Privacy Policy

LAST UPDATED: January 31, 2025

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 means information that can be used to identify, locate or contact a natural person as well as any information about a natural person that can be connected with Personal Information. This Privacy Policy also explains your rights in relation to your Personal Information and how to contact us or supervisory or regulatory authorities in the event you have a complaint. This Privacy Policy applies when you access our website located at www.emergentriskinternational.com (the "Website") or its related or subsidiary websites, when you subscribe to our services or one of our products, including, but not limited to, Emergent RiskIQ™ (the "Platform") 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, the General Data Protection Regulation, which applies across the European Union, and the UK General Data Protection Regulation, which applies in the United Kingdom), and we are responsible as "controller" of that Personal Information for the purposes of those laws.

**Information We Collect About You.**

We may collect Non-Personal Information, which is information that does not identify you as a natural persona and is not identifiable to you as a natural person, including, without limitation, information that we anonymize or aggregate in such a way that no natural person can be identified.

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. |

| | |
|---|---|
| Conference 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 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. |
| 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 "Cookies". |

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.

Please note that as part of the Services available via the Platform, a condition of use and access to the Platform is that no user may submit or otherwise provide Personal Information to us.

**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.

**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 do not 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 |
|---|---|
| To provide products and/or Services to you<br><br>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.<br><br>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.<br><br>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. | 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. For our legitimate interests or those of a third party, *i.e*., to conduct and manage our business. |
| For security purposes. | 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. To comply with our legal and regulatory obligations |
| 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) | To comply with our legal and regulatory obligations. |
| Operational reasons, such as improving efficiency, training and quality control | 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 |
| Ensuring the confidentiality of commercially sensitive information | For our legitimate interests or those of a third party, *i.e.,* to protect trade secrets and other commercially valuable information To comply with our legal and regulatory obligations |
| Statistical analysis to help us manage our business, e.g. in relation to our financial performance, customer base, product range or other efficiency measures | 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 |

| | |
|---|---|
| Updating and enhancing customer records | For the offer and administer our Services and products to you or to take steps at your request before entering into a contract To comply with our legal and regulatory obligations 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 |
| Ensuring safe working practices, staff administration and assessments | To comply with our legal and regulatory obligations<br>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 |
| Marketing our services and those of selected third parties to:<br>• existing and former customers;<br>• third parties who have previously expressed an interest in our Services;<br>• third party with whom we have had no previous dealings. | For our legitimate interests or those of a third party, *i.e.*, to promote our business to existing and former customers<br>With your consent. |

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.

**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 legal@emergentriskinternational.com;
- Using the "unsubscribe" link in emails

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.

**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 Privacy 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.

**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**

"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.

**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

**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*".

**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 Privacy 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.

**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).

**Your Rights Under the GDPR.**

If you are a resident within the European Economic Area ("EEA"), you have rights under the General Data Protection Regulation and if you are a resident within the United Kingdom ("UK") you have rights under the United Kingdom General Data Protection Regulation. The laws are similar as they related to data subject rights, so will be referred to collectively as "GDPR" for convenience. 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 Acces*s. 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 GDPR.

***How to Exercise Your Rights under GDPR.***

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 legal@emergentriskinternational.com or you may write to us (see "*How to Contact Us*" below). 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 you request will be used solely for the purposes of verification.

***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

**Your California Privacy Rights – "CCPA Notice"**

California law grants additional privacy rights to California residents. In particular, the California Consumer Privacy Act of 2018, as amended by the California Privacy rights Act of 2020 (CCPA) requires businesses to disclose, for the past 12 months, (i) the categories of personal information collected, (ii) the sources of the collected personal information, (iii) the purposes for which the collected personal information is used, (iv) the categories of personal information disclosed for a business purpose, and (v) the categories of any personal information sold or shared. We provide these disclosures in the following table.

When we use the term "personal information" in this CCPA Notice, we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

(Note that ERI does not sell or share any personal information under the CCPA's definitions of a "sale and "share")

| Category | Sources of Collection | Purposes of Collection | Disclosures for a Business Purpose |
|---|---|---|---|
| Identifiers | Website visits, creation of accounts and registration for our products and Services, importation or upload by users of the Services, when you sign up for a video, telephone conference, webinar or other live or recorded event | For user registration, to enable us to provide our products and Services and to allow us to communicate with you | To Third Party Service Providers to assist in providing our products and Services, for processing associated payments, and other functions, such as cloud storage, survey tools, marketing, and social media sites you choose to link your account |

