



## PRIVACY POLICY

Your privacy is important to the SDL Consulting Firm (The terms, “we”, “us” and “our” throughout this document mean SDL Consulting Firm). Please read our Privacy Policy carefully to understand how we collect, use, disclose, transfer, and store your information. By visiting our website or agreeing to content that includes a link to this document (“Online Ads”), you agree to the practices described in this Privacy Policy and our Terms of Use.

### **1. Our Collection and Use of Personal Information**

Personal Information includes information you provide us that can be used to identify or contact a single person, such as your name, address, email address, phone numbers and last four digits of your Social Security Number.

You may be asked to provide Personal Information when you interact with us, Online Ads, affiliates, or one of our related companies.

We may supplement the Personal Information you provide with Personal Information available from other sources, such as credit bureaus, public databases, data aggregators, and other commercially-available sources.

### **2. Examples of Personal Information We Collect and How We Use It**

You may provide us a variety of Personal Information, including your name, mailing address, email address, phone number, payment information, and last four digits of your Social Security Number.

The Personal Information we collect allows us to verify your identify, deliver requested products and services, and provide you information and offers from Service Providers and affiliates, as those terms are defined in the Privacy Notice, regarding credit and financial management. It also allows us to stay in contact with you. By providing us with Personal Information, you consent to our storage of that information.

## Email

We also may use your Personal Information for research, development, and analysis, and for advertising, marketing, product and service offerings, security, fraud prevention, and other business activities.

For example, we may use your email address to:

- Confirm your identity;
- Send you information on the status of your account or transaction;
- Contact you if we need your assistance to complete a transaction; and
- Send you newsletters, and other customer related material as permitted by law.

We have a zero tolerance policy for email abuse. If you receive unsolicited emails from us please report it to us. We are not responsible for communications you may receive from non-affiliated third parties.

We will never ask you to provide Personal Information in an email. DO NOT RESPOND to an email that appears to be from us requesting Personal information. Contact us immediately at (901) 220-3656.

### **3. Our Collection and Use of Non-Personal Information**

Non-Personal Information is information in a form that does not allow for direct association with a specific person. This information is compiled and analyzed on both a personal and an aggregated basis. We may collect, use, monitor, analyze, transfer, and disclose Non-Personal Information for any purpose.

### **4. Examples of Non-Personal Information We Collect and How We Use It**

We may collect and aggregate information regarding user access, activity and behavior on our website, such as when you visit the website and what content is of interest or seems to be most useful to you. If we combine Non-Personal Information with Personal Information, the combined information is treated as Personal Information for purposes of this Privacy Policy.

Non-Personal Information includes:

Device Information - We may collect specific information for the device you use to access our website. For example, we may collect device model, operating system version, application software, and fonts.

**Cookies and Other Technologies** - We use a variety of technologies to collect and store information when you visit our website. This technology may involve sending web beacons and cookies or anonymous identifiers to your device. We use Cookies and Other Technologies to analyze your behavior when accessing our website and to deliver ads to you that we believe relate to your interests.

**Log Information** - When you visit our website, we collect certain information automatically and store it in log files. This information includes IP address, browser version, ISP data, referring and exit pages, operating system version, date / time stamps, cookie data, and clickstream data. We use Log Information to administer the website, analyze trends, maintain site security, learn about user behavior, and improve the overall quality and availability of the site.

**Click-Through URLs** - In some email messages, we use a Click-Through URL to link to content on our website. When you click one of these URLs, you pass through a separate web server before reaching our site. We use Click-Through URLs to help us determine interest in a particular topic and to measure the effectiveness of our email communications.

**Anonymized Information** - If we separate Non-Personal Information from Personal Information, the resulting Anonymized Information is treated as Non-Personal Information for purposes of this Privacy Policy.

## **5. Our Sharing of Information with Others**

### **Personal Information**

We do not share Personal Information with businesses or individuals outside of the SDL Consulting Firm, except under the follow circumstances:

**Consent** - We will share your Personal Information with others when we have your consent to do so.

**Service Providers** - We provide Personal Information to related companies and other trusted businesses or persons who use, analyze, or process it on our behalf, based on our instructions and in compliance with appropriate confidentiality and security measures. For example, we may use others to:

- deliver, evaluate the effectiveness of, and assist in improving our products and services;
- conduct consumer research and satisfaction surveys;
- assist us in analyzing and understanding consumers and how to reach them more effectively;

- assist us in fraud prevention, with our security measures, and to provide us technical support;
- provide member support;
- manage member data, and to ensure data integrity and accuracy;
- process financial transactions and perform accounting functions; and
- advertise, market, or make product or service offerings.

Legal Reasons - We will share Personal Information with others if we have a good-faith belief that disclosure is necessary or appropriate to:

- comply with applicable law, regulation, legal process or enforceable governmental request;
- protect our operations or members;
- detect, investigate, or address fraud, security, or technical problems; or
- investigate potential violations of and enforce applicable terms of service.

