

Data Privacy Policy September 2025

#### 1. Introduction

North American Securities Administrators Association, Inc. ("NASAA," "We," "Us," or "Our") is committed to protecting the privacy of Our users. This Data Privacy Policy ("Policy") outlines Our practices regarding the collection, use, disclosure, and protection of personal data (also referred to as 'Personal Information') obtained through NASAA's websites, platforms, and services. Also, the terms "you" and "your" refer to any individual accessing or using NASAA's websites, platforms, or services.

This Privacy Policy applies to all information collected via NASAA's websites, and other digital services that link to or reference this Privacy Policy (collectively, the "Sites"). By using the Sites, you consent to the collection and use of your information in accordance with this Privacy Policy.

## 2. Scope and Applicability

This Privacy Policy applies to all users of NASAA's Sites, including general visitors, registered filers, and state regulators. Additional privacy policies may apply to specific services provided by NASAA.

### 3. Information We Collect

We collect various types of information based on Our interactions with NASAA's internal sites as well as external sites We link to (such as <u>FINRA</u> or the <u>SEC</u>), where authorized Corporate Office Staff may collect or download relevant regulatory datasets to support Our operations. Below are examples of different types of information collected, but is not limited to:

- a. Information Collected from All Users
- Technical Data: IP address, browser type, operating system, referring URL, device identifiers.
- Usage Data: Clickstream behavior, pages visited, links clicked, access times.
- Cookies and Tracking Technologies: Used to recognize users and improve the user experience.

## b. Information Collected from Registered Users

- Personal Information: Name, email address, phone number, mailing address, organization details.
- Account Information: Login credentials and authentication data.
- Other miscellaneous data you provide to Us.

### 4. How We Use Your Information

We use collected information to:

- Provide, maintain, and improve Our services.
- Analyze publicly available datasets from external regulatory sources.
- Communicate with users regarding updates, regulatory notices, and system enhancements.
- Conduct security monitoring and fraud prevention.
- Analyze website traffic to enhance user experience.
- Comply with legal and regulatory requirements related to privacy, securities, and data at the federal, state, and cross-border levels.

## 5. Sharing and Disclosure of Information

We do not sell your Personal Information. However, we may share information with:

- Service Providers: Third-party vendors assisting in system maintenance, analytics, and security.
- Legal Authorities: To comply with applicable laws, legal proceedings, or government requests.

## 6. Data Security

NASAA employs industry-standard security measures, aligned with the National Institute of Standards and Technology (NIST) Cybersecurity Framework (Privacy Framework | NIST), including encryption, access controls, and secure data

storage, to protect against unauthorized access, alteration, disclosure, or destruction of user information.

### 7. Data Breach Notification

NASAA maintains procedures for identifying, responding to, and addressing data breaches involving Personal Information. In the event of a breach, NASAA will act in accordance with applicable laws to notify affected individuals and regulators as required.

### 8. Data Retention

We retain personal data for as long as necessary to fulfill the purposes for which it was collected, comply with legal obligations, resolve disputes, and enforce agreements.

# 9. Your Rights and Choices

Depending on your jurisdiction, you may have rights regarding your personal data, including:

- Accessing and correcting your information.
- Requesting data deletion (subject to regulatory obligations).

# 10. Cookies and Tracking Technologies

Our Sites use cookies to enhance functionality and analyze usage patterns.

Users can adjust browser settings to control cookie usage.

## 11. Third-Party Links and Data Extraction

Our Sites may contain links to external websites, including but not limited to the U.S. Securities and Exchange Commission (SEC) and the Financial Industry Regulatory Authority (FINRA), which are integral to Our regulatory and compliance functions. These external sites may host systems such as the Investment Adviser Registration Depository (IARD), Central Registration Depository (CRD), and BrokerCheck, which are utilized for data extraction and analysis purposes.

Please be aware that these external websites are operated by independent

organizations and are not under NASAA's control. Therefore, this Privacy Policy does not apply to the privacy practices or content of such external sites. We encourage users to review the privacy policies of these third-party websites to understand their data collection, use, and disclosure practices.

NASAA may engage in data extraction and data scraping activities on these external sites to fulfill Our regulatory and compliance responsibilities. These activities are conducted in accordance with applicable laws and regulations, and the data collected is used solely for legitimate regulatory purposes. We are committed to maintaining the confidentiality and security of any data obtained through these means.

By following links to these external sites, users acknowledge that NASAA is not responsible for the content or privacy practices of these third-party websites. Users are advised to exercise caution and review the privacy policies of any external sites they visit.

# 12. Changes to this Privacy Policy

NASAA reserves the right to update this Data Privacy Policy periodically. Any significant changes will be communicated via Our website at <a href="https://www.nasaa.org">www.nasaa.org</a>.

#### 13. Contact Information

If you have questions about this Privacy Policy, please contact Us at:

North American Securities Administrators Association, Inc.

750 First Street, N.E., Suite 990

Washington, D.C. 20002

Email: submit a message to NASAA here.

Phone: 202-737-0900