

## Privacy Notice

Effective date: October 20, 2022

Our privacy notice is available in [PDF form here](#).

EdgeUBadges.com Edge•U Badges is an online, micro-credentialing platform for educators located at [www.edgeubadges.com](http://www.edgeubadges.com). EdgeUBadges.com is owned and operated by Forward Edge, LLC. At Forward Edge, LLC, we respect your privacy and are committed to protecting it.

This notice covers information we collect from or about you when you visit EdgeUBadges.com (the “website”) or give it to us through the website. It also covers information that we may receive from other persons or companies who have received your information and can share it with us.

If in any case our privacy practices differ from those explained in this notice, we will let you know you at the time we ask for or collect your information.

### 1. Quick links

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### 2. What information we collect

We may collect the following types of information about you, which we have grouped together as follows:

- **Identity Information.** Examples include first name, last name, and date of birth.
- **Contact Information.** Examples include physical address, email address and telephone numbers.
- **Financial Information.** If applicable, in order to collect payments on your behalf as necessary, we use Stripe as a third-party payment processor that may collect payment information from you. This information will be used solely for the purpose for which it is collected and will only be stored by Stripe. Such information will be subject to Stripe’s privacy policy, which can be located here <https://stripe.com/us/privacy>.
- **Transaction Information.** Examples include details about products and services you have used with us.

- **Technical Information.** Examples include internet protocol (IP) address, your login information, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website.
- **Profile Information.** Examples include your username and password.
- **Usage Information.** Examples include information about how you use our website, products and services.
- **Marketing and Communications Information.** Examples include how you prefer to receive communications from us. For example, we work with MailChimp to send you communication and newsletters. Each user of this site is automatically added to Mailchimp when their account is created. Every MailChimp message has an unsubscribe link. We are not responsible for MailChimp's privacy practices. To learn more about MailChimp's privacy practices, please visit <https://www.intuit.com/privacy/statement/>.
- **Position Information.** Examples include your position description, job title, district name, and school name.

Some of the information we collect about you may be personal information, or personal data, that can be used to identify you including, for example, your name, email address or mailing address. In some jurisdictions, certain unique identifiers like IP addresses and other usage or technical information may be considered personal information. Personal information does not include data where your identity has been removed so that we can no longer identify you (anonymous data), which we may use for any purpose.

### **3. Children's online privacy**

Our website is not intended for children under 13 years of age. No one under age 13 may provide any information to the website. We do not knowingly collect personal information from children under 13. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at [privacy@forward-edge.net](mailto:privacy@forward-edge.net).

### **4. How we collect your information**

We collect information from and about you in the following ways:

- **When you provide it to us.** You may give us information about you by filling in forms or by communicating with us by email or otherwise. This includes information you provide when you register for an account.
- **From our websites and emails.** As you interact with our website or our emails, we may automatically collect Technical Information about your equipment, browsing actions and patterns. We collect this information by using cookies, server logs, web beacons, and other similar technologies. Our *Cookies and automatic data collection technologies* section contains more information and options to control or opt-out of certain data collection or uses.
- **From others.** We may receive information about you from third parties including, for example, from school district administrators for our enterprise customers..

### **5. Cookies and automatic data collection technologies**

Our website uses automatic data collection technologies to distinguish you from other website users. This helps us deliver a better and more personalized service when you browse our website. It also allows us to improve our website by enabling us to:

- Estimate our audience size and usage patterns.
- Store your preferences so we may customize our website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our website.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). For more information, see the *Interest-based advertising* section of this privacy notice.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. For information about managing browser settings to refuse cookies, see *Your rights and choices*.
- **Flash Cookies.** Certain features of our website may use Flash cookies (local stored objects) instead of browser cookies to collect and store information about your preferences and navigation to, from, and on the website. For information about managing Flash cookies see *Your rights and choices*.
- **Web Beacons.** Our website pages, advertisements, and e-mails may contain small transparent embedded images or objects known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count website page visitors or email readers, or to compile other similar statistics such as recording website content popularity or verifying system and server integrity. For information about managing web beacons, see *Your rights and choices*.

