

ITASCA PRIVACY POLICY
Last modified October 1, 2023

ATTENTION: PLEASE READ THIS ITASCA PRIVACY POLICY (“PRIVACY POLICY”), WHICH IS PART OF THE ITASCA TERMS OF USE (“TERMS OF USE”), CAREFULLY. THIS PRIVACY POLICY PERTAINS TO YOUR ACCESSING, DOWNLOADING, OR USING THE [HTTPS://WWW.ITASCACG.COM](https://www.itascacg.com), [HTTPS://WWW.ITASCASOFTWARE.COM](https://www.itascasoftware.com), and [HTTPS://WWW.ITASCAINTERNATIONAL.COM](https://www.itascainternational.com) WEBSITES (THE “WEBSITES”) AND YOUR ACCESSING ANY ASSOCIATED CONTENT, SUCH AS EMAIL FEEDS OR OTHER RELATED SERVICES PROVIDED BY ITASCA, INCLUDING THE SOFTWARE SERVICES AND RELATED LICENSES (THE “SOFTWARE”), INCLUDING ALL CONTENT AVAILABLE THROUGH THE WEBSITE OR THE SOFTWARE (TOGETHER THE “SERVICE”). IF YOU HAVE RIGHTS UNDER THE E.U. GENERAL DATA PROTECTION REGULATION, PLEASE SEE THE [GDPR SUPPLEMENT](#) BELOW. IF YOU HAVE RIGHTS UNDER THE CALIFORNIA CONSUMER PRIVACY ACT, PLEASE SEE THE [CCPA SUPPLEMENT](#) BELOW.

The Service is operated by Itasca Consulting Group, Inc., 111 3rd Avenue South, Suite 450, Minneapolis, MN 55401 (“We,” or “Itasca”). This Privacy Policy describes the information collected through your (“Your”) use of the Service, how We use it, how We share it, how We protect it, and the choices You can make about Your information.

ATTENTION: PLEASE READ OUR PRIVACY POLICY CAREFULLY BEFORE ACCESSING OR USING THE SERVICE. ACCESSING OR USING THE SERVICE INDICATES THAT YOU ACCEPT AND AGREE TO BE BOUND BY THIS PRIVACY POLICY IN FULL. IF YOU DO NOT ACCEPT THIS PRIVACY POLICY, DO NOT ACCESS OR USE THE SERVICE. You acknowledge (a) that You have read and understood this Privacy Policy; (b) that this Privacy Policy shall have the same force and effect as a signed agreement; and (c) that by agreeing to this Privacy Policy, You consent to receive notifications regarding security incidents to the email address We have on file for You.

Unless explicitly stated otherwise, any new features that augment or enhance the current Service shall be subject to this Privacy Policy.

If We materially change this Privacy Policy, We will let You know by showing it to You again when You access the Service and sending an email notifying You of the changes to the email address We have on file for You.

I. Information We Collect

We collect information from You when You use the Service, contact or interact with us, and voluntarily provide us with Your comments and other content in connection with using the Service.

- **When You use the Website to contact a consultant**, We may collect Your name, job title, organization name, country, email address, work telephone number, IP address, industry, Your preference regarding the Itasca office You would like to contact You, and any information You voluntarily provide.
- **When You use the Website to submit a software technical request support form**, We may collect the name of the software, as well as Your name, email address, organization name, work telephone number, IP address, support product, software version, information related to demo

versions, the country for support, operating system, information related to Windows administrator privileges, information related to network keys, information related to the help topic, and any information You may voluntarily provide.

