

# PRIVACY POLICY

## OWNER AND DATA CONTROLLER

**Edinger Consulting** (“us”, “we”, or “our”) operates <https://edingerconsulting.com/> (the “Site”).

We are committed to protecting and respecting your privacy. This Site collects some personal data from its users.

This Privacy Policy informs you of our views, practices and policies regarding the collection, use and disclosure of personal data we receive from users of the Site. By submitting personal data to us, you agree to us using your personal data as follows.

## INFORMATION COLLECTION, PURPOSE AND USE

While using our Site, we may ask you to provide us with certain personally-identifiable information that can be used to contact or identify you. Personally-identifiable information may include, but is not limited to name, email address, cookies, usage data.

We may use your personal information to:

- send you our newsletters from time to time
- manage contacts and send messages
- ensure that content from our site is presented in the most effective manner for you and for your computer
- provide you with information, products or services that you request from us which may be of interest to you
- carry out our obligations arising from any contracts entered into between you and us
- interact with external social networks and platforms (e.g. social media widgets and share bars)
- allow registration and authentication (e.g. affiliate portals and membership areas)
- allow access to third party services’ accounts
- monitor infrastructure
- manage hosting and backend infrastructure
- display content from external platforms
- interact with support and feedback platforms
- manage user database

In addition to the above, we may collect, log data and use cookies.

## Log Data

Like many site operators, we collect information that your browser sends whenever you visit our Site.

This Log Data may include information such as your computer’s Internet Protocol (“IP”) address, browser type, browser version, the pages of our Site that you visit, the time and date of your visit, the time spent on those pages and other statistics.

In addition, we may use third party services such as Google Analytics that collect, monitor and analyze this data.

To comply with GDPR, we have updated the Analytics settings on our site to anonymize IPs.

## **Cookies**

Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive.

Like many sites, we use "cookies" to collect information.

We use cookies to save the user's session and to carry out other activities that are strictly necessary for the operation of this Site, for example in relation to the distribution of traffic.

We use cookies to save browsing preferences and to optimize your browsing experience.

Some third parties (such as, for example, Google Analytics and Google AdSense), collect statistics in an anonymized and aggregated form and may not require the consent of the user or may be managed directly by us without the help of third parties.

These may be used to track users' browsing habits – in addition to the information specified herein and without our knowledge. Please refer to the privacy policy of the listed services for detailed information.

In addition to what is specified in this privacy policy, the user can manage preferences for cookies directly from within their own browser and prevent – for example – third parties from installing cookies.

Through browser preferences, it is also possible to delete cookies installed in the past, including the cookies that may have saved the initial consent for the installation of cookies by this Site.

Users can, for example, find information about how to manage cookies in the most commonly used browsers (e.g. Google Chrome, Mozilla Firefox, Apple Safari and Microsoft Internet Explorer) on the website of the browser of choice.

With regard to cookies installed by third parties, users can manage their preferences and withdrawal of their consent by clicking the related opt-out link (if provided), by using the means provided in the third party's privacy policy, or by contacting the third party.

## **DATA STORAGE**

Your personal data may be transferred to, and stored at, a destination outside the European Economic Area ("EEA").

By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

## **LAWFUL BASIS OF PROCESSING PERSONAL DATA**

We may process personal data relating to users if one of the following applies:

- users have given their consent for one or more specific purposes;
- provision of data is necessary for the performance of an agreement with the user and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which we are subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in us;
- processing is necessary for the purposes of the legitimate interests pursued by us or by a third party.

## **DATA RETENTION**

We process and store your personal data for as long as required by the purpose they have been collected for.

Therefore:

- personal data collected for purposes related to the performance of a contract between us and the user will be retained until such contract has been fully performed;
- personal data collected for the purposes of our legitimate interests will be retained as long as needed to fulfill such purposes;
- we may be allowed to retain personal data for a longer period whenever the user has given consent to such processing, as long as such consent is not withdrawn;
- we may be obliged to retain personal data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, personal data will be deleted and some of your rights (i.e. the right to access, the right to erasure, the right to rectification and the right to data portability) cannot be enforced after expiration of the retention period. You may find specific information regarding your rights within the relevant section of this Privacy Policy.

## **THIRD-PARTY DISCLOSURE**

We do not sell, trade, or otherwise transfer to outside parties your personal information unless we provide users with advance notice. This does not include website hosting partners and other parties who assist us in operating our website, conducting our business, or serving our users (such as, for example, Active Campaign or Converkit), so long as those parties agree to keep this information confidential. We may also release information when its release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property or safety.

However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

## **YOUR RIGHTS**

Users have the right to do the following:

- Withdraw their consent at any time. Users have the right to withdraw consent where they have previously given their consent to the processing of their personal data.
- Object to processing of their data. Users have the right to object to the processing of their data if the processing is carried out on a legal basis other than consent.
- Access their data. Users have the right to learn if data is being processed by us, obtain disclosure regarding certain aspects of the processing and obtain a copy of the data undergoing processing.
- Verify and seek rectification. Users have the right to verify the accuracy of their data and ask for it to be updated or corrected.
- Restrict the processing of their data. Users have the right, under certain circumstances, to restrict the processing of their data. In this case, we will not process their data for any purpose other than storing it.
- Have their personal data deleted or otherwise removed. Users have the right, under certain circumstances, to obtain the erasure of their data from us.
- Receive their data and have it transferred to another controller. Users have the right to receive their data in a structured, commonly used and machine-readable format and, if technically feasible, to have it transmitted to another controller without any undue delay.
- Lodge a complaint. Users have the right to bring a claim before their competent data protection supervisory authority.

You can exercise your right to prevent such processing by contacting us at [info@edingerconsulting.com](mailto:info@edingerconsulting.com)

These requests can be exercised free of charge and will be addressed by us as soon as possible within 30 days.

## **SECURITY**

The security of your personal information is important to us.

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems and are required to keep the information confidential.

In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology.

We implement a variety of security measures when a user places an order enters, submits, or accesses their information to maintain the safety of your personal information.

All transactions are processed through a gateway provider and are not stored or processed on our servers.

Unfortunately, no method of transmission over the internet is completely secure. While we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

#### **PUBLIC COMMENTS**

We occasionally allow public commenting and you may leave comments on blog posts. Please remember that any information you provide is not private. The information can be viewed by anyone online including family, friends, the media, investigators, and potential employers conducting background checks.

#### **THIRD PARTY WEBSITES**

We link to other websites, but please keep in mind that we do not control the privacy policies of those websites. Make sure to review the policies of any such sites before providing your personal information.

#### **SALE OF BUSINESS**

Should we sell this website or the business, your personal information will be an asset transferred to the new owner.

#### **CALIFORNIA ONLINE PRIVACY PROTECTION ACT**

We agree to users visiting our Site anonymously.

#### **COPPA (CHILDREN ONLINE PRIVACY PROTECTION ACT)**

For the collection of personal information from children under the age of 16 years old, we comply with the Children's Online Privacy Protection Act (COPPA).

We do not specifically market to children under the age of 16 years old.

#### **CHANGES TO THIS PRIVACY POLICY**

This Privacy Policy is effective as of May 25, 2018 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of our Site after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our website.

## **CONTACT US**

If you have any questions about this Privacy Policy, please contact us at [info@edingerconsulting.com](mailto:info@edingerconsulting.com)

Thanks!

Edinger Consulting