Depending on which website this notice is posted on, we may use Google Analytics to provide certain analytics services for us. More information about Google Analytics can be found in the *Google Analytics Terms of Use* and the *Google Analytics Privacy Policy*.

We do not respond to or honor “do not track” (a/k/a DNT) signals or similar mechanisms transmitted by web browsers.

Our full list of cookies can be found on our cookie policy page: <https://edgeubadges.com/cookie-policy>.

## 6. How we use your information

We may use your information to conduct our business operations including for the following purposes:

- To create and manage your account.
- To provide you with products and services you request from us.
- To conduct market research.
- To develop and provide advertising tailored to your interest and to determine the effectiveness of our advertising.
- To provide you with the information or support that you request from us.

- To improve our website, products or services, marketing, customer relationships, and experiences.
- To develop new products and services.
- To notify you of updates, products, and services that we think may be of interest to you. To learn more about your choices with regards to these communications see *Your rights and choices*.
- To manage our relationship with you which may include notifying you about changes to our terms or privacy notice, providing you notices about your account, asking you to leave a review or take a survey, addressing any concerns you may have about our products or services.
- To provide you with the information, products, services or support that you request from us or to fulfill any other purpose for which you provide it.
- To deliver relevant content, advertisements, and messaging to you and to measure or understand the effectiveness of such content, advertisements, and messaging.
- To make suggestions and recommendations to you about our own and third-parties' products or services that may be of interest to you. If you do not want us to use your information in this way or for more information on how to adjust your preferences, see *Your Rights and Choices*.
- To carry out our obligations and enforce our rights and to protect our websites, customers, and other individuals including to protect against or identify possible fraudulent transactions.
- For any other purpose as may be permitted by law or that we describe when you provide the information.

We may use information that is not personal information for any purpose. For example, we may aggregate usage data from many people in a way that does not identify any individuals to calculate the percentage of users accessing a feature on the website.

## **7. Disclosure of Your Information**

We may share non-personal information without restriction. We may share your personal information with:

- Any member of our corporate group, which means our subsidiaries, affiliates, our ultimate holding company and its subsidiaries, and affiliates.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To public or government (including enforcement) authorities.
- To an actual or prospective buyer or other successor in the event of merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, where one of the transferred assets is the personal information we hold.
- To fulfill the purpose for which you provide it.
- For any other purpose as may be permitted by law or that we describe when you provide the information.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including responding to any government or regulatory request.
- To enforce any *Terms of Use* and other agreements with you.
- To protect the rights, property, or safety of our business, our employees, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of cybersecurity, fraud protection and credit risk reduction.
- To investigate suspected violations of any law, rule or regulation, or the terms or policies for our website.

We may also use your information to contact you about our own products and services that may be of interest to you. If you do not want us to use your information in this way, please see *Your rights and choices*.

## **8. Interest-based advertising**

Some content or applications on our website are served by third parties, including content partners or application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content. Our partners may use non-cookie technologies on which browser settings that block cookies might have no effect. Your browser may not permit you to block such technologies.

For this reason, keep in mind, you can block the collection and use of information related to you by advertising companies for the purpose of serving interest based advertising by visiting the following platforms of self-regulatory programs of which those companies are members:

- The NAI's opt-out platform is available [here](#).
- The DAA's opt-out platform is available [here](#).

## **9. Third Party Content, Apps, and Links**

Some content or applications on our website may be served by third parties, content providers and application providers including the following:

- a. **Plugins.** Our website makes available the option for you to use “plugins” that are operated by social media companies. If you choose to use one of these plugins, then it may collect information about you and send it back to the social media company that owns it. This may happen even if you do not click on the plugin, if you are logged into the social media website that owns the plugin when you visit our website. Information collected by a plugin is subject to the privacy policy and terms of the social media company that makes it. If you do not want the social media company who owns a plugin to collect information about you when you visit our website, sign out of the social media network before visiting. By interacting with a plugin when you are on our website (for example, clicking the Facebook “Like” button), you are intentionally transferring information to that social media company. Further, if you are logged into a social media website when you visit our website, then you are directing us to share your data with the social media company that owns the plugin.

