

Steer Privacy Notice for Virginia

This Virginia Privacy Notice section supplements the Steer Privacy Policy and applies to the personal data of Virginia residents in order to comply with the Virginia Consumer Data Protection Act (“VCDPA”), effective January 1, 2023. This notice applies to natural persons who are residents of Virginia acting only in an individual or household context. It does not apply to natural persons acting in a commercial or employment context.

Categories of personal data we collect

Contact data: We may collect information about data subjects such as name and contact details (email, phone number, etc.) in order to communicate and facilitate the provision of our services with our clients or potential clients. For example, contact details of individuals who work for or on behalf of the clients, in order to carry out the client’s engagement with Steer.

Services data: Personal data may be provided to us by clients to the extent required to perform the services. Steer may also acquire personal data from an individual themselves, or a third party, at the direction of our client as required to perform services (this can include information given by individuals in the context of a survey or research performed on behalf of our client).

Marketing information: We may collect information to respond to inquiries regarding our products and services or to provide you with information, reports, or updates.

Website visitor information: when you visit our website, we may collect information about your visit such as your IP address and the pages you visited and when you use our services, we may collect information on how you use those services. Please see our [Cookies Policy](#) for additional information.

Purposes for processing personal data

We process personal data to offer and administer our services and products. We use personal data for the purposes set out in the “How We Use Your Personal Data” section of the Steer Privacy Policy.

Sharing of personal data with third parties

We do not share personal data with third parties (other than service providers and affiliates) unless you direct us to do so, or where required by law.

We may share personal data with other parties as follows:

Our affiliates, as needed to operate our business and provide services.

Service providers or contractors, such as vendors, consultants and other service providers who perform certain services on behalf of Steer, in which case we enter a contract that describes the purpose of processing and requires the recipient to not use it for any purpose except performing the contract.

Selling, targeted advertising, and profiling

We do not sell personal data to third parties.

We do not process personal data for targeted advertising purposes (as defined under the VCDPA).

We do not process personal data for the purpose of profiling in furtherance of decisions that produce legal or similarly significant effects concerning consumers.

Your rights

Subject to the VCDPA and other applicable laws, you have the following rights concerning your data processed by Steer:

Deletion: You have the right to request that Steer erase your personal data, and Steer will erase such data unless it is reasonably necessary for Steer to maintain your personal data in accordance VCDPA 59.1-582

Correction: You have the right to request that Steer correct inaccurate personal data, taking into account the nature and purpose of processing the information.

Access: You have the right to request to access or obtain a copy of the personal data that Steer holds about you

Non-discrimination: Steer will not discriminate against a consumer because the consumer exercised any of the consumer's rights under applicable laws

Please contact us if you wish to exercise your rights under VCDPA or wish to appeal Steer's decision with respect to a request to exercise your rights: privacy@steergroup.com