

## Privacy Policy

Last Modification Date: February 2, 2023

**At Quaternary Healthcare Consultancy, LLC**, we take your privacy seriously. We want to provide a safe and enjoyable online experience for all of our website visitors at <https://www.quaternaryconsultant.com> (the “Website”). We understand that you are concerned about the use and sharing of your personal information. To help you stay informed about the collection, use, and disclosure of the Information we receive from both you and other users of this website, we have prepared this comprehensive Privacy Policy.

This Website is owned and operated by Quaternary Healthcare Consultancy, LLC (the “Company”).

By continuing to use this Website, or otherwise accepting the Terms of Service (via checkbox, opt-in, pop-up or clicking an email link) you understand and agree to be bound by both this Privacy Policy, as well as the Terms of Service of this Website.

### **Information We May Collect on the Website**

In today’s technology age, it is inevitable that the websites you visit will learn certain information about you, and our Website is no different. On our Website, we will from time to time request certain information about you, and we may also collect other information automatically with no action on your part. It is important that you understand that we will only collect and process your personal data and information when we have a lawful bases for doing so. We will have a lawful bases to collect and process your data if you provide us with consent, if we enter into a contractual relationship that allows us to collect and/or process your data, or if we otherwise have a legitimate interest in processing your personal data.

#### a) **Information you May Provide Voluntarily**

**Personal Information.** We may ask you for your name, address, email address and/or phone number when you request information from our Website, sign up for a newsletter or email list, respond to a survey, register for a webinar or masterclass, purchase a product or service, or sign up for a subscription. We will only ask you for the personal information that we deem necessary in order to provide you with the requested information or fulfill our legal obligations to you. In other words, if you try to purchase a legal template, we won’t ask for your date of birth or social security number if it is not required in order to fulfill your order.

**Billing Information.** If you decide to order a product or service through our Website, we will maintain certain information about the products or services you

purchase. In addition, you will be asked to provide the information necessary to process your payment when you checkout. In general, you will be asked to provide a debit or credit card, or possibly an e-check. Along with this information, you will need to provide the account number of the card or checking account, a routing number (for an e-check), expiration dates, a security code for the card, your billing address, the name on the card, and other such information.

In almost all situations, this information will be processed and captured by various third-party vendors, including but not limited to certain payment processors and merchant account providers. None of this information will ever be captured or retained by the Company. Any third-party vendors that we use as part of our business practices will be doing so in compliance with their own business terms and conditions, including their own privacy policies.

- b) Information We May Collect Automatically. We may collect additional information from you in addition to the voluntarily provided information described above.

**Activity Regarding Your Use of Our Website.** The following information regarding your computer hardware and software may be collected based on how, when and where you access our Website: Internet Protocol (“IP”) addresses, your operating system, the browser you are using, the device you may be using, whether your device is a laptop, tablet or smartphone, URL’s you visit, dates and times you have accesses the Website, information about the sites that referred you, universally unique identifiers (“UUID”), advertising identifier (“IDFA”), internet carrier and country location, hardware and processor information, the type of network you used and other related data.

**Cookies.** These are not the cookies you eat. In order to deliver a better web experience for you, we may use cookies. Although they sound delicious, these are electronic files that contain small amounts of data about your visit to our Website. They are stored on the hard drive of your computer or mobile device and will remember your web-browsing preferences for when you return to a certain website, including ours. Some of the core functions that Cookies perform include remembering your log-in names and passwords, saving the contents of your online shopping carts, and storing images on the websites you visit to decrease load times. We may make use of both persistent cookies (which stay on your computer or mobile device until they are deleted) and session cookies (that terminate or expire after you close your web browser). The purpose of these cookies is to improve your overall experience with our Website. Many web browsers, including Chrome, Safari and Firefox, will allow you delete the existing cookies on your Computer and/or set your preferences such that your computer or mobile device will not accept incoming cookies. However, turning on this function may interfere with your ability to use the Website as it was optimally intended.

**Third-Party Analytics.** In order to evaluate, track, and aggregate visitor data, we may use various third-party analytics services (including Google Analytics, or other such services). These services are invaluable in allowing us to evaluate how you and other visitors use our Website. Some of the information these services can provide include data regarding how much time you spend on certain pages, what pages on our Website receive the most traffic, how visitors click through our Website, as well as general geographic data about our Visitors, the source of referred traffic, popular keyword searches, and other related information. In order to help analyze and collect this data, these services will use cookies, pixels, and other related technologies.

