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# PRIVACY POLICY - WEBSITE

LFD-POL-001-00

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## Privacy Policy – Website

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### Privacy Policy

Last Updated: July 9, 2024

This website is operated by LFD Consulting, LLC (hereinafter the “LFD”). This privacy policy governs your access to LFD’s website [www.lfdconsulting.com](http://www.lfdconsulting.com) (the “Website”) and the services provided by LFD (the “Services”). The term “you”, “your”, or “User(s)” shall refer to any entity or person that accesses, views, uses our Services, and/or starts an account with us. The terms “we”, “our”, and “us” shall refer to LFD.

Since we may gather certain types of information about our users, we feel you should fully understand our policy and the terms and conditions surrounding the capture and use of that information. This Privacy Policy discloses what information we gather and how we use it. The private information you provide on the Services will be used only for its intended purpose.

**BY VISITING, SIGNING UP, USING AND ACCESSING THE SERVICES, YOU CONSENT TO THE DATA PRACTICES DESCRIBED IN THIS STATEMENT. DO NOT USE THE SERVICES IF YOU DO NOT AGREE WITH OUR PRIVACY PRACTICES.**

### INFORMATION WE COLLECT

We will collect information, including both Personal Information and Non-Personal Information, when you interact with us and the Services, for example when you:

- Access or use the Services
- Create an account with us
- Open or respond to our e-mails
- Contact customer service
- Visit any page online that displays our ads or content
- Job Application

## PERSONAL INFORMATION

“Personal Information” means information about you that specifically identifies you or, when combined with other information we have, can be used to identify you. As a general rule, we do not collect Personal Information about you when you visit and/or use the Website, unless you choose to provide such information to us. Submitting personal information through the Website is voluntary. By doing so, you are giving us your permission to use the information for the stated purpose.

**LEGAL BASIS FOR COLLECTING YOUR PERSONAL INFORMATION** We collect, process and use your information for the purposes described in this Privacy Policy, based at least on one of the following legal grounds:

- **With Your Consent:** We ask for your agreement to process your information for specific purposes, and you have the right to withdraw your consent at any time.
- **When Performing This Agreement:** We collect and process your Personal Information to provide you with the services, following your acceptance of this Privacy Policy; maintain and improve our Website and Services; develop new services and features for our Users; and personalize the Website to improve your user experience.

- **Legitimate Interests:** We process your information for our legitimate interests while applying appropriate safeguards that protect your privacy. This means that we process your information for things like detecting, preventing, or otherwise addressing fraud, abuse, security, usability, functionality or technical issues with our Website, protecting against harm to the rights, property or safety of our properties, or our users, or the public as required or permitted by law; enforcing legal claims, including investigation of potential violations of this Privacy Policy; in order to comply and/or fulfill our obligation under applicable laws, regulation, guidelines, industry standards and contractual requirements, legal process, subpoena or governmental request, as well as our Terms and Conditions and our billing process.

**INFORMATION WE COLLECT AND HOW WE COLLECT INFORMATION** Through this Website and the associated Services, we may collect information that can identify you when you voluntarily submit it to us. Your Personal Information may include:

- Your name
- Email address
- Telephone number
- Date of birth
- Current address or principal place of business
- Banking and/or credit card information
- Other similar information

**STORAGE OF PERSONAL INFORMATION** We will take reasonable precautions, as well as physical, technical, and organizational measures in accordance with industry standards, as described herein, to protect your Personal Information from loss, misuse, unauthorized access, disclosure, alteration, or destruction. The Website is maintained in the United States of America and all servers, which store your Personal Information, are secured and located in the United

States of America. Computer safeguards, such as firewalls and data encryption may be used to protect your information. We authorize access to your information only for those employees or agents who require it to fulfill their job responsibilities and these individuals are required to treat this information as confidential. However, the security of information on or transmitted via the Internet cannot be guaranteed. Unauthorized entry of use, hardware or software failures, and other factors may compromise the security of your Personal Information. All information you send to us electronically or through email is not secure. Any transmission is at your own risk as the transmission of information via the Internet is not completely secure. Users are solely responsible for protecting their passwords, limiting access to their computers, and signing out of the Account after their sessions. Your information will be retained for as long as your Account is active or is needed to provide you with the Services, having regard to the purposes described in the Privacy Policy and the legal and regulatory requirements.

