

Privacy and Data Usage Policy

Effective Date: February 1, 2019

Last modified: March 18, 2019

Introduction

AIIR Consulting, LLC (“**Company**” “**we**” “**our**” or “**us**”) respects your privacy and is committed to protecting it through our compliance with this policy. This policy describes the types of information we may collect from you or that you may provide when you visit the website <https://www.aiirconsulting.com> and our associated user platform available at www.aiirconsulting.com/privacy-policy or any other associated software applications (collectively, the “**AIIR Sites**”) and our practices for collecting, using, maintaining, protecting, and disclosing that information. Company is the controller and responsible for your personal data collected via the AIIR Sites.

This policy applies to information we collect: (i) on the AIIR Sites; (ii) in email, text, and other electronic messages that you initiate via the AIIR Sites; (iii) our marketing contacts with you as permitted hereunder. This policy does not apply to information: (a) collected by Us offline or through any other means, including on any other AIIR Sites operated by the Company or any third party (including our affiliates and subsidiaries); or (b) to other sites to which we may link. We may post links on the AIIR Sites as a way of helping you locate related information and products, however, when linking to another AIIR Sites, you must review that website’s privacy policy because other w may not protect or process your information in the same manner as the Company.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, do not use the AIIR Sites or provide the Company with any of your personal information. By accessing or using the AIIR Sites and/or by contacting the Company and providing any personal information, you consent to the collection and use of information by the Company in accordance with this privacy policy.

It is our policy to post any changes we make to our privacy policy on this page which we may do from time to time without prior notice, except that if we make material changes to how we treat our users’ personal information, we will notify you by email to the email address you have provided us and through a notice on the AIIR Sites. The date the privacy policy was last revised is identified at the top of the page. Please ensure that we have an up-to-date email address for you, and for periodically visiting our AIIR Sites and this privacy policy to check for any changes.

Children Under the Age of 13

Our AIIR Sites are not intended for children under 13 years of age. No one under age 13 may provide any information to or on the AIIR Sites. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on the AIIR Sites or on or through any of its features/register on the AIIR Sites, make any purchases through the AIIR Sites, use any of the interactive or public comment features of the AIIR Sites or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. 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 info@aiirconsulting.com.

Information We Collect About You

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes name, title, date of birth and gender.
- **Contact Data** includes mailing/billing address, email address and telephone numbers.
- **Financial Data** includes [bank account and payment card details].
- **Transaction Data** includes details about payments to and from you and other details of products and services you have used or purchased from us.

- **Technical Data** includes internet protocol (IP) address, your login data, 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 this website.
- **Profile Data** includes your username and password, purchases or orders made by you (or by your employer on your behalf), your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our AIIR Sites, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

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 offences.

How we collect this information

We use different methods to collect data from and about you including: (i) directly from you when you provide it to us; (ii) automatically as you navigate through the site; and (iii) from third parties, for example our business partners; each as described in greater detail below. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.

Information You Provide to Us

The information we collect on or through our AIIR Sites may include:

- Information that you provide by filling in forms on our AIIR Sites. This includes information provided at the time of registering to use our AIIR Sites, subscribing to our service, posting material, or requesting further services. We may also ask you for information when you report a problem with our AIIR Sites.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to surveys, assessments and other services that you participate in via the AIIR Sites.
- Details of transactions you or your employers carry out through our AIIR Sites and of the fulfillment of your orders. You may be required to provide financial information before placing an order through our AIIR Sites.
- Your search queries on the AIIR Sites.
- Forms

You also may provide information to be published or displayed (hereinafter, “**posted**”) on public areas of the AIIR Sites, or transmitted to other users of the AIIR Sites or third parties (collectively, “**User Contributions**”). Your User Contributions are posted on and transmitted to others at your own risk. Please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the AIIR Sites with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our AIIR Sites, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including: (i) details of your visits to our AIIR Sites, including traffic data, location data, logs, and other communication data and the resources that you access and use on the AIIR Sites; and (ii) information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically may include personal information or we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our AIIR Sites and to deliver a better and more personalized service, including by enabling us to: (i) estimate our audience size and usage patterns; (ii) store information about your preferences, allowing us to customize our AIIR Sites according to your individual interests; (iii) speed up your searches; and (iv) recognize you when you return to our AIIR Sites.

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. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our AIIR Sites. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our AIIR Sites.
- **Flash Cookies.** Certain features of our AIIR Sites may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our AIIR Sites. Flash cookies are not managed by the same browser settings as are used for browser cookies.
- **Web Beacons.** Pages of our the AIIR Sites and our info@aiirconsulting.com email may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an info@aiirconsulting.com email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. Disabling cookies may impact how you view and interact with the Sites, including rendering some features unusable. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's Sites. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.

Information About You We May Receive from Third Parties

We may receive personal data about you from various third parties and public sources including:

- your employer to the extent your employer has signed you up to receive services via the AIIR Sites
- analytics providers [such as Google];
- advertising networks [such as Social Media Pixels and Mail Chimp; and
- Identity and contact data from publicly available sources.