- **When You use the Website to request a software quote**, We may collect Your country, salutation, name, job title, organization type, organization name, department/division, address, email address, IP address, telephone number, industry, information related to the Itasca software product(s) in which You are interested, information related to promotional discount codes, and any other information You voluntarily provide.
- **When You use the Website to request free software or demonstration software**, We collect Your name, country, email address, and information related to the Software requested. We may collect the name of Your organization, Your job title, and Your industry.
- **When You submit a Software order form**, We collect licensee information (including organization name, type, and service, department, title, name, email address, street address, city, state, postal code, country, telephone number, and fax number), shipping information (including organization name, department, title, name, email address, street address, city, state, postal code, country, telephone number, and fax number), billing information (including organization name, department, title, name, email address, street address, city, state, postal code, country, telephone number, and fax number), information related to the items ordered, information related to payment or billing method (including credit card details), and Your name and signature.
- **When You use the Website to find the Itasca office or reseller** that serves as Your point of contact for software sales information, technical support, and other services and general inquiries, We collect Your location by country.
- **When You register for training**, We collect the course title, location, date, participant information (including Your name, email address, address, billing address, and organization name), information related to course options and pricing, and payment information.
- **When You use the Website to inquire about a customized software training course**, We may collect Your name, organization name, country, email address, work telephone number, industry, preferred course location, information related to the Itasca software product(s) in which You are interested, the number of participants You anticipate attending the training course, information related to Your training needs, and any other information You voluntarily provide.
- **When You use the Website to inquire about a customized engineering training course**, We may collect Your name, organization, the country in which the course will be held, email address, work telephone number, industry, preferred course location, information related to the Itasca office You would like to conduct the training course, the number of participants You anticipate attending the training course, information related to the topics or goals You would like to see for this training course, and any other information You voluntarily provide.

- **When You submit an application for the Itasca Education Program**, We collect applicant information (including name, university, address, personal email address, university email address, information related to the degree in progress, expected graduation date, and project proposal title), information related to Your software request, information related to mentorship (including whether there is a member of Itasca staff You would like to request as a mentor, their name, and office), information contained within Your curriculum vitae (CV), information related to Your project proposal (including a summary of Your research project, a detailed proposal of how the IEP Research program will aid in the completion of Your research, and references supporting Your proposed research), Your signature, and information related to the Faculty Member sponsoring the software loan (including name, department, title, email address, and signature).
- **When You execute an IEP Teaching Agreement**, We collect information related to professors (including name, title, signature, email address, telephone number, software, version, current license/serial number, and number of teaching licenses desired), licensees, if different from professors (including university, address, name, title, and signature), and software licensing information (including office providing, contact, software, number of web licenses, start date, end date, and license and key numbers).
- **When You use the Website to sign up for eNews**, We collect Your name, country, and email address.
- **When You use the Website**, We collect information related to who has logged in and the time of login.
- **When You submit an application for employment through the Website**, We collect the information contained in Your CV or resume, and any other information You voluntarily provide, including information contained in Your correspondence with us related to employment opportunities or applications.
- **When You sign into the Software with a web license on a computer connected to the internet**, We collect Your email and password.
- **When the Software starts up, if You are connected to the internet**, We collect IP address, the time and date of the request, the type of resource collected, the URL of the requested resources (which indicates the name, major version, and subversion of the program that initiated the resource requested), the protocol of the request (and the version of the protocol), the result code of the request, and the size of the data transmitted by the request, if successful.
- **When You use the Software to submit a technical support request**, We may collect the sales office or reseller responsible for providing technical support for the license, the software product name and complete version number, license number, operating system name and version number for the computer running the software, Your name, phone number, email address, company or institution name, a description of Your problem, communication type identifier, Your program bundle (Your project file plus data file), and any other information You voluntarily provide (including file attachments).

- **When You use the Software to provide feedback**, We may collect Your email address, Your rating of the documentation page, Your comments on the documentation page, and information related to whether You would like to receive notification by email if the feedback is addressed.
- **When You create an account to purchase or manage a Software subscription**, We and our Merchant of Record, FastSpring, collect your name, email address, company, city, state/province, country, and IP address. We may collect Your telephone number.
- **When You create an account to use or manage a web license or use the Software through the Internet**, We collect Your name, email address, company, city, state/province, and country. We may collect Your telephone number and office/department.
- **When You operate the Software via web license or use the Software through the Internet**, We may collect Your account name, email address, action performed in the Software, the name and version of the Software in use, the network name of the computer running the Software, the username of the user logged in to the computer running the Software, the IP address of the device or computer transmitting the action to the Software license database, the time the current action was performed and the elapsed time since the action was performed, and the internal serial number of the license in use.
- **When You access a user account** (which permits access to restricted pages that are not open to the general public, and are thus accessible by only Itasca staff, Itasca software resellers, and a limited number of designated clients), We may collect username, name, email address, company, permissions (including what parts of the Website users can view and/or modify), and user activity (including last time logged in and activity related to content creation).