## NON-PERSONAL INFORMATION

We collect and temporarily store certain information about your usage of the Website. Non-personal information means information that alone cannot identify you, including data such as cookies, pixel tags, web beacons, and device information. The information includes, without limitation:

**Device Data** – We may collect information such as: the type of computer and/or mobile device you use; the unique device ID of your computer and/or mobile device; the IP address of your computer and/or mobile device; the operating system of your computer and/ or mobile device; and the type of mobile internet browsers of your computer and/or mobile device.

**Usage Details** – When you access and use the Website, we may automatically collect certain details of your access to and use of the Website, including traffic

data, location data, logs and other communication data and the resources that you access and use on or through the Website.

Location Information – When you first visit or use the Website we may request permission to collect and use your device’s precise geolocation. You can opt not to permit the collection of this information, but you may not be able to use the Website and the Services provided by LFD without access to your location. We need your location information in order to provide our Services. You can control how and whether we collect your precise geolocation information through your device’s settings.

If you do not want us to collect this information, you may either change your device’s privacy settings or do not access or use the Website or the Services.

## PERSONAL HEALTH INFORMATION

We shall not have access to any Protected Health Information or Electronic Protected Health Information, (collectively the “PHI”) of any third party. In the event we inadvertently or accidentally have access to any PHI, we will not use or further disclose any other than as permitted or required by Law. PHI means, subject to the definition provided at 45 C.F.R. § 160.103, individually identifiable health information that we receive from a Covered Entity or a Business Associate or creates, receives, transmits, or maintains on behalf of a Covered Entity for purposes of performing services. We will at all times use appropriate safeguards and comply with the Security Rule at Subpart C of 45 C.F.R. Part 164 (where applicable), with respect to PHI, to prevent use or disclosure of the PHI other than as provided for by this Section. LFD will report to any applicable party any use or disclosure of PHI not provided for or permitted of which it becomes aware or any security incident of PHI of which it becomes aware.

## INFORMATION COLLECTION TECHNOLOGIES

The technologies we use for automatic information collection may include:

**Cookies (or mobile cookies):** We may use “cookies” on our Website to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you. The purpose of a cookie is to tell the web server that you have returned to a specific page. You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Website.

**Web Beacons:** Pages of the Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an e-mail and for other related Website statistics.

**Social Ad Platforms:** We may also use Google Analytics, Facebook, Twitter and LinkedIn’s functionality of re-marketing through their tracking cookies and pixel-based retargeting services. This means that if you provided your consent to Google, Facebook, Twitter or LinkedIn (the “Social Ad Platforms”) to be provided with personalized commercial offers, you may be served with ads (including advertisements of third parties) based on your access to the Website, outside of the Website and across the internet. In such event, the Social Ad Platforms, will place cookies on your web browser and use such cookies to serve you ads based on past visits to our Website.

## CHANGING YOUR DATA COLLECTION SETTINGS

We strive to provide you with choices regarding the Personal Information you provide to us. You may need to adjust the settings on your computer and/or device to restrict the collection of information by the Website, but this may prevent you from accessing all of the features of the Website.

**Tracking Technologies:** You may set your browser or device to refuse all or some browser cookies or alert you when cookies are being sent. If you disable or refuse cookies or block other tracking technologies, some parts of the Website may be inaccessible or not function properly.

**Location Information:** Through the device's privacy settings, you can choose whether or not to allow the Website to collect and use real-time information about your device's location. If you block the use of location information, some parts or all of the Website may be inaccessible or not function properly.