| | | | |
|---|---|---|---|
| Customer records information | Subscription to the Services or renewal of your subscription | To process payment for the products and Services purchased, and to provide our products and Services and to allow us to communicate with you | To Third Party Service Providers to assist in providing our products and Services, for processing associated payments, and other functions, such as cloud storage, survey tools, marketing, and social media sites you choose to link your account |
| Commercial information | When you register for our products and Services, importation or upload by users of the Services, when you respond to inquiries regarding our products and Services, and in response to surveys | To provide our products and services to users and maintain purchase history | To Third Party Service Providers to assist in providing our products and Services, for processing associated payments, and other functions, such as cloud storage, survey tools, marketing, and social media sites you choose to link your account |
| Internet or other electronic network activity | Your browsing and search history on our Website and Services and other interactions with our Website or Services, when you sign up for a video, telephone conference, webinar or other live or recorded event | To improve the user experience on the Website, diagnose server problems and administer the Website, to improve the Services functionality, and for security purposes | To Third Party Service Providers for the purpose of enhancing the Website |
| Professional or employment-related information | When you register for our products and Services, importation or upload by users of the Services, when you respond to inquiries regarding our products and Services | To enable us to provide our products and Services, and to improve the user experience on the Website | |
| Geolocation data | When you access or use our Services, which is collected by cookies | To enable us to provide our products and Services, and to improve the user experience on the Website | To Third Party Providers for the purpose of enhancing the Website and for marketing purposes |
| Inferences drawn from other personal information | Your browsing and search history on our Website and other interactions with our Website and Services | To improve the visitor experience on our Website | To Third Party Providers for the purpose of enhancing our Website and for marketing purposes |

California residents may exercise the following rights in relation to the personal information we collect about you, subject to certain limitation as allowed by law:

(a) *Right to Know* what personal information we have collected about you and how we use and share it.

(b) *Right to Limit* the use and disclosure of sensitive personal information we collect about you.

(c) *Right to Opt Out* of the sale of your personal information, and the right to opt-out of the sharing of your personal information for cross-context behavioral advertising.

(d) *Right to Correct/Rectify* inaccurate personal information that we have about you.

(e) *Right to Equal Treatment*. We will not discriminate against you for exercising your CCPA rights.

(f) *Right to Delete* personal information we have collected from you, and require that our service providers do the same (subject to some exceptions).

***The Right to Limit Use of Your Sensitive Personal Information***

You can direct us to only use your sensitive personal information (for example, your financial account information, or your precise geolocation data) for limited purposes, such as providing you with the services you requested.

***The Right to Know***

You have the right to request any or all of the following information relating to the personal information we have collected about you or disclosed in the last 12 months, upon verification of your identity:

- The specific pieces of personal information we have collected about you;
- The categories of personal information we have collected about you;
- The categories of sources of the personal information we have collected about you;
- The categories of personal information that we have disclosed about you to third parties for a business purpose, and the categories of recipients to whom this information was disclosed;
- The categories of personal information we have sold about you, and the categories of third parties to whom this information was sold; and
- The business or commercial purposes for collecting or selling personal information about you.

You can make a request to know up to twice a year, free of charge.

***The Right to Request Deletion***

You have the right to request the deletion of personal information that we have collected from you, and to require that the third parties we have shared it with also delete it, subject to certain exceptions in which we are required to retain such information, including compliance with other laws and court orders. We may maintain a confidential record of deletion requests solely for the purpose of preventing the personal information of a consumer who has submitted a deletion request from being sold, for compliance with laws or for other lawful purposes.

***The Right to Correct Inaccurate Personal Information***

You have the right to request that we correct inaccurate personal information we maintain about you. Once we receive a verified request to correct your inaccurate personal information, we will use commercially reasonable efforts to correct it.

***The Right to Opt-Out of Personal Information Sales and Sharing***

You as a resident of California or Nevada have the right to direct us not to sell or share personal information we have collected about you to third parties now or in the future.

***The Right to Non- Discrimination***

You have the right not to receive discriminatory treatment for exercising any of the rights described above. However, please note that if the exercise of the rights described above limits our ability to process personal information (such as in the case of a deletion request), we may no longer be able to provide you our products or services or engage with you in the same manner.

***"Shine the Light"***

We may sell or share information you provide to us to third parties. However, Residents of the State of California may ask us to provide them with a list of the types of personal information that we have disclosed during the preceding year to third parties for their direct marketing purposes, and the identity of those third parties.

***How to Exercise Your California Privacy Rights***

You may contact us to exercise these rights at legal@emergentriskinternational.com or by calling us at **+1 (888) 596-9421.**

We will need to verify your identity before processing your request. In order to verify your identity, we may require matching identifying information you provide us to the information we maintain about you in our systems or a successful login to your account (as applicable).

We use good faith efforts to respond to a verifiable consumer request to know or to delete within forty-five (45) days after its receipt. If we need more time (up to 90 days), we will inform you of the reason and the needed extension period in writing.