In the event of a reorganization, merger, or sale we may transfer any and all personal information we collect to the relevant third party.

### **Non-Personal Information**

We may share Non-Personal Information publicly and with our strategic partners. For example, we may share Non-Personal Information to describe the size and success of our company.

## **6. Transparency and Choice**

We may use third-party display advertising companies, including web platforms, to serve our ads on its behalf on sites across the Internet. Our display advertisers and we use cookies to inform, optimize, and serve ads based on your past visits to our website.

You may find additional information, opt-out of, or otherwise customize display advertising from web platforms by visiting the web platform's ads preference manager.

You may find additional information and opt-out of other participating third-party display advertising by visiting the [Network Advertising Initiative opt-out page](#).

We may use third-party analytics companies, such as Google Analytics, Adobe, and Omniture to analyze and understand user behavior when visiting our website.

You may find additional information and opt-out of Adobe Analytics by visiting the [Google Analytics opt-out browser add-on](#).

You may find additional information and opt-out of Omniture Analytics by visiting the [Adobe opt-out page](#).

You also may disable cookies within your browser. Please note, however, that certain features of the SDL Consulting Firm website will not function properly or be available once cookies are disabled.

## **7. Social Media Plug-ins**

Plug-ins for social networks, such as Facebook, Twitter, LinkedIn, Yahoo, Windows and Google plus (among others), are integrated on SDL Consulting Firm's website.

By interacting with us through a social media plug-in, certain information will be transmitted to the related social network, and you permit us to have on-going access to information from your social network profile.

If you do not want the social network to collect information about you, or to share it with the SDL Consulting Firm and other third parties, please review the privacy policy of the relevant social network and/or log out of the relevant social network before you visit our site.

## **8. Information Security and Retention**

We take precautions to safeguard your Personal Information from loss, theft, and misuse, as well as unauthorized access, disclosure, alteration, and destruction. These precautions include technical, physical, and administrative procedures.

We regularly review our compliance with our Privacy Policy and enforce internal safeguards.

We are committed to working with appropriate regulatory authorities to resolve any complaints regarding the transfer of Personal Information that we cannot resolve with you directly.

We use Secure Sockets Layer (SSL) encryption on all pages where Personal Information is collected. This protects the confidentiality of your Personal Information while it is transmitted over the Internet.

For your own protection, you should exercise care with the information you share over the Internet. You should always use a secure browser and exercise good judgment in using passwords, such as using a combination of upper and lower case letters, numbers, special characters, and you should avoid using the same or similar passwords across multiple sites. We recommend using a password between 12 and 16 characters long.

You may access your Personal Information by logging into your account. We make good-faith efforts to give you ways to update or to delete your Personal Information quickly, unless we need to keep that information for a legitimate business or legal purpose. Some changes require personal contact with an assigned SDL Consulting Firm representative.

We retain Personal Information and Non-Personal Information for the time necessary and reasonable to fulfill the purposes outlined in the Privacy Policy, unless a longer retention period is required or permitted by law or ethical duties, including our duty to preserve case files for a reasonable time and relevant information necessary to preserve a legal claim or defense. Our data retention for such information is seven (7) years.

We may reject requests to change or delete information that are unreasonably repetitive, require disproportionate technical effort (for example, requiring the development of new systems or fundamental changes to existing systems), risk the privacy of others, or would be extremely impractical (such as information stored on backups).

We work to protect data from accidental or malicious destruction. Accordingly, we may not immediately delete or change residual copies and we may not delete or change information from our backup systems. Unless a disproportionate effort is required, we will provide information access and correction without charge.

## **9. Third Party Privacy Policies**

This Privacy Policy only addresses the use and disclosure of information we collect from you. This policy does not apply to the practices of companies that we do not own or control or to people that we do not employ or manage. We do not control the privacy policies of third parties, and you are subject to the privacy policies of those third parties where applicable. We encourage you to ask questions before you disclose your personal information to others. For more information about each such third party, please refer to the third party's privacy policy.

If you provided your information on the website of an entity not related to the SDL Consulting Firm, and that entity shared your information with us, the privacy policy of that website governs the non-related entity's use of your information, which may be different from this policy.

## **10. Children**

We do not knowingly collect Personal Information from children under 13. If we learn that we have collected the personal information of a child under 13, we will take steps to delete the Personal Information as soon as possible.

## **11. Privacy Policy Changes and Questions**

We may update our Privacy Policy from time to time. Changes to this Privacy Policy will be posted on our website, with a corresponding revision date. Please check the website and Online Ads each time you use them for the most current information and to ensure that you are aware of any updates.

## **12. Request for Information**

If you have any questions or concerns about our Privacy Policy, please contact us: [shinika.lambert@sdlconsultingfirm.com](mailto:shinika.lambert@sdlconsultingfirm.com)