**Social Ad Platforms:** If you wish to opt-out of re-targeting and tracking functionality of the Social Ad Platforms, you may do so through each platform directly. PLEASE NOTE that this tracking and targeting by Social Ad Platforms are provided pursuant to your engagement with the Social Ad Platforms, and the actual nature and scope of Personal Information collection and processing performed by such Social Ad Platforms may not be fully known to us. If you would like to learn more or make further inquiries with respect to such nature or scope, please refer to each Social Ad Platform directly.

In addition, if you wish not to receive ads from us based on information we obtain from using cookies and pixel tags, send us an email to [linda@lfdconsulting.com](mailto:linda@lfdconsulting.com). We will respond within a reasonable time frame and in accordance with applicable laws.



## THIRD-PARTY AUTOMATIC INFORMATION COLLECTION

When you use the Website or its content, certain third parties may use automatic information collection technologies to collect information about you or your device. These third parties may include:

- Advertisers, ad networks, and ad servers
- Analytic companies
- Your mobile device manufacturer
- Your mobile service provider
- Your internet provider

These third parties may use tracking technologies to collect information about you when you use the Website. The information they collect may be associated with your Personal Information or they may collect information about your online activities over time and across different websites, mobile applications and other online sites. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content. We do not control these third parties' tracking technologies or how they may be used. You should contact the responsible provider directly if you have any questions about an advertisement or other targeted content.

## HOW WE USE YOUR INFORMATION

We use information collected as described in the Privacy Policy for the following:

- Operation, maintain and improve the Website and Services
- Provide you with the Website and their contents, and any other information, products, or services that you request from us
- Manage your account

- Send you reminders, technical notices, updates, security alerts, support, and administrative messages and marketing messages
- Answer your questions and respond to your requests
- Ensure that content from our Website is presented in the most effective manner for you and for your computer or device for accessing the Services
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including the Terms and Conditions
- Notify you when there are changes to any products or services we offer or provide through the Website
- Usage and Analytics
- Estimate our audience size and usage patterns
- Perform analytics and conduct customer research
- Analyze advertising effectiveness
- Communicate and provide additional information that may be of interest to you about us and our business partners

Location: We will use location data for the following reasons:

- To provide our Services targeted to the city in which you are located
- To display information that is relevant to your particular location

## HOW WE DISCLOSE YOUR PERSONAL INFORMATION

The Personal Information you provide to us whether voluntarily or automatically, may be used and disclosed without limitations, in the following instances:

With vendors who provide services for us (who are required to protect the Personal Information)

To report or collect on debts owed to us or our Business Partners

To a prospective buyer or buyer of LFD, or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all our assets

As part of bankruptcy, liquidation, or similar proceeding

To comply with legal requirements for the enforcement of law, regulations, court orders, subpoena, a warrant during the course of a legal proceedings or otherwise

To protect and safeguard our copyright, trademarks, legal rights, intellectual property rights or safety

In response to a subpoena, or similar legal process, including to law enforcement agencies, regulators, and courts in the United States

## HOW WE DISCLOSE YOUR NON-PERSONAL INFORMATION

We may also disclose Non-Personal Information:

For the same reasons we might share Personal Information

With our advertisers for their own analysis and research

To facilitate targeted content and ads

With Third-Party Ad Servers to place our ads on the Services and on third-party websites

## HOW TO ACCESS, UPDATE, WITHDRAW CONSENT OR DELETE YOUR INFORMATION

If the law applicable to you grants you such rights, you may ask to access, correct, or delete your Personal Information that is stored in our systems or that we otherwise control. You may also ask for our confirmation as to whether or not we process your Personal Information or ask to withdraw any consent you have previously provided to LFD in connection with our use and processing of your Personal Information. Subject to the limitations in law, you may request that we update, correct, or delete inaccurate or outdated information. You may also request that we suspend the use of any Personal Information the accuracy of which you contest while we verify the status of that data.

