

PRIVACY POLICY

LAST UPDATED: October 1, 2021

Emergent Risk International, LLC (“ERI”) (“we”, “us”, “our”) takes your privacy very seriously. Please read this Privacy Policy carefully as it contains important information on who we are, how and why we collect, store, use, and share your Personal Information (this “Privacy Policy”). “Personal Information” is any information relating to an identified or identifiable natural person. This Privacy Policy also explains your rights in relation to your Personal Information and how to contact us or supervisory authorities in the event you have a complaint. This Privacy Policy applies when you access our website or its related or subsidiary web sites, when you subscribe to our services or one of our products, or otherwise interact with us (collectively, the “Services”).

We collect, use and are responsible for certain Personal Information about you. When we do so we are subject to various laws in the United States and the General Data Protection Regulation which applies across the European Union (including in the United Kingdom), and we are responsible as “controller” of that Personal Information for the purposes of those laws.

- 1. Personal Information We Collect About You.** We may collect and use the following Personal Information that identifies, relates to, describes, is reasonable capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household:

Categories of Personal Information	Specific Types of Personal Information Collected
Contact Information	We may collect identifying information such as name, contact details (email, phone number, and address), job title, company name, employer name, and any other information you choose to provide in order to communicate and facilitate the provision of our Services with you or potential clients. For example, contact details of individuals who work for or on behalf of you, in order to carry out your engagement with ERI.
Payment Information	Your credit card or other payment information may be provided to us when you subscribe to the Services or renew your subscription, but this information is stored and used solely by third-party credit card processors in order for them to process your subscription payments
Services Information	Personal Information may be provided to us by you to the extent required to perform the Services, such as company, personnel, background, physical or cyber infrastructure, or financial information. ERI may also require Personal Information from a third party at the direction of you as required to perform the Services.

Marketing Information	We may collect information to respond to inquiries regarding our products and/or services or to provide you with information, reports, or updates. We may also conduct occasional online surveys, which are entirely voluntary and you may decline to participate.
Social Media Features	Our website may contain interactive social media features, which may collect your IP address, track the pages you visited, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our Services. Your interactions with these features and widgets are governed by the Privacy Policy of the company providing them.
Conferences and Other Events	When you sign up for a video, telephonic conference, webinar, or other live or recorded event we may invite you to, or you may otherwise participate in, we may share any Personal Information you provide when signing up for any such event with other sponsors of the event.
Website Visitor Information	When you visit our website, we may collect information about your visit such as your IP address, the pages you visited, access or download and links clicked, and information about your device; and when you use our Services we may collect information on how you use those Services.
Geolocation Data	We may collect information about the type of device you are using, or the location of your device when you access or use our Services or otherwise consent to the collection of this information.
Information Collected by Cookies and Other Tracking Technologies	We and our service providers use various technologies, including cookies and web beacons, to collect information. Cookies are small data files stored on your device that help us to improve our Services and your experience, see which areas and features of our Services are popular, and count visits. Web beacons are electronic images that may be used in our Services or emails to help deliver cookies, count visits, and understand usage. For more information about cookies, and how to disable them, please see below “ <i>Cookies</i> ”.

This Personal Information is required to provide products and/or services to you. If you do not provide Personal Information we ask for, it may delay or prevent us from providing products and/or services to you.

2. How Your Personal Information is Collected. We collect most of this Personal Information directly from you—in person, by telephone, text or email and/or via our website, for example when you create an account; subscribe to our Services; participate in any interactive areas or features of the Services; subscribe to a newsletter or email list; access or download content through the Services; communicate with experts or other users through the Services; interact with us via third-party social media sites; register for an event organized by us; complete a survey; fill out a form; request customer support; or otherwise communicate with us regarding our Services, or for the purposes of project-related work or otherwise. However, we may also collect information:

- Directly from a third party (e.g., service providers like Google Analytics or HubSpot);
- From a third party with your consent (e.g., verification of your employer or your bank);
- From cookies or web beacons on our website; and
- Via our IT systems, which may include:
 - Door entry systems and reception logs; and
 - Automated monitoring of our websites and other technical systems, such as our computer networks and connections, access control systems, communications systems, email and instant messaging systems.