You may use some portions of the Website without providing any personal information, though We automatically collect information regarding each user of our Website, including Your IP address, the domain name of Your Internet service provider, the Website features You use and the time of Your use, Your device information (e.g., device model and operating system version), and aggregated information that cannot be used to specifically identify You when You use the Website. Additional information collected is described in the **Analytics** and **Cookies** sections below.

We may combine all of the information We collect from or about You and use it in the manner described in this Privacy Policy.

II. How We Use Your Information

We use the information that We collect for several purposes, including:

- The purposes for which You provided it.
- To facilitate web license user account creation and software operation via web license.
- To provide information and services to You, including technical assistance, software quotes, software trainings, demonstrations, tutorials, webinars, and user defined constitutive models.
- To collect and process applications for research programs.
- To collect and process applications for employment.
- To facilitate program registration.

- To provide third-party reviews, conduct independent assessments, and provide due diligence independent reviews and litigation support.
- To process and respond to Your inquiries and comments.
- To collect payment information (for credit card payments, Your information will be used to submit Your payment information to our payment processor).
- To facilitate advertising.
- To administer, operate, and improve the Service.
- To personalize and enhance Your experience using the Service.
- To send periodic emails. If You choose, the email address You provide may be used to send You occasional news, updates, related product or service information, etc. Note: If at any time You would like to unsubscribe from receiving future emails, We include detailed unsubscribe instructions at the bottom of each email.
- To generate and review reports and data about our user base and Service usage patterns.
- To analyze the accuracy, effectiveness, usability, or popularity of the Service.
- To compile aggregate data for internal and external business purposes.
- To prevent fraud and abuse of the Service and to otherwise protect users and visitors and our business.
- To assist law enforcement and respond to subpoenas.
- To perform other business activities as needed, or as described elsewhere in this Privacy Policy.
- As explained elsewhere in this Privacy Policy, personal information We collect may be processed by our partners in providing services related to the Service (such as administration services, technical services relating to the maintenance, servicing, and upgrading of software, hosting services, customer service, data migration services, and analytical services, among others).

III. How Your Information is Disclosed

Information may be disclosed to third parties in accordance with our Privacy Policy. Please note that a user may choose not to share certain information as described in the **Analytics** section below.

A. Third Party Service Providers and Business Partners. We may use third-party service providers and business partners to perform functions in connection with the Service, such as marketing, website hosting, site analytics, relationship management, functions related to analyzing and improving the Service usefulness, reliability, user experience, and operation, storing data, and as otherwise described in this Privacy Policy. We also may share Your personal information with these providers and partners for their promotional purposes and so they can provide services to You.

- **FastSpring.** We use FastSpring as our Merchant of Record for subscription sales. We, and FastSpring, collect your name, email address, company, city, state/province, country, and IP address. We may collect Your telephone number. By clicking on the Add To Cart and/or Buy Now button on the Website, you will be automatically transported to the FastSpring Storefront. For more information about the information FastSpring collects, please visit: <https://fastspring.com/privacy/>.

- **WordPress.** We use WordPress to deliver GDPR cookie notifications and to manage content. WordPress may collect Your username, first name, last name, email address, the date and time when you register Your account, Your last login, account status (i.e., active, suspended), company, information related to UK users (including UK software products licensed, UK subscription license(s), and

subscription expiration), and information related to permissions (including the user groups to which You are assigned and Website permissions). WordPress additionally collects information entered into online webforms through the Service, including those required to contact a consultant, request a customized consulting course, request a customized software course, submit an extended abstract, submit a feedback form, contact us, request a free software demonstration, request a software quote, and request software technical support. For more information about the information WordPress collects, please visit: <https://wordpress.org/about/privacy/>.