How We Use Your Information

We, and our authorized third party service providers, may use information that we collect about you or that you provide to us, including any personal information:

- To present our AIIR Sites and its contents to you.
- To provide you with information, products, or services that you request from us.
- To notify you about changes to our AIIR Sites or any products or services we offer or provide though it or other products or services which may be of interest to you
- To analyze trends and conduct research about improving our products, services and AIIR Sites.
- To correlate information with other commercially available information to identify demographics and preferences to assist us in marketing efforts.
- To contact users for research, informational or marketing purposes.
- To learn about our users' needs.

- To address information security and/or privacy practices control, network functioning, engineering, and troubleshooting issues.
- To investigate claims and/or legal actions, violations of law or agreements, and compliance with relevant applicable laws and legal process.
- To comply with law, or based on our good-faith belief that it is necessary to conform or comply with the law, or otherwise to disclose information to prevent fraud and reduce credit risks, to cooperate with police and other governmental authorities, or to protect the rights, property or safety of visitors to the AIIR Sites or the public.
- To process or engage in a sale of all or part of our business, or if we go through a reorganization or merger.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your account/subscription, including expiration and renewal notices.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you or your employer and us, including for processing credit cards, billing and collection.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may also use your information to contact you about our own goods and services that may be of interest to you and to display advertisements to you when you visit other websites via our third party ad placement vendors. We will get your consent before sending direct marketing communications to you via email or text message. If you do not want us to use your information in this way, you can opt out by notifying us of your intent to unsubscribe from such communications either by clicking the “unsubscribe” link contained therein or contacting us at: info@aiirconsulting.com.

Lawful Basis of Processing

We collect and process your personal information under the following lawful bases:

- (i) With your consent as provided hereunder;
- (ii) Performance of a contract with you;
- (iii) As necessary to comply with a legal obligation; and
- (iv) To fulfill our legitimate interest in conducting our business, where your interests and fundamental rights do not override those interests including, but not limited to:
 - a. providing the services for which you have enrolled;
 - b. to keep our records updated;
 - c. to study how customers use our products/services, to develop them and grow our business and inform our marketing strategy;
 - d. for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercises;
 - e. contacting you about our products, or responding to your requests.

Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To our 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 a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Company about our AIIR Sites users is among the assets transferred.
- To fulfill the purpose for which you provide it. (e.g. payment processing)
- For any other purpose disclosed by us when you provide the information.
- With your consent.
- To comply with any court order, law, or legal process
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers, or others
- To enforce or apply our terms of use available at www.aiirconsulting.com/privacy-policy.

PLEASE NOTE TO THE EXTENT YOU ARE UTILIZING THE AIIR SITES AS A RESULT OF BEING ENROLLED BY YOUR EMPLOYER WE MAY DISCLOSE CERTAIN INFORMATION ABOUT YOUR PARTICIPATION AND ASSESSMENTS TO YOUR EMPLOYER, INCLUDING INFORMATION ABOUT PARTICIPATION/UTILIZATION RATES AND SCHEDULING.

TO THE EXTENT YOU COMPLETE A SURVEY ABOUT YOUR EXPERIENCE USING THE AIIR SITES AND RELATED SERVICES THIS INFORMATION MAY ALSO BE DISCLOSED TO YOUR EMPLOYER.

Opting Out

You can ask us or third parties to stop sending you marketing messages at any time by (i) logging into the Sites and checking or unchecking relevant boxes to adjust your marketing preferences; (ii) by following the opt-out links on any marketing message sent to you; or (iii) by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service experience or other transactions.

Data Retention

We will only retain your personal data for as long as reasonably necessary to fulfil 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 data, 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.

Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data, which may include rights to the following:

- Request access to your personal data.
- Request correction of your personal data.

- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Withdraw consent.

If you wish to exercise any of the rights set out above, please contact us at info@aiirconsulting.com.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

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 AIIR Sites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the AIIR Sites like message boards. The information you share in public areas may be viewed by any user of the AIIR Sites.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we can neither guarantee the security of your personal information transmitted to our AIIR Sites nor can we guarantee that such information will not become publicly available. 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 AIIR Sites. You can reduce these risks by using common-sense security practices such as choosing a strong password, using different passwords for different services, and using up-to-date antivirus software on your electronic devices.

Users Outside of the United States

If you are visiting the AIIR Sites from a location outside of the United States, your connection will be through and to servers located in the United States. All information you receive from the AIIR Sites may be created on servers located in the United States, and all information you provide may be maintained on web servers and systems located within the United States. The data protection laws in the United States and other countries might not be the same as those in your country. By using the AIIR Sites or submitting information to us, you specifically consent to the transfer of your information to the United States and to the facilities and servers we use, and to those with whom we may share your information.

Your California Privacy Rights

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights, visit www.aiirconsulting.com/privacy-notice-for-california-residents.

California Civil Code Section § 1798.83 permits users of our AIIR Sites 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 info@aiirconsulting.com or write us at the address listed below.

Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

AIIR Consulting, LLC

50 Monument Rd #205, Bala Cynwyd, PA 19004

info@aiirconsulting.com

Tel: (215) 353-5012

Depending on where you reside you may have the right to make a complaint to your local supervisory authority for data protection issues. We would, however, appreciate the chance to deal with your concerns first so please contact us.