You do not need to create an account with us to exercise your privacy rights. However, we may ask you to provide additional personal information so that we can properly identify you in our dataset and to track compliance with your opt-out request. We will only use personal information provided in an opt-out request to review and comply with the request. If you choose not to provide this information, we may only be able to process your request to the extent we are able to identify you in our data systems and authenticate you as authorized to receive the information.

Once you make an opt-out request, you may change your mind and opt back in to personal information sales at any time by contacting us at legal@emergentriskinternational.com.

***Authorized Agent***

California residents may use an authorized agent to make a CCPA privacy request on the resident's behalf. To make a request on behalf of a California consumer, the authorized agent must provide a copy of either (a) a letter signed by the consumer authorizing the agent to submit a CCPA request on the consumer's behalf, or (b) a power of attorney, duly authorized and issued pursuant to California Probate law. The authorized agent must email one or both documents to legal@emergentriskinternational.com and include a phone number where the agent may be reached during regular business hours.

***Household Requests***

Under the CCPA, members of a California household can jointly request access to personal informat0ion for the household or the deletion of all household personal information. To make a household request, each member must first submit an Access or Deletion request on an individual basis. After submitting the individual requests, each member must submit an email to legal@emergentriskinternational.com and request that their Access or Deletion requests be combined with the other members of their household.

***Financial Incentives***

We do not currently offer incentives in exchange for the retention, sale, or sharing of personal information.

***Compliance Information***

The number of requests to know we have received, complied with in whole or in part, or denied; 0

The number of requests to delete we have received, complied with in whole or in part, or denied; 0

The number of requests to opt-out we have received, complied with in whole or in part, or denied; 0

The median or mean number of days within which the business substantively responded to requests to know, requests to delete, and requests to opt-out; 0

If you have any questions, or concerns regarding our Privacy Policy and privacy practices, please contact us via email at legal@emergentriskinternational.com; via telephone at [insert]; or by writing us at the address provided in the "*How to Contact Us*" section below

**Your Colorado Privacy Rights**

If you are a Colorado resident, you have the following rights under the Colorado Privacy Act (CPA) in relation to your personal information, subject to certain exceptions:

(a) *Right of Access*. You have the right to confirm whether we collect personal information about you and, if so, what personal information we collect, use, disclose, and/or sell, as applicable.

(b) *Right to Delete*. You have the right to request the deletion of your personal information that is collected by us.

(c) *Right to Correct*. You have the right to request that we correct inaccuracies in the personal information that we collect about you.

(d) *Right to Opt-Out of Sale*. You have the right to opt-out of the sale of your personal information to third parties for the purpose of targeted advertising, profiling in furtherance of decisions that produce legal or similarly significant effects concerning a consumer or for monetary return. You may authorize another person acting on your behalf to opt out of the processing of your personal information for any of the reasons set forth above. However, as noted above, we do not currently sell any personal information.

(e) *Right to Data Portability*. No more than two times per calendar year, you have the right to request a copy of your personal information we have collected and maintained about you that allows you to transfer the data to another entity.

If you wish to determine if you are eligible to exercise any of the rights and, if so, exercise any of the rights set out above, please legal@emergentriskinternational.com and, in your subject line indicate that your contact is "Data Subject Request" and provide us information about what data subject right(s) you would like to access so we can begin the data subject response process.

Any request you submit to us to know, to delete or to correct is subject to an identification and residency verification process as permitted by Colorado law. We will not fulfill your request unless you have provided sufficient information that enables us to reasonably verify that you are the consumer about whom we collected the personal information.

This section describes your Colorado data subject rights and explains how to exercise those rights and also describes various exclusions and exceptions under Colorado law.

We will respond to your request within 45 days after receipt of a Verifiable Consumer Request for a period covering 12 months and for no more than twice in a twelve-month period. We reserve the right to extend the response time by an additional 45 days when reasonably necessary and provided consumer notification of the extension is made within the first 45 days. We will deliver our written response electronically.

Any disclosures we provide will only cover the 12-month period preceding our receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily usable and should allow you to transmit the information from one entity to another entity without hindrance.

You may submit data subjects requests to know two times within any 12-month period. We can deny more frequent requests. There are no limits on the number of deletion or correction requests you can make. However, we may deny or charge a fee for manifestly unfounded or excessive deletion requests in line with our administrative costs for the deletion requests.

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.

Within 45 days of a valid and verifiable data subject request, if we do not take any action on the request, we will let you know why, which is usually because we cannot verify your identity or we have verified your identity but identified that you are not and have not been a Colorado consumer in the relevant time period and not able to exercise rights under the CPA. We will provide information about how you may appeal this decision / non-action in that communication.

You may contact the Colorado Attorney General if you have concerns about the result of your appeal.

We will not process personal information in violation of state or federal laws that prohibit unlawful discrimination against consumers.