- **Craft CMS.** We use Craft CMS to deliver GDPR cookie notifications and to manage content. Craft CMS may collect Your username, first name, last name, email address, the date and time when You registered Your account, Your last login, account status (i.e., active, suspended), company, information related to UK users (including UK software products licensed, UK subscription license(s), and subscription expiration), and information related to permissions (including the user groups to which You are assigned and Website permissions). Craft CMS additionally collects information entered into online webforms through the Service, including those required to contact a consultant, request a customized consulting course, request a customized software course, submit an extended abstract, submit a feedback form, contact us, request a free software demonstration, request a software quote, and request software technical support. For more information about the information Craft CMS collects, please visit: <https://craftcms.com/privacy>.

- **Google Ad Manager.** We may use Google Ad Manager, formerly known as DoubleClick, for advertising. When You visit the Website, a cookie may be placed on Your browser. These cookies allow Google and its partners to serve ads based on Your visits to both the Website and other websites. In addition to cookie IDs, Google Ad Manager may also collect IP address, the URL of the webpage being visited, and information related to traffic on the Website. You can opt out of personalized advertising by visiting Google Ad Settings. You can opt out of personalized advertising through a third-party vendor's use of cookies by visiting www.aboutads.info. For more information, please visit the Google privacy policy at: <https://policies.google.com/privacy?hl=en-US>.

- **Google Ads.** We may use Google Ads, formerly known as Google AdWords, to display advertising. Google Ads may collect information related to online identifiers (including cookie identifiers, IP addresses, and device identifiers) and client identifiers. For more information, please visit the Google privacy policy at: <https://policies.google.com/privacy?hl=en-US>.

- **Facebook.** By clicking on the Facebook button on the Website, You will be automatically transported to the official Facebook Page for Itasca, <https://www.facebook.com/itascacg>.

- **LinkedIn.** By clicking on the LinkedIn button on the Website, You will be automatically transported to the official LinkedIn Page for Itasca, <https://www.linkedin.com/company/itasca-consulting-group-inc->.

- **MailChimp.** We use MailChimp to send newsletters and to conduct targeted marketing campaigns. MailChimp may collect Your name, email address, mailing address, contact rating, information related to email marketing choices (i.e., subscribed, unsubscribed, etc.), information related to source (i.e., API-generic, API website), data added, last changed, and information related to campaigns (including open rate number and percentage, click rate number and percentage, bounced, unsubscribes, complaints, click performance, click map, i.e., a visual indication of where users clicked on the message, links clicked, subscribers with the most opens, top locations by opens, and top domain

performance). For more information, please visit MailChimp's privacy policy: <https://mailchimp.com/legal/privacy/>.

- **Twitter.** By clicking on the Twitter button on the Website, You will be automatically transported to the official Twitter Feed for Itasca, @itascacg, <https://twitter.com/itascacg/>.
- **YouTube.** We host videos on YouTube that are embedded in the Website. These videos are hosted on our account, viewable at: <https://www.youtube.com/user/itascacg?feature=watch>. When You view the videos on the Website, or click on the YouTube button on the Website, YouTube may collect information related to location, browser and device information, websites visited, queries searched, ads viewed, and videos watched, in addition to usernames and other account information. For more information, please visit Google's privacy policy at: <https://policies.google.com/privacy?hl=en-US>.

B. Payment Processing. We do not store credit card details in our database. All credit card payments are processed by FastSpring and/or Stripe. For more information on their respective Privacy Policies, please visit [Privacy Policy \(stripe.com\)](#) and [FastSpring Privacy Policy - FastSpring](#).

C. Other Web License Users. Some information collected pursuant to web license user creation may be visible to other users of the license or licenses for which the user is authorized.

D. Business Changes. If We become involved in a merger, acquisition, sale of assets, joint venture, securities offering, bankruptcy, reorganization, liquidation, dissolution, or other transaction, or if the ownership of all or substantially all of our business otherwise changes, We may transfer Your information to a third party or parties in connection therewith.

E. Affiliates. We may also share Your information with our affiliates for purposes consistent with this Privacy Policy. Our affiliates will be required to maintain that information in accordance with this Privacy Policy.

F. Investigations and Law. We may disclose information about You to third parties if We believe that such disclosure is necessary to:

- Comply with the law or guidance or cooperate with government or law enforcement officials or private parties.
- Investigate, prevent, or take action regarding suspected illegal activities, suspected fraud, the rights, reputation, safety, and property of us, users, or others, or violations of our policies or other agreements with us.
- Respond to claims and legal process (for example, subpoenas).
- Protect against legal liability.