3. How and Why We Use Your Personal Information. Under data protection law, we can only use your Personal Information if we have a proper reason for doing so:

- To comply with our legal and regulatory obligations;
- To offer and administer our Services and products to you or other users;
- For our legitimate interests or those of a third party; or
- Where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests. **We will never sell your Personal Information to any third party.** The table below explains what we use (process) your Personal Information for and our reasons for doing so:

What we use your Personal Information for	Our reasons
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<p>To provide products and/or services to you</p> <p>Where permitted by applicable law, to advise you through email, phone call, or mail, in the ordinary course of business about other products or services similar to the products or services we have provided to you and that we think will be of interest to you.</p> <p>For hosting of events (including webinars). We may use your Personal Information to manage your registration to an ERI event, including sharing Personal Information with event co-hosts and tracking and facilitating event attendance.</p> <p>For improving our communications with you. Emails sent to you by us may include standard tracking, including open and click activities. We may collect information about your activity as you interact with our email messages and related content.</p>	<p>To offer and administer our Services and products to you or to take steps at your request before entering into a contract or as requested by you and individuals using our Services.</p> <p>For our legitimate interests or those of a third party, i.e. to conduct and manage our business.</p>
<p>For security purposes.</p>	<p>For our legitimate interests or those of a third party, i.e. to protect us and third parties against security breaches; to minimize fraud or criminal activity that could be damaging for us and for you; and to prevent unauthorized access and modifications to systems, or violation of our applicable agreements or business policies.</p> <p>To comply with our legal and regulatory obligations</p>
<p>Processing necessary to comply with professional, legal and regulatory obligations that may apply to our business or required by or relating to audits, enquiries or investigations by regulatory bodies, e.g. tax regulations, anti-money laundering regulations, or privacy or data collection regulations)</p>	<p>To comply with our legal and regulatory obligations.</p>
<p>Operational reasons, such as improving efficiency, training and quality control</p>	<p>For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price</p>
<p>Ensuring the confidentiality of commercially sensitive information</p>	<p>For our legitimate interests or those of a third party, i.e. to protect trade secrets and other commercially valuable information</p> <p>To comply with our legal and regulatory obligations</p>
<p>Statistical analysis to help us manage our business, e.g. in relation to our financial performance, customer base, product range or other efficiency measures</p>	<p>For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price</p>

<p>Updating and enhancing customer records</p>	<p>For the offer and administer our Services and products to you or to take steps at your request before entering into a contract</p> <p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with you about existing orders and new products</p>
<p>Ensuring safe working practices, staff administration and assessments</p>	<p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you</p>
<p>Marketing our services and those of selected third parties to:</p> <ul style="list-style-type: none"> — existing and former customers; — third parties who have previously expressed an interest in our Services; — third parties with whom we have had no previous dealings. 	<p>For our legitimate interests or those of a third party, i.e. to promote our business to existing and former customers</p> <p>With your consent.</p>
<p>We also process your data for other purposes if you have provided consent for such specified purposes, where such other purposes will be clearly provided at the time you provide consent.</p>	<p>With your consent.</p>

The above table does not apply to special category Personal Information, which we will only process with your explicit consent. Whenever we process your personal data for our legitimate interests, we make sure to consider and balance any potential impact on you and your rights under data protection laws.

4. Promotional Communications. We may use your Personal Information to send you updates (by email, text message, telephone or mail) about our products or services including exclusive offers, promotions or new products or services.

We have a legitimate interest in processing your Personal Information for promotional purposes (see above *“How and Why We Use Your Personal Information”*). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your Personal Information with the utmost respect and never sell OR share it with other organizations for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by:

- Contacting us at eriteam@emergentriskinternational.com;
- Using the “unsubscribe” link in emails or “STOP” number in texts; or

We may ask you to confirm or update your marketing preferences if you instruct us to provide further products or services in the future, or if there are changes in the law, regulation, or the structure of our business.

5. **Who We Share Your Personal Information With.** We will not share, sell or distribute any of the information you provide to us except as described in this policy. We may disclose aggregated information about you, and our users, and information that does not identify any individual, without restriction. We may share or disclose Personal Information that we collect, or you provide as described in this Privacy Policy with:
- Our affiliates and subsidiaries who act for ERI for the purposes set out in this policy;
 - External third-parties, such as vendors, consultants and other service providers we use to help deliver our products and/or services to you, such as payment service providers, cloud storage, and survey tools, including but not limited to Stripe, HubSpot and Mail Chimp;
 - Other third parties we use to help us run our business, such as marketing agencies or website hosts;
 - Third parties approved by you, including social media sites you choose to link your account to or third-party payment providers;
 - To fulfill the purpose for which you provide it;
 - For any other purpose disclosed by us when you provide the information; and
 - With your consent.

We only allow our service providers to handle your Personal Information if we are satisfied they take appropriate measures to protect your Personal Information. We also impose contractual obligations on service providers relating to ensure they can only use your Personal Information to provide services to us and to you.

We may also need to share some Personal Information with other parties, such as potential buyers of some or all of our business or during a re-structuring. We will typically anonymize information, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations; for billing and collection purposes; to protect and defend our rights or others; to prevent or investigate possible wrongdoing in connection with the Services; or to protect against legal liability.

