

COSTON

Consulting

DATA PRIVACY POLICY

Your Privacy at Coston Consulting

Your privacy is truly important to us. That's why we have created this agreement—to share with you our information practices, including what information we collect, how it's used and with whom the information is shared. It is important to us that you know we are committed to controlling the collection, use, and disclosure of personally identifiable information that we collect about you.

This Agreement may be amended from time to time. (See "Further Information," below for an explanation of how we will advise you of any future changes).

In this Agreement, "we," "our," "us," and "Coston Consulting" mean Coston Consulting; "you" and "your" mean an individual who has agreed to use our website for registration, enrollment, and or requested information from us about our Services.

Collecting Your Information

When you register or subscribe on our website, you agree that we may collect personal information from you and about you such your name, address, telephone number, and email address. By submitting Personal Information to Coston Consulting, you agree that we may use and disclose such Personal Information as described in and in accordance with this Policy and as permitted or required by law.

When you subscribe for, enroll in, or use a Product or Service via a digital channel (such as online or mobile app), we may collect information about your computer or device, operating system, internet connection or telephone account, settings, IP address and device locational data, and transaction data, as well as personal information as described above. We may collect, use, disclose, and retain this information for the purposes described below, as well as to determine which settings are appropriate for your computer system, to provide or enhance digital functionality, and for security purposes, internal analysis, and reporting. You may withhold consent to the collection, use, and disclosure of this information, although in some cases this may prevent you from using the digital channel to apply for or use a Product or Service or to communicate with us, or may reduce the functionality of that channel.

For certain projects, Coston Consulting may use technology platforms like [SurveyMonkey](#), [Zoom](#), [Medallia](#), [SurveySparrow](#), or other platforms to collect demographic information, feedback, or other data in connection with client engagements, surveys, programs, events, and special projects. During these occasions, Coston Consulting's use of such platforms is consistent with all applicable laws, regulations, and policies. All Coston Consulting employees are responsible for ensuring that all uses of any third-party applications are undertaken in accordance with applicable federal laws, regulations, and relevant privacy, security, and social media policies. Our company policy is to only use technology platforms that do not sell or share survey responses or other sensitive information with third-party advertisers or marketers.

Use and Disclosure of your Personal Information

We may collect your personal information for any of the following purposes:

- To understand your needs
- To determine the suitability of our Services for you
- To determine your eligibility for our Services
- To set up, manage, and offer Services that meet your needs

- To provide you with ongoing Services
- To satisfy legal and regulatory requirements that are applicable to us

Coston Consulting will not disclose any of your personally identifiable information, except when we have your permission or under special circumstances, such as when we believe in good faith that the law requires it.

Security Precautions and Safety Measures

When you give Coston Consulting personal information, we take steps to ensure that your information is treated securely. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, Coston Consulting cannot ensure or warrant the security of any information you transmit to us, and you do so at your own risk. Once we receive your transmission, we make our best effort to ensure its security on our systems.

E-mail messages may not be secure and may be intercepted by third parties. If you send us an e-mail containing confidential information about you, you agree that you do so at your own risk and will not hold us responsible for any loss that you suffer as a result.

Monitoring and Recording Personal Information

You agree that, with your prior consent, we may monitor, record, and retain any telephone call or electronic communication we have with you. This is to establish a record of the information you provide, to ensure that your instructions are followed properly and to ensure customer service levels are maintained. Records of calls and electronic communications are destroyed when they are no longer required for business or other purposes, and any personal information is safeguarded in accordance with this Agreement.

Refusing or Withdrawing Consent

Subject to legal, regulatory, and contractual requirements, you can refuse to consent to our collection, use or disclosure of information about you, or you may withdraw your consent to our further collection, use or disclosure of your information at any time in the future by giving us reasonable notice. However, depending on the circumstances, withdrawal of your consent may prevent us from providing you, or continuing to provide you, with some Services, means of access to Services, or information that may be of value to you. We will act on your instructions as quickly as possible.

You can tell us at any time to stop using information about you to promote our Services.

Your GDPR Rights

Visitors within the European Union have specific rights under the General Data Protection Regulation, including:

- We will retain any information you choose to provide to us until the earlier of: (a) you asking us to delete the information, (b) our decision to cease using our existing data providers, or (c) Coston Consulting decides that the value in retaining the data is outweighed by the costs of retaining it.
- You have the right to request access to your data that Coston Consulting stores and the rights to either rectify or erase your personal data.
- You have the right to seek restrictions on the processing of your data.
- You have the right to object to the processing of your data and the right to the portability of your data.

- To the extent that you provided consent to Coston Consulting's processing of your personal data, you have the right to withdraw that consent at any time, without affecting the lawfulness of processing based upon consent that occurred prior to your withdrawal of consent.
- You have the right to lodge a complaint with a supervisory authority that has jurisdiction over issues related to the General Data Protection Regulation.
- We require only the information that is reasonably required to enter into a contract with you. We will not require you to provide consent for any unnecessary processing as a condition of entering into a contract with us.

Access to Personal Information

You may ask for access to any personal information that we hold about you. Summary information will be available within a reasonable period of time upon request. More detailed requests which require archive or other retrieval costs may be subject to any costs and expenses we incur in retrieving same. We may deny access when denial of access is authorized by law or may unreasonably compromise the confidentiality of another person's Personal Information.

Privacy and Electronic Communication

Coston Consulting does not guarantee the confidentiality of any communications made via email or otherwise through our website and cannot guarantee that any such communications are confidential. If you wish to provide information of a confidential or sensitive nature to Coston Consulting, please connect with us directly by telephone to arrange for delivery/transmission of such information by secure means.

Links

Our websites may contain links to other sites, which may have privacy practices and policies that differ from our own. Coston Consulting is not responsible for the content or practices of any linked site. We recommend that you review the privacy policy of any site that you access through our sites. The inclusion of a link to a third-party site on our websites does not imply that Coston Consulting endorses such site.

Retention of Personal Information

We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this policy unless a longer retention period is required or permitted by law. However, as a matter of protocol, all client information collected for the purposes of individual, group, or organizational surveys is destroyed and deleted within 60 days upon the completion of relevant projects or engagements, or sooner upon client request.

Questions and Further Information

If you wish to refuse consent or to withdraw consent as outlined in this Agreement or if you have any questions related to this Policy or the handling of Personal Information by Coston Consulting can be addressed by contacting us at acrisi@costonconsulting.com.

Please note that if you refuse to consent or withdraw your consent, we may not be able to provide you or continue to provide you with certain Services or information which may be of value to you.

You acknowledge that we may amend this Agreement from time to time to take into consideration changes in legislation, technology, or other issues that may arise. We will post the revised Agreement on our website.

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Your continued use of the Services following such change means that you agree to and accept the new terms and conditions of this Policy as amended. If you do not agree with any of the changes made or with the new terms of the Policy, you must immediately stop using the account or Services and notify us that you are closing your account or terminating your Products and Services with us.

If you have a general question about our privacy policies, please contact us at acrisi@costonconsulting.com.