G. Aggregated Information. We may share aggregated information relating to users of the Service with affiliated or unaffiliated third parties. This aggregated information does not contain personal information about any user.

H. Analytics.

We use Google Analytics to better understand who is using the Service and how people are using it. Google Analytics uses cookies to collect and store information, such as Service pages visited, places where users click, time spent on each Service page, Internet Protocol address, type of operating system used, screen resolution, language preference, location-based data, device ID, search traffic, gender, and age. We use this information to improve the Service and as otherwise described in this Privacy Policy. Please see: <https://policies.google.com/technologies/partner-sites> for information about how Google Analytics uses this information, and visit: <https://tools.google.com/dlpage/gaoptout> for information about the Google Analytics Opt-out Browser Add-on. Google may track activity over time and across websites.

We may deliver advertisements to You, including through the use of Google Analytics Advertising Features. We may also work with third-party advertising companies that help deliver these advertisements. To learn more about third-party online advertising and to opt out of certain types of advertising, please see: <http://optout.networkadvertising.org/?c=1>.

I. Cookies and Other Tracking Technologies

We, along with third parties, use cookies, local storage objects, Web beacons, and other technologies. These technologies are used for tracking, analytics, and personalization and optimization of the Service.

Cookies are small files that are transferred to and stored on Your computer through Your Web browser (if You allow it) that enable the website's or service provider's system to recognize Your browser and capture and remember certain information. You can instruct Your browser to stop accepting cookies. But, if You do not accept cookies, You may not be able to use all portions of all functionality of the Website.

- Persistent cookies remain on the visitor's computer after the browser has been closed.
- Session cookies exist only during a visitor's online session and disappear from the visitor's computer when he/she closes the browser software.

Web beacons are small strings of code that provide a method for delivering a graphic image on a web page or in an email message for the purpose of transferring data. You can disable the ability of web beacons to capture information by blocking cookies.

We use cookies and other tracking technologies to help us understand and save Your preferences and interests, so We can personalize Your future visits and compile aggregate data about Service traffic and Service interaction to offer better Service experiences and tools in the future.

Some of our business partners, such as our analytics providers and advertising networks, also use cookies and other tracking technologies on our Website, some of which may track users across websites and over time.

IV. Security

We implement a variety of security measures to protect the safety of Your personal information when You enter, submit, or access Your personal information. Please keep Your account password secure to help ensure the safety of Your personal information.

While We take reasonable measures to protect the information You submit via the Service against loss, theft, and unauthorized use, disclosure, or modification, We cannot guarantee its absolute security. No Internet, email, or mobile application transmission is ever fully secure or error free. Email or other messages sent through the Service may not be secure. You should use caution whenever submitting information through the Service and take special care in deciding with which information You provide us.

We cannot guarantee that transmissions of Your personal information will be fully secure and that third parties will never be able to defeat our security measures or the security measures of our partners. WE ASSUME NO LIABILITY FOR DISCLOSURE OF YOUR INFORMATION DUE TO TRANSMISSION ERRORS, THIRD-PARTY ACCESS, OR CAUSES BEYOND OUR CONTROL.

Any information collected through the Service is stored and processed in the United States. If you use the Service outside of the United States, You consent to having Your data transferred to the United States.

V. Data Retention Policy, Managing Your Information

We will retain Your information for as long as You use the Service and for a reasonable time thereafter. We may maintain anonymized or aggregated data, including usage data, for analytics purposes. We may retain and use Your information as necessary to comply with our legal obligations, resolve disputes, and/or for the period required by laws in applicable jurisdictions. Please note that some or all of the information We have collected may be required for the Service to function properly.

VI. Links to Other Websites or Applications

This Privacy Policy applies only to the Service. The Service may contain links to other websites or apps or may forward users to other websites or apps that We may not own or operate and to which this Privacy Policy does not apply. The links from the Service do not imply that We endorse or have reviewed these websites or apps. The policies and procedures We describe here do not apply to these websites or apps. We neither can control nor are responsible for the privacy practices or content of these websites or apps. We suggest contacting these websites or app providers directly for information on their privacy policies. Nonetheless, We seek to protect the integrity of the Service and welcome any feedback about these linked websites and mobile applications.