6. **Cookies.** Depending on how you use our Services, we may store cookies on your computer in order to collect certain aggregate data about you and to customize certain aspects of your specific user experience. A cookie is a small data text file which is stored on your computer that uniquely identifies your browser. Cookies may also include more personalized information, such as your IP address, browser type, the server your computer is logged onto, the area code and zip code associated with your server, and your first name to welcome you back to our Services. We may use cookies to perform tasks such as: monitoring aggregate site usage metrics, storing and remembering your passwords (if you allow us to do so), storing account and promotional communications preferences that you have set, and personalizing the Services we make available to you. We may also use cookies to track your browsing behaviors to compile reports of our users' browsing patterns so that we can improve the Services. Most browsers are initially set up to accept cookies, but you can reset your browser to accept all cookies, refuse all cookies or to indicate when a cookie is being sent. However, some aspects of the Services may not function properly if you elect to disable cookies.

“Do Not Track” is a preference you can set in your web browser or on certain devices to inform Internet sites that you do not want to be tracked online. At this time, we do not support the Do Not Track signals set by your browser or device because there is not currently an industry or legal standard for Do Not Track signals.

7. **Third Party Analytics.** We may use automated devices and applications, or other analytic means, to monitor and evaluate usage of our website. This may include but not be limited to third party service providers such as

Google Analytics or Hubspot to collect, monitor and analyze access and usage of our Services. We use these tools to help us improve our Services, performance and user experiences. We may combine this information with other information we collect from your and/or our users.

- (a) *Google Analytics*: You can opt-out of having made your activity on the Services available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <http://www.google.com/intl/en/policies/privacy/>
- (b) *HubSpot*: For information on the privacy practices of HubSpot, please visit the HubSpot Privacy Policy web page: <https://legal.hubspot.com/privacy-policy>

8. Where Your Personal Information is Held. Information may be held at our offices and those of our third party agencies, service providers, representatives and agents as described above (see above: “*Who We Share Your Personal Information with*”). Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your Personal Information when this occurs, see below: “*Transferring Your Personal Information Out of the EEA*”.

9. How Long Your Personal Information Will Be Kept. We will keep your Personal Information while you have an account with us or while we are providing products and/or services to you. Thereafter, we will keep your Personal Information for as long as is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf;
- To show that we treated you fairly; or
- To keep records required by law.

We will not retain your Personal Information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of Personal Information. When it is no longer necessary to retain your Personal Information, we will delete or anonymize it.

10. Transferring Your Personal Information Out of the EEA. To deliver services to you, it is sometimes necessary for us to share your Personal Information outside the European Economic Area (EEA), e.g.:

- With our offices outside the EEA;
- With your and our service providers located outside the EEA;
- If you are based outside the EEA; or
- Where there is an international dimension to the services we are providing to you.

These transfers are subject to special rules under European and UK data protection law.

Non-EEA countries do not have the same data protection laws as the United Kingdom and EEA. We will, however, ensure the transfer complies with data protection law and all Personal Information will be secure. Our standard practice is to use standard data protection contract clauses that have been approved by the European Commission. Further information on these clauses may be found here: [European Commission SCCs June 2021](#)

If you would like further information, please contact us (see “*How To Contact Us*” below).

11. Your Rights Under the GDPR. The GDPR gives people under its protection certain rights with respect to their personal data collected by us. Accordingly, we recognize and will comply with GDPR and those rights, except as limited by applicable law. The rights under GDPR include:

- (a) *Right of Access.* This includes your right to access the Personal Information we gather about you, and your right to obtain information about the sharing, storage, security, and processing of that information.
- (b) *Right to Correction.* This is your right to request correction of your Personal Information.
- (c) *Right to Erasure.* This is your right to request, subject to certain limitations under applicable law, that your Personal Information be erased from our possession (also known as the “Right to be forgotten”). However, if applicable law requires us to comply with your request to delete your information, fulfillment of your request may prevent you from using the Service and may result in closing your account.
- (d) *Right to Complain.* You have the right to make a complaint regarding our handling of your Personal Information with the appropriate supervisory authority.
- (e) *Right to Restrict Processing.* This is your right to request restriction of how and why your Personal Information is used or processed.
- (f) *Right to Object.* This is your right, in certain situations, to object to how or why your Personal Information is processed.
- (g) *Right to Portability.* This is your right to receive the personal data we have about you and the right to transmit it to another party.
- (h) *Right to Not be Subject to Automated Decision-Making.* This is your right to object and prevent any decision that could have a legal, or similarly significant, effect on you from being made solely based on automated processes. This right is limited, however, if the decision is necessary for performance of any contract between you and us, is allowed by applicable law, or is based on your explicit consent.

For further information on each of those rights, including the circumstances in which they apply, see the guidance from the UK Information Commissioner's Office (ICO) on individual rights under the General Data Protection Regulation.