We will not discriminate against you for exercising any of your CPA rights. Unless permitted by the CPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

**Other State Consumer Privacy Disclosures**

The disclosures in this section supplement our general provisions of this Privacy Policy and are made pursuant to the following state consumer privacy laws:

Connecticut Data Privacy Act
Utah Consumer Privacy Act

Virginia Consumer Data Protection Act

For the purposes of this section, these laws will be referred to collectively as State Consumer Privacy Laws. References to "personal information" in our general Privacy Policy describe our practices with respect to "personal data," as defined under these State Consumer Privacy Laws.

***Categories of Personal information and Purposes of Processing***

You can learn more about the categories of personal information and sensitive data that we collect about consumers and the purpose for processing as set forth above.

***Your Rights Under State Consumer Privacy Laws***

If you are a resident of a state that has enacted a State Consumer Privacy Law, then, subject to certain conditions and exclusions, you have the following rights with regard to your personal data:

- *Right to access*. You have the right to request access to and obtain a copy of any personal information that we may hold about you.
- *Right to correct*. You have the right to request that we correct inaccuracies in your personal data. Although Utah law does not grant its residents this right, we grant Utah residents the right to request correction of their data.
- *Right to delete*. You have the right to request that we delete personal information that we have collected from or obtained about you.
- *Right to opt out of the sale of personal information.* You may request that we stop disclosing or making available your data in a way that is considered a "sale".
- *Right to opt out of targeted advertising*. You may request that we stop disclosures of your personal information for targeted advertising.
- *Right to withdraw consent*. If you have previously granted us consent to process your sensitive data, you have the right to withdraw consent.
- *Right to opt out of profiling*. You have the right to opt out of profiling in furtherance of decisions that produce legal or similarly significant effects. We do not profile in a manner that would result in legal or similarly significant effects and as such do not offer this right.
- *Right to appeal*. If you live in Connecticut, or Virginia and are unsatisfied with our decision not to take action on your request to exercise one of your privacy rights, you may appeal our decision. Although Utah law does not grant its residents this right, we accept appeals from Utah residents using the same process.
- *Right to non-discrimination*. If you choose to exercise any of the privacy rights described above, we will not deny our products or services to you, charge you different prices or provide a different level or quality of products or services to you unless those differences are related to the value of your personal data.

***How to Exercise Your Rights Under State Consumer Privacy Laws***

- Email Us: legal@emergentriskinternational.com
- Calling us at **+1 (888) 596-9421.**

We will only use personal information that you provide in a request to authenticate the request. We will not further disclose the personal information and will retain it only as necessary for the purpose of authentication and to meet our legal obligations. We cannot fulfill your request if we cannot authenticate it and confirm the personal information that is subject of the request relates to you.

***Authorized Agents***

If you are a Connecticut resident, you may use an authorized agent (a person or entity acting on your behalf) to submit a request to opt-out out of our processing of personal information for the purposes of targeted advertising or sales. If you use an authorized agent to submit a request, we will not act on that request unless we are able to authenticate, with commercially reasonable effort, both your identity and the authorized agent's authority to act on your behalf.

**Nevada and Utah Resident Privacy Rights**

We do not disclose a user's personal information to any third party for such third-party's direct marketing purposes. Nevada S.B. 220 allows Nevada residents to opt-out of the sale of their personal information now in the event we change our Privacy Policy in the future. If you are a Nevada resident we want you to know that, in the event we sell your personal information, you will have choices and can opt out and can affect them by contacting us by email at Emergent Risk International, 1910 Pacific Avenue, Ste. 8045 Dallas, Texas 75201 or legal@emergentriskinternational.com. This may prevent or restrict your use of the Site and/or Service in the future.

**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).

**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.

**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.

**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.

**Consent to Receive Electronic Notifications**

Electronic communication is the most effective and timely way to provide the users of the Website and Services with any optional or required notifications and disclosures. In some circumstances, however, applicable laws may require us to send you disclosures or communications in paper format unless you have affirmatively consented to receiving electronic notifications only in advance of the notification. Through this Privacy Policy, pursuant to 15 U.S.C. § 7001, you hereby affirmatively consent to receive electronic notifications and disclosures from us only (without requiring a paper copy) and you represent that, to date, you have not withdrawn such consent. You have the right to change your mind and withdraw your consent at any time. If you would like to withdraw your consent to receive electronic notifications and/or would like to request paper copies of any required notifications you receive electronically, you may contact us. To receive electronic records, you will need access to a smartphone, tablet, laptop or computer with internet access and an email account.

**Changes to This Privacy Policy.**

We may change this Privacy Policy 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.

**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. Our contact details are as follows:

legal@emergentriskinternational.com
11F Bowler Lane
Newport, RI 02840
**+1 (888) 596-9421.**

**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).