VII. Your Choices Regarding Your Information

You have choices regarding the use of information by the Service.

- **Changing Your Information** – To change Your information, You may contact us at privacy@itascacg.com.

- **Closing Your Account** - You may close Your account by contacting us at privacy@itascacg.com. If the email account associated with Your email address is not active, We may close Your account without notice.

VIII. Information Collected From Other Websites and Mobile Applications and Do Not Track Policy

Your browser or device may offer You a “Do Not Track” option, which allows You to signal to operators of websites, web applications, mobile applications, and services (including behavioral advertising services) that You do not wish such operators to track certain of Your online activities over time and/or across different websites or applications. The Service does not support Do Not Track requests at this time, which means that We or our analytics providers or other third parties with which We are working may collect information about Your online activity both during and after Your use of the Service.

IX. Children

The Service is not intended for children under 18 years of age. We do not knowingly collect personal information from an individual under age 18. If You are under the age of 18, please do not submit any personal information through the Service. If You have reason to believe that We may have accidentally received personal information from an individual under age 18, please contact us immediately at privacy@itascacg.com.

X. Changes to Privacy Policy

We reserve the right to update or modify this Privacy Policy at any time and from time to time without prior notice. Please review this Privacy Policy periodically, and especially before You provide any information. This Privacy Policy was made effective on the date indicated above.

XI. How to Contact Us

Please feel free to contact us by email at privacy@itascacg.com, or by writing us at Itasca Consulting Group, Inc., 111 3rd Avenue South, Suite 450, Minneapolis, MN 55401, if You have any questions about this Privacy Policy.

XII. Your California Privacy Rights

Section 1798.83 of the California Civil Code permits California residents to request from a business, with whom the California resident has an established business relationship, certain information about the types of personal information the business has shared with third parties for those third parties’ direct marketing purposes, and the names and addresses of the third parties with whom the business has shared such information during the immediately preceding calendar year. You may make one request each year by emailing us at privacy@itascacg.com, or by writing us at Itasca, 111 3rd Avenue South, Suite 450, Minneapolis, MN 55401.

XIII. Your Nevada Privacy Rights

Senate Bill No. 220 (May 29, 2019) amends Chapter 603A of the Nevada Revised Statutes to permit a Nevada consumer to direct an operator of an Internet website or online service to refrain from making any sale of any covered information the operator has collected or will collect about that consumer. You

may submit a request pursuant to this directive by emailing us at privacy@itascacg.com. We will provide further information about how We verify the authenticity of the request and Your identity.

EU GDPR Supplement

PRIVACY POLICY / POLICY OF PROTECTION OF PERSONAL DATA

Conscious of the importance of the protection of personal data, ITASCA CONSULTING GROUP makes strong commitments and measures to protect the personal data of its customers.

The purpose of this policy is to inform you about how ITASCA CONSULTING GROUP processes your personal data.

1 – DEFINITIONS

- Personal data / Personal Data / Data means any information relating to a natural person that identifies or makes it identifiable, directly or indirectly, in particular by reference to an identifier, such as a name, a number of identification, location data, an online identifier, or one or more specific elements specific to its physical, physiological, genetic, psychic, economic, cultural or social identity;
- Regulation means the general regulation on the protection of PERSONAL DATA (EU) 2016/679 (hereinafter GDPR).

2 - GENERAL DESCRIPTION OF THE DATA PROCESSING

The company ITASCA CONSULTING GROUP sees as data controller to collect only the data strictly necessary for the purpose for which they are processed.

The data we are likely to collect are as follows:

- Names.
- First names.
- Emails.
- IP address.

3 - PURPOSES OF TREATMENT

The purposes and the legal basis of the treatments are indicated below:

- The implementation of pre-contractual measures and the conclusion of the contract (execution of the contract).
- The supply of the service requested by the client (execution of the contract).
- Technical assistance under the contract (performance of the contract).
- Follow-up of the customer relationship, including sending emails (execution of the contract).
- Sending a newsletter (legitimate interest of the controller).

The Personal Data processed will be stored by ITASCA CONSULTING GROUP and under its responsibility.