- b. **User Content.** In the event our website may allow you to upload your own content to public areas of the website, any information you submit becomes public information, and we will not control how others may use the content you submit. We are not responsible for uses that may violate our privacy policy, the law, or your intellectual property rights.
- c. **Third-party links.** Our website may contain links to other sites, which we do not control. Those websites have their own privacy policies and terms.

## 10. Your Rights and Choices

Your rights may vary depending on where you are located. We have created mechanisms to provide you with the following control over your information.

- **Marketing.** If you do not want us to use your email address or other contact information to promote or recommend our own products and services, or third parties' products or services, you can let us know by contacting us as set forth below in the *Contact Us* section. You may also opt-out of further marketing communications by replying to any promotional email we have sent you or following the opt-out links on that message. This opt-out may not apply to information provided to us as a result of a product purchase, warranty registration, product service experience or other transactions.
- **Accessing, Updating and Deleting Your Information.** If you have an account with us, you may have the ability to access your information and make updates to or delete your data. If not, you can contact us as set forth in the *Contact Us* section below to request access to, correction of, or deletion of personal information that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or negatively affect the information's accuracy.
- **Cookies and Automatic Data Collection Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. Flash cookies are not managed by the same browser settings as are used for browser cookies. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on *Adobe's website*. However, if you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. If you do not want Google Analytics to be used in your browser, Google Analytics provides an opt-out tool which can be found *here*. In some cases, you may be able to set your browser or email program to not download web beacons.
- **Interest Based Advertising.** Please see *Interest-based advertising* above for information on how to opt-out of interest-based advertising.
- **California Residents.** If you are a California resident, you may have additional rights and choices with regard to your personal information. Please see *Your California privacy rights* for more information.
- **Nevada Residents.** If you are a Nevada resident, please see our *Nevada privacy* section below for more information our information practices.
- **Canadian Residents.** If you are a resident of Canada, please see our *Canadian privacy rights* section below for more information.
- **EU/UK Residents.** If you are a resident of the European Union or the United Kingdom, please see our *EU/UK privacy rights* section below for more information.

## **11. Data Security**

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclose the safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the website.

## **12. Your California privacy rights**

The California Consumer Privacy Act of 2018 (“CCPA”) requires us to provide the following notice to California residents.

### A. Information we collect

The information we have collected about California residents in the last 12 months is described in *What information we collect* above. That information corresponds with the following categories of personal information under the CCPA:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.  Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and	NO

	voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

In the last 12 months, we have collected personal information from the sources described in *How we collect your information* above.

#### B. Use of personal information

In the last 12 months, we have used your personal information for the business and commercial purposes described in *How we use your information* above.

#### C. Sharing of personal information

The business and commercial purposes that we have shared your personal information in the last 12 months are described above in *Disclosure of your information*. More specific information on that sharing is as follows:

- *Sharing your personal information for business purposes.* We have shared the following categories of personal information with our affiliated companies, service providers and public or government (including enforcement) authorities for our business purposes:
  - Category A: Identifiers.
  - Category B: California Customer Records personal information categories.
  - Category C: Protected classification characteristics under California or federal law.
  - Category D: Commercial information.
  - Category F: Internet or other similar network activity.
  - Category I: Professional or employment-related information.

As described above, examples of business purposes include performing transactions, registering accounts, managing our relationship with you, and monitoring for security threats and fraud.

- *Sharing your personal information for commercial or other purposes:* We have shared the following categories of your personal information with co-sponsors, business partners and other third parties in a manner that is likely to be considered to be a "sale" under the CCPA:

- Category A: Identifiers.
- Category B: California Customer Records personal information categories.
- Category C: Protected classification characteristics under California or federal law.
- Category D: Commercial information.
- Category F: Internet or other similar network activity.
- Category I: Professional or employment-related information.

As described above, this information may be shared for personalization, analytics, marketing, retargeting, and sales. We do not sell personal information of consumers we actually know are less than 16 years of age.