If you wish to exercise any of these rights or withdraw your consent, please contact us at: [linda@lfdconsulting.com](mailto:linda@lfdconsulting.com). When handling these requests, we may ask for additional information to confirm your identity and your request. Please note, upon request to delete your Personal Information, we may retain such data in whole or in part to comply with any applicable rule or regulation and/or response or defend against legal proceedings versus us or our affiliates, or as we are otherwise permitted under such law applicable to you. While we strive to honor all reasonable requests, please be aware that we backup the data to prevent accidental or malicious destruction of your information. Information on backup servers may take some time to be completely deleted from the system. If you request that we remove you from our system and delete all your information, please note that you may still receive materials while your request is being processed.

If you request that your information be deleted, we will keep your information for a period of time in order to deter fraud, by ensuring that persons who try to commit fraud will not be able to avoid detection simply by closing their Account and opening a new Account. However, if you request to delete your

information, your Personal Information will not be used by us or our third-party providers for any further purposes, nor sold or shared with third parties, except as necessary to prevent fraud and assist law enforcement, as required by law, or in accordance with this Privacy Policy.

## SECURITY

We take reasonable steps to protect the personal data provided to us from unauthorized access, use or disclosure. The safety and security of your information also depends on you. Unfortunately, the transmission of information via the internet and mobile services is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your personal information transmitted through our Website. Any transmission of Personal Information is at your own risk. We are not responsible for any third-party circumvention of any privacy settings or security measures we provide. If you suspect that there has been a breach of the security of your data you should contact us and include details of the nature of the breach, the date of the breach, and the full circumstances of the breach.

## COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

We represent and warrant that we will comply with all applicable laws, rules, regulations, directives and guidelines regarding the collection, use and disclosure of data collected from or about Users or specific devices which apply to the services utilized hereunder (collectively, the "Rules"). The term "Rules" shall include, without limitation, (i) United States Federal Trade Commission Laws regarding the collection, use and disclosure of data from or about users and/or specific devices; (ii) the Children's Privacy Protection Act of 1998 (COPPA) and (iii) if applicable, the Rules of any other jurisdiction,

including and European Union General Data Protection Regulation (“EU GDPR”), rules, regulations and/or directives promulgated by a pertinent Data Protection Act, and all amendments and updates to them or regulations as replaced or superseded from time to time.

## NOTICE CONCERNING CHILDREN

We do not direct our Website or Services directly or indirectly towards children. We do not target the Website towards children, nor do we knowingly collect information about children. If we learn that the information of a child under the age of thirteen (13) is stored within its system, we will promptly delete any information in that Account. If you become aware that a child under the age of 13 has provided us with Personal Information, please notify us immediately and we will terminate the Account and delete such information.

## UPDATES TO THIS POLICY

We reserve the right to change, modify, update, add, or remove portions of this Privacy Policy at any time. Any changes or updates will be effective immediately upon posting to this page. When we do update it, for your convenience, we will make the updated policy available on this page. If you opt out of receiving communications, you may not receive certain notifications, however, they will still govern your use of the Services, and you are responsible for proactively checking for any changes. We encourage you to check this Privacy Policy frequently to stay up to date on any changes. You can determine if changes have been made by checking the effective date on the Privacy Policy. Continued use of the Website after the effective date of any change in this Privacy Policy will constitute acceptance of such changes and it will signify that you agree to abide by and be bound by the modified Privacy Policy.

## CONTACT US

If you have questions, comments, or concerns regarding this Privacy Policy, please contact us and we will respond to your request within a reasonable timeframe. Please include the following information in your request (1) Your name; (2) Your contact information, including phone number, mailing address, and email address; and (3) The precise nature of your request, inquiry, or complaint.