4 - DATA RECIPIENTS

Only ITASCA CONSULTING GROUP and its subsidiaries are recipients of the data. ITASCA CONSULTING GROUP does not share or transfer your personal data with other third parties.

5 - DURATION OF DATA CONSERVATION

Customer data is retained for 5 years after the end of the business relationship. Data relating to a non-client prospect is kept for a period of 3 years from their collection or the last contact from the prospect.

6 - SECURITY OF TREATMENTS

We ensure the security of your data by putting in place measures useful to preserve in optimal conditions their security, their confidentiality as well as their integrity. Only authorized persons within ITASCA CONSULTING GROUP have access to your data. We do not allow any unauthorized third party to have access to it, apart from our legal obligations. Finally, we do not perform any further processing of your personal data.

7 - YOUR RIGHTS

In accordance with the Regulations in force, you have the right of access, rectification, opposition and in case of legitimate reasons for deletion, limitation of the processing of your data. You also have the right to the portability of your data and the right to withdraw your consent to the processing of your data. You can exercise these rights or ask your questions by writing to the following address privacy@itascacg.com. If you are not satisfied with the processing of your data or the exercise of your rights, you have the opportunity to contact your supervising authority.

8 - TRANSFERS OF DATA OUTSIDE THE EUROPEAN UNION

ITASCA CONSULTING GROUP, as a member of the ITASCA INTERNATIONAL Inc. group, may transfer some of your data to entities outside the European Union, including the United States. In any case, the company ITASCA CONSULTING GROUP undertakes to transfer your data to entities with sufficient guarantees as to the protection of Personal Data through the implementation of binding corporate rules (BCR) or standard contractual clauses approved by the European Commission. You can consult these documents by sending your request to privacy@itasca.fr.

9 - USE OF COOKIES

Through its website, the ITASCA group may use cookies. To learn more about our cookies policy, click on this link: <https://www.itascacg.com/about/legal/cookie-policy>.

CCPA Supplement for California Residents

California residents have the right to:

- Request that We disclose, free of charge (unless Your requests are manifestly unfounded or excessive), the categories and specific pieces of personal information that We have collected in the preceding 12 months. To exercise this right, You must provide a verifiable consumer request by either calling us at 612-371-4711, or by emailing us at privacy@itascacg.com.

- Request that We delete personal information about You that We may have collected. To exercise this right, You must provide a verifiable consumer request by either calling us at 612-371-4711, or by emailing us at privacy@itascacg.com.
- Request that, for personal information that We have collected in the preceding 12 months, We disclose, free of charge (unless Your requests are manifestly unfounded or excessive), the categories of personal information that We have collected about You, the categories of sources from which the personal information was collected, the business or commercial purpose for collecting or selling personal information, the categories of third parties with whom We share personal information, and the specific pieces of personal information We have collected about You. To exercise this right, You must provide a verifiable consumer request by either calling us at 612-371-4711, or by emailing us at privacy@itascacg.com.
- Request that, for personal information that We have sold or disclosed for a business purpose in the preceding 12 months, We disclose, free of charge (unless Your requests are manifestly unfounded or excessive), the categories of personal information that We have collected about You, the categories of personal information that We have sold about You, the categories of third parties to whom the personal information was sold (by category or categories of personal information for each category of third parties to whom the personal information was sold), the categories of personal information that We have disclosed about You for a business purpose, and the categories of third parties to whom the personal information was disclosed for a business purpose. To exercise this right, You must provide a verifiable consumer request by either calling us at 612-371-4711, or by emailing us at privacy@itascacg.com.
- Direct us, at any time, not to sell Your personal information. We may sell Your personal information within the meaning of the California Consumer Privacy Act of 2018 (“**CCPA**”). Under the CCPA, “sell” means sell, rent, release, disclose, disseminate, make available, transfer, or otherwise communicate orally, in writing, or by electronic or other means a consumer’s personal information by the business to another business or a third party for monetary or other valuable consideration. The law contains exceptions to this definition which may limit how We respond to your direction. To exercise this right to opt out, You may call us at 612-371-4711, or email us at privacy@itascacg.com. You may also go to our Do Not Sell My Personal Information site at: <https://www.itascacg.com/about/legal/do-not-sell-my-personal-information>. You will not need to create an account to exercise this right.
- Affirmatively authorize us to sell Your personal information if You are between 13 and 16 years of age. Notwithstanding the above right to direct us not to sell Your personal information, We cannot sell your personal information, if You are between 13 and 16 years of age, unless You have affirmatively authorized the sale of Your personal information. To exercise this right to opt in, You will not need to create an account.