#### D. Your right to know

You have the right to request that we disclose certain information to you about our collection, use, disclosure, and sale of your personal information over the past 12 months. Once we verify your request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- The categories of third parties with whom we share that personal information.
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing: sales, identifying the personal information categories that each category of recipient purchased; and disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

#### E. Your right to obtain a copy of your personal information

You have a right to obtain a copy of the specific pieces of personal information we collected about you (also called a data portability request). Once we verify your request, we will provide you a copy of your personal information that is responsive to your request.

#### F. Your right to delete your personal information

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we verify your request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

#### G. Your right to opt-out of sale of your information

We do not sell our email lists or other personal information we collect about you for money. However, we may share information with third parties in a way that is considered a "sale" under the CCPA. Where that is the case, we will comply with California "Do Not Sell" requirements.

#### H. How to exercise your CCPA rights

To exercise your right to know, right to obtain a copy, or right to delete your personal information as described above, please submit your request to us by either:

Calling us at 1-513-761-3343.

Emailing us at [privacy@forward-edge.net](mailto:privacy@forward-edge.net).

To exercise the right to opt-out of sale of your personal information, you can submit a request to us by visiting the following link: <https://edgeubadges.com/privacy-request>.

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back into personal information sales at any time by visiting the following link: Opt-in to Sales of My Personal Information

#### I. How we verify requests and respond to requests

Before fulfilling your request, we take steps to verify you are who you say you are or that you have authority to act upon someone else's behalf. Therefore, upon receipt of your request, we will request additional information that we need to verify you and, if you are submitting a request on behalf of someone else, to verify that you are permitted to act on that person's behalf.

When we contact you to request verification information, please respond and provide the information that we have requested. Depending on the nature of the request you make, we may require you to verify your identity to either a reasonable degree of certainty or high degree of certainty. This may mean that we need to match two or three pieces of information that we hold about you with information that you provide to us. In some cases, we may require you to sign a declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request or that you are authorized to make the request on behalf of someone else.

In addition to providing the information we need to verify you or your authority, you must provide us with enough information so that we can understand, evaluate, and respond to your request. We cannot respond to your request or provide you with personal information if we cannot confirm the personal information relates to you.

We will only use personal information provided in a verifiable consumer request to verify your identity or authority to make the request and to locate relevant information. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and to understand, evaluate, and respond to your request.

We cannot delete personal information in those situations where our retention is required for our own internal business purposes or otherwise permitted by the CCPA (such as fraud prevention or legal compliance). In these situations, we will retain your information in accordance with our records retention program and securely delete it at the end of the retention period.

#### J. Who may submit requests?

Only you, or someone legally authorized to act on your behalf, may make a request related to your personal information. You may also make request on behalf of your minor child. You may designate an authorized agent to make a request on your behalf by registering such person or entity with the California Secretary of State.

#### K. How often you can submit requests?

You may make a CCPA consumer request twice within a 12-month period.

#### L. Response timing and format

We make every attempt to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time, we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. When you request a copy of your personal information, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity easily.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

#### M. Non-discrimination

We will not discriminate against you for exercising any of your CCPA rights. You have a right not to receive discriminatory treatment by us for exercising your privacy rights.

#### N. Other California privacy rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our App that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to [INSERT APPROPRIATE EMAIL ADDRESS]

### **13. Nevada privacy rights**

Nevada residents have the right to opt out of the sale of certain "covered information" collected by operators of websites or online services. We currently do not sell covered information, as "sale" is defined by such law, and we do not have plans to sell this information.

### **14. Canada privacy rights**

We comply with applicable Canadian privacy laws and regulations, including the Personal Information Protection and Electronic Documents Act (PIPEDA), in connection with processing Canadian personal information.

We will only use your personal information for the purposes described in this privacy policy unless (1) we have obtained your consent to use it for other purposes; or (2) we are otherwise permitted or required by applicable law to use it for such other purposes.

#### *A. Transferring your personal information outside of Canada*

We may transfer personal information that we collect, or that you provide, to third parties (including affiliates, service providers and others) as described in the *How We Use Your Information* and *Disclosure of Your Information* sections above.

We may process, store, and transfer your personal information in and to a foreign country, with different privacy laws that may or may not be as comprehensive as Canadian law, such as to the United States. In these circumstances, the governments, courts, law enforcement, or regulatory agencies of that country may be able to obtain access to your personal information through the laws of the foreign country.