### By Mail:

LFD Consulting LLC  
P.O. Box 3372  
Cordova, TN 38088

### By Email:

[linda@lfdconsulting.com](mailto:linda@lfdconsulting.com)

## CALIFORNIA CONSUMER PRIVACY ACT

These additional disclosures are required by the California Consumer Privacy Act and are effective as of July 6, 2022:

**Categories of personal information collected.** The personal information that we may collect, or may have collected from consumers in the preceding twelve months, fall into the following categories established by the California Consumer Privacy Act, depending on how you engage with LFD:

- Identifiers, such as your name, alias, address, phone numbers, or IP address;
- Personal information as described in subdivision (e) of Section 1798.80 of the California Civil Code, such as a credit card number;

- Characteristics of protected classifications under California or US federal law, such as age or gender, for example if we conduct user surveys or analysis;
- Commercial information, such as purchase activity;
- Internet or other electronic network activity information, including content interaction information, such as content downloads, streams, and playback details;
- Biometric information, such as your voice or appearance, for example if you choose to participate in a demonstration of a speech or image recognition service;
- Geolocation data, such as the location of your device or computer, for example if you enable location services to enhance your experience through event applications we offer;
- Audio, visual, electronic or other similar information, including when you communicate with us by phone or otherwise;
- Professional or employment-related information, for example data you may provide about your business;
- Inference data, such as information about your preferences; and
- Education information, such as information about enrollment status, fields of study, or degrees, honors, and awards received.

For more information about the personal information we collect, refer to the section above “INFORMATION WE COLLECT AND HOW WE COLLECT INFORMATION”.

**Categories of personal information disclosed for a business purpose.** The personal information that we may have disclosed about consumers for a business purpose in the preceding twelve months fall into the following categories established by the California Consumer Privacy Act, depending on how you engage with the LFD:

- Identifiers, such as your name, address, or phone numbers;



- Personal information as described in subdivision (e) of Section 1798.80 of the California Civil Code, such as a credit card number, for example if we use a third-party payment processor;
- Your age, gender, or other protected classifications under California or US federal law, for example if we conduct user surveys or analysis using a third-party service provider;
- Commercial information, such as the details of a product or service you purchased if a third-party service provider is assisting to provide that product or service to you;
- Internet or other electronic network activity information, such as if we use a third-party service provider to help us gather reports for analyzing the health of our devices and services;
- Biometric information, for example if you choose to participate in a demonstration of certain LFD services facilitated by a third-party service provider;
- Geolocation data, for example if we enable transportation services from a third party in connection with an LFD event;
- Audio, visual, electronic or other similar information, for example if a third-party service provider reviews recordings of customer support phone calls for quality assurance purposes;
- Professional or employment-related information, for example if we provide information to a third-party service provider for verification or registration as part of the LFD Offerings; and
- Education information, for example if we facilitate employment or internship recruitment activities for participants

For more information about the personal information we may disclose to third parties for a business purpose, <https://www.lfdconsulting.com/>

**Your Rights.** You may have the right under the California Consumer Privacy Act to request information about the collection of your personal information by us, or access to or deletion of your personal information. If you wish to do any

of these things, please contact [linda@lfdconsulting.com](mailto:linda@lfdconsulting.com) Depending on your data choices, certain services may be limited or unavailable.

**No sale of personal information.** In the preceding twelve months, we have not sold any personal information of consumers, as those terms are defined under the California Consumer Privacy Act.

**No Discrimination.** We will not discriminate against any consumer for exercising their rights under the California Consumer Privacy Act.

## GDPR

### **Our General Data Protection Regulation (GDPR) commitment**

LFD has always been committed to protecting the data and information of our clients and candidates.

In instances where data sharing with third-parties was required, we have requested express permission from candidates, ensuring they retain full control of their data.

We welcome the introduction of the European Unions's GDPR, as we believe it will raise standards across the recruitment sector. We are pleased to be able to take this opportunity to reaffirm our commitment to our candidates.

We are committed to protecting your data; we are committed to never using it inappropriately and we are committed to honesty and transparency. We will comply with all GDPR requirements.

Data retention be 180 for this specific purpose, unless superseded by other LFD policies.

**COMPLIANCE & ENFORCEMENT**

All applicable managers and supervisors are responsible for enforcing the provisions of this document. Workforce members who violate these policies and procedures may be subject to discipline up to and including termination.

**DISTRIBUTION**

The baseline document resides in Google Drive

**VERSION CONTROL**

The version and approvals reside in Google Drive

Date	Version Number	Person making change(s)	Description of change(s)
7/09/2024	00		Original Draft