12. Your Rights in US States & Other Countries. If you live in one of the U.S. States or territories; or a foreign country that does not fall under the Non-EEA or GDPR provisions discussed above in this policy, you may have unique privacy or data rights. If you wish to contact us pursuant to another state, territory or foreign law, please contact us at eriteam@emergentriskinternational.com and be sure to provide a citation or link to any law you reference so we may better assist you.

13. Keeping Your Personal Information Secure. We have appropriate security measures in place to prevent Personal Information from being accidentally lost or used or accessed in an unauthorized way. We strive to use commercially acceptable means to protect your Personal Information, including, but not limited to, limiting access to your Personal Information to those who have a genuine business need to access it, not storing your emails, encrypting sensitive data, using industry standard server security, two factor authentication, end-to-end (SSL) encryption of protocols, encrypted security tokens, and complete removal of your information upon cancellation or termination of your account. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Unfortunately, no method of transmission over the Internet or any wireless network, or method of electronic storage, is 100% secure. By using our Services, you acknowledge that: (a) there are security and privacy limitations inherent to the Internet which are beyond our control; and (b) the security, integrity and privacy of any and all information and data exchanged between you and us through the Services cannot be guaranteed.

You should take steps to protect against unauthorized access to your password, phone, computer and devices by, among other things, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, backing up your emails, and keeping your log-in and password private. We are not responsible for any lost, stolen, or compromised emails, usernames, passwords or for any activity on your account or devices via unauthorized password activity.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

14. How to Exercise Your Rights. We aim to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Information. You may directly update your account settings at any time. If you have trouble doing so, or you would like to otherwise exercise any of your rights as described in this Privacy Policy, please contact eriteam@emergentriskinternational.com or you may write to us (see “*How to Contact Us*” below). Requests received via mail may be delayed due to limited office access during the Covid-19 pandemic. Please contact us by email to ensure your request is received in a timely manner.

If you choose to contact us directly in writing, whether by email or mail, you will need to provide us with:

- Enough information to identify you (e.g., your full name, address and customer or matter reference number);
- Proof of your identity and address (e.g., a copy of your driving license or passport and a recent utility or credit card bill); and
- A description of what right you want to exercise and the information to which your request relates.

We are not obligated to make a data access or data portability disclosure if we cannot verify that the person making the request is the person about whom we collected information or is someone authorized to act on such person’s behalf. Any Personal Information we collect from you to verify your identity in connection with your request will be used solely for the purposes of verification.

15. How to File a GDPR Complaint. We hope that we can resolve any query or concern you raise about our use of your information. The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in the European Union (or European Economic Area) state where you work, normally live, or where any alleged infringement of data protection laws occurred. Contact information for the supervisory authorities may be found here: [EU Data Protection Authorities](#)

16. Providing Information to ERI. If you choose not to provide certain Personal Information, it may be an impediment to the exchange of information necessary for the execution of the contract or provisions of Services, and we may not be able to provide you with some Services and you may not be able to participate in some of the activities on our website(s).

17. Third Party Websites or Other Services. We are not responsible for the privacy practices of any non-ERI operated websites, mobile apps or other digital services, including those that may be linked though ERI websites or Services, such as our affiliated or co-branded websites, and we encourage you to review the privacy policies or notices published thereon. ERI has no control over these websites and is not responsible or liable for the policies and practices followed by these other websites. The Personal Information you choose to provide to or that is collected by these other websites is not covered by this Privacy Policy.

18. Children’s Privacy. You must be at least 18 years old to have our permission to use our Services. Our policy is that we do not knowingly collect, use or disclose Personal Information about minor visitors. If you are the parent or guardian of a child under the age of eighteen and you believe we may have Personal Information regarding that child, please contact us at the address or phone number noted below so that we may delete that information from our systems.

19. Changes to This Privacy Notice. This privacy notice was published on August 1, 2021 and last updated on October 1, 2021.

We may change this privacy notice from time to time—when we do, we will inform by revising the “*Last Updated*” date at the top of this Privacy Policy and, in some cases, we may provide you with additional notice. We encourage you to review our Privacy Policy whenever you access the Services or otherwise interact with us to stay informed of our information practices and the ways you can help protect your privacy. We will not reduce your rights under this Privacy Policy without your explicit consent. We indicate the date the last changes were published at the top of this Privacy Policy.

20. How to Contact Us. Please contact us by mail or email if you have any questions about this Privacy Policy or the information we hold about you. Requests received via mail may be delayed due to limited office access during the Covid-19 pandemic. Please contact us by email to ensure your request is received in a timely manner.

Our contact details are as follows:

eriteam@emergentriskinternational.com

1910 Pacific Avenue, Ste. 8045

Dallas, Texas 75201

21. Do You Need Extra Help? If you would like this notice in another format (for example: audio, large print, braille) please contact us (see “*How to Contact Us*” above).