You are welcome to contact us if you have questions regarding the collection, use, disclosure or storage of personal information by our service providers and affiliates outside Canada, and/or to obtain access to written information about our policies and practices with respect to service providers (including affiliates) outside Canada.

For questions about our privacy practices, please contact [privacy@forward-edge.net](mailto:privacy@forward-edge.net) as directed in the *Contact Us* section of this policy.

#### B. *Data Retention*

Your personal information will be kept in the United States and accessible to our employees and service providers who have a “need to know” such information for the purposes described in this privacy policy.

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal information for as long as necessary to fulfill the purposes for which we collected it, and/or for the purposes of satisfying any legal, accounting, or reporting requirements. Under some circumstances we may anonymize your personal information so that it can no longer be associated with you, either directly or indirectly, alone or in combination with any other information. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

#### C. *Accessing and correcting your personal information*

By law you have the right to request access to and to correct or rectify the personal information that we hold about you, subject to certain exceptions as required or permitted by applicable law.

You can review and change your personal information by logging into your account and visiting the pages that correspond to the information you want to review and change.

If you want to access, review, verify, correct, rectify, update, or withdraw consent to the collection, use or disclosure of your personal information you may also contact us as directed in the *Contact Us* section of this notice to make such a request.

We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal information that we hold about you or make your requested changes. Applicable law may allow or require us to refuse to provide you with access to some or all the personal information that we hold about you, or we may have destroyed, erased, or made your personal information anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal information, we will inform you of the reasons, subject to any legal or regulatory restrictions.

We will provide access to your personal information, subject to exceptions set out in applicable privacy legislation. Examples of such exceptions may include (without limitation):

- Information protected by solicitor-client privilege.
- Information that is part of a formal dispute resolution process.
- Information that would reveal the personal information or confidential commercial information of another person.
- Information that is prohibitively expensive to provide.

If you are concerned about our response or would like to correct the information provided, you may contact us as described in the *Contact Us* section of this Privacy Notice.

## **15. EU-UK Privacy Rights**

If you are in the European Union, European Economic Area, United Kingdom, or are otherwise subject to the General Data Protection Regulation, then this section of our privacy notice applies to you.

### ***a. Data controller***

The data controller of such processing is Forward Edge, LLC.

### ***b. Additional information about data we collect about you***

We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offenses.

### ***c. Lawful basis***

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into, or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests, potentially including uses such as determining the success of our services and for determining marketing performance to share relevant information and offers about our products with clients and potential clients.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you. You have the right to withdraw consent to marketing at any time by contacting us.

### ***d. Your data subject rights***

Data subjects have the right, at any time, to request access to, rectification or erasure of his/her personal data, or restriction or objection to processing, as well as the right to data portability, or to withdraw the consent given by addressing a written communication to Dr. Katie Ritter at 2724 East Kemper, Cincinnati, Ohio, United States, 45241 or by sending an e-mail to: [privacy@forward-edge.net](mailto:privacy@forward-edge.net) to the attention of the privacy officer, providing a copy of your identity document, or any document proving your identity.

We reserve the right to verify the truthfulness of personal data provided at any time.

We do not use any type of automated process for profiling purposes.

*e. Data retention*

We will only retain your personal data for as long as reasonably necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

*f. Transfer of Data*

Your personal data may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located in the EU, EEA, or UK and choose to provide information to us, please note that we transfer the data, including personal information, to United States and process it there.

Your consent to this privacy notice followed by your submission of such information represents your agreement to that transfer.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice and no transfer of your personal information will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

**16. Changes to our privacy notice**

We will post any changes we may make to our privacy notice on this page. The date the privacy notice was last revised is identified at the top of the page. You are responsible for periodically visiting our website and this page to check for any changes.

**17. Contact Us**

If you have any comments or questions about our privacy notice, please reach out to us at [privacy@forward-edge.net](mailto:privacy@forward-edge.net). You may also write to:

Dr. Katie Ritter  
2724 East Kemper Road  
Cincinnati, Ohio, United States, 45241