We may not discriminate against You because You exercised any of Your rights under the CCPA, including, but not limited to, by:

- (A) Denying goods or services to You.
- (B) Charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties.
- (C) Providing a different level or quality of goods or services to You.

(D) Suggesting that You will receive a different price or rate for goods or services or a different level or quality of goods or services.

However, nothing prohibits us from charging You a different price or rate, or from providing a different level or quality of goods or services to You, if that difference is reasonably related to the value provided to us by Your data.

We may offer financial incentives, including payments to You as compensation, for the collection of personal information, the sale of personal information, or the deletion of personal information. We may also offer a different price, rate, level, or quality of goods or services to You if that price or difference is directly related to the value provided to us by Your data.

To the extent that anything in this Supplement for California Residents conflicts with the Privacy Policy, this Supplement for California Residents shall govern.

Categories of personal information collected in last 12 months	Purposes for which personal information will be used
Identifiers such as real name, postal address, unique personal identifier, online identifier, IP address, email address, account name, social security number, username, and password	Processing or fulfilling orders and transactions; providing advertising or marketing services; providing analytics services; creating, maintaining, and servicing accounts; providing customer service; providing educational services; verifying customer information; processing payments; undertaking internal research for technological development and demonstration; debugging to identify and repair errors that impair existing intended functionality; undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business
Personal information such as telephone number, signature, bank account number, credit card number, debit card number, or other financial information	Processing or fulfilling orders and transactions;; creating, maintaining, and servicing accounts; providing educational services; providing customer service; verifying customer information; processing payments;; undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve,

	upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business
Commercial information, including records of products purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	Processing or fulfilling orders and transactions; providing advertising or marketing services; providing analytics services; undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business
Internet or other electronic network activity information, including browsing history, search history, information regarding your interaction with an Internet website, application, or advertisement, and information regarding your browser, device, and operating system	Processing or fulfilling orders and transactions; providing advertising or marketing services; providing analytics services; creating, maintaining, and servicing accounts; providing educational services; providing customer service; verifying customer information; undertaking internal research for technological development and demonstration; debugging to identify and repair errors that impair existing intended functionality; undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business
Geolocation Information	Providing advertising or marketing services; providing analytics services; undertaking internal research for technological development and demonstration; validating location to comply with export restrictions
Professional or employment-related information	Processing or fulfilling orders and transactions; providing advertising or marketing services; providing analytics services; creating, maintaining, and servicing accounts; providing educational services; providing customer service; verifying customer information; processing payments;

	undertaking internal research for technological development and demonstration; debugging to identify and repair errors that impair existing intended functionality; undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business; collecting and processing job applications
Education Information	Collecting and processing research program applications
Inferences drawn from your personal information to create a profile reflecting your preferences, characteristics, predispositions, behavior, etc.	Providing advertising or marketing services; providing analytics services

Categories of sources from which personal information is collected
Consumers
Content Management Systems
Marketing Automation Platforms and Email Marketing Services
Payment processors

Categories of third parties with which We share personal information
Advertising/Marketing Providers
Affiliates
Analytics Providers
Content Management System Providers

Other License Users
Payment Processors
Social Media Platforms
Third-Party Plug-in Providers
Video Hosting Companies

Categories of personal information that We have disclosed for business purposes in last 12 months
Identifiers such as real name, postal address, unique personal identifier, online identifier, IP address, email address, account name, username, and password
Commercial information, including records of products purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
Internet or other electronic network activity information, including browsing history, search history, information regarding your interaction with an Internet website, application, or advertisement, and information regarding your browser, device, and operating system
Geolocation Information
Inferences drawn from your personal information to create a profile reflecting your preferences, characteristics, predispositions, behavior, etc.
Professional or employment-related information

Categories of personal information that We have sold in last 12 months
None