to have their online activity tracked. If you have enabled a legally recognized browser-based opt out preference signal (e.g. Global Privacy Control) on your browser, Grant Thornton will recognize this preference according to and to the extent required by applicable law.

Enforcement and Dispute Resolution

We will investigate and attempt to resolve complaints and disputes regarding our use and disclosure of Personal Data in accordance with this Addendum. We encourage interested persons to raise any concerns with us using the contact information below. Any employee who we determine is in violation of our privacy policies will be subject to our disciplinary process. For more information about how Minnesota residents may file a complaint with the [Minnesota Attorney General's office](https://www.ag.state.mn.us/Office/Complaint.asp) at <https://www.ag.state.mn.us/Office/Complaint.asp>.

Merger, Change in Ownership and Other Business Transitions

In the event Grant Thornton goes through a business transition, such as a merger, or the acquisition or sale of all or a portion of its assets, your Personal Data may be among the assets transferred.

Addendum or Privacy Statement Changes

Grant Thornton reserves the right to amend or modify this Addendum or the Privacy Statement from time to time. We will post any revised Addendum or Privacy Statement on this Site, or a similar website that replaces this Site. By continuing to use any of our Sites, you agree that the terms of this Addendum and the Privacy Statement as of the effective date will apply to information, including Personal Data, previously collected, or collected in the future as permitted by law.

How to Contact Us

Questions, comments or complaints about this Addendum or the Privacy Statement, Privacy Shield certification, or data collection and processing practices can be e-mailed to privacy.questions@us.gt.com, or by writing to us using the contact details below:

Corporate Mailing Address: Grant Thornton LLP
Privacy Office - Risk, Regulatory & Legal Affairs
171 N. Clark Street, Suite 200
Chicago, IL 60601