By consenting to this *Privacy Policy*, you consent to allowing the collection and review of this data as it relates to your activities by the analytics providers we contract with, provided this information is used in the lawful manner and for the legal purposes we have described herein.

For more information on Google Analytics, as well as for information on how to opt out from certain data collection practices, visit:

<https://policies.google.com/technologies/cookies>

<https://www.wix.com/manage/analytics>

### **Retargeting Ads / Pixels**

Have you ever been to a website to look for a certain product, and then everywhere you go on the web you see images and ads related to that product? Those are called “retargeting ads”. When you visited the original website containing the product or service you were interested in, that website has what is called a retargeting pixel on it that is activated when you visited that site. In the same way we may, from time to time, collect information about your visits to our website in order to share relevant and timely advertising content to you in the future. Typically, these ads will be run through certain third-party marketing platforms operated by websites such as Google, Facebook, Instagram, YouTube, or Pinterest, among others. You may notice advertisements from our Company on these third-party sites based on the data we collect from you during your visit to our Website.

Here is more information about each of these website ad platforms, with relevant links showing how you may opt-out of seeing personal ads on these sites.

**Google Analytics:** As stated previously, we use Google Analytics on our Website. Analytics Advertising Features is a collection of features that takes advantage of the Google advertising cookies, which allows us to:

- Create Remarketing Audiences based on specific behavior, demographic, and interest data, and share those lists with Google Ads
- Use demographic and interest data in our Analytics reports
- Create Segments based on demographic and interest data

If you wish to opt-out of seeing personalized advertisements on the Google platform, please visit: <https://support.google.com/accounts/answer/2662922?hl=en>

If you are interested in learning more about how Google uses cookies in its advertising platforms and how you can control or block your information, visit: <https://policies.google.com/technologies/ads>

You may also personalize the ads you see on the Google platform: <https://support.google.com/ads/answer/2662856>

There is a wealth of information online that is constantly being updated with regards to how Google uses and shares your information. We encourage you to read Google's [Privacy Policy](#) in full and learn as much as you can about how to protect your private information.

**Other Advertising Services.** The list of services above may not be all inclusive of the programs we participate in to create personalized and custom advertising services. As we join other programs, we will update this privacy policy accordingly.

### **Accessing Your Personal Information.**

Depending on what information you provided, and how you provided it, you may be able to access, review and change this information directly on the Website, or by emailing us directly at [qhc@quaternaryconsultant.com](mailto:qhc@quaternaryconsultant.com). You may opt-out of any marketing emails at any time by clicking the “unsubscribe” link located on the bottom of any marketing-related email you receive from the Company. If you purchase products or services via our Website or on the Phone, you will receive an email from us automatically that confirms the purchase and you are unable to opt-out of these emails. If you send a request to delete or remove your personal information from our database, we will make our best efforts to accommodate those requests in a timely fashion. However, there may be occasions where we may not be able to modify or completely remove your information and in those situations, we will advise you accordingly.

### **How We Use and Share Your Information**

As mentioned above, we have a lawful purpose for all of the information we collect and process. Here is a list of some of the various ways we will use your information:

- Email you relevant and timely offers for our products and services;
- Improve the quality and content of information in our Website, including our services and/or product offerings;
- Process and deliver your electronic order, administer our online courses and other programs, and otherwise provide a high level of service and customer support to you and other customers;
- Provide timely replies and responses to your email and other requests, including providing ongoing customer service in response to any issues or concerns you may have about our Website or our products, services and/or features;
- Keep you informed of not only our own products and services, but also those of certain third parties that we determine would be of interest or valuable to you;
- Solicit and request your feedback through email surveys and telephonic calls; and,
- Fulfill our legal and/or contractual obligations to you.

You should also be aware that your credit card company or banking provider may also collect and retain certain information about you and the purchases you make when you transact on our Website. Unless we have your explicit permission, we will not otherwise provide any additional personal information to your credit card company except as outlined elsewhere in the Privacy Policy.

From time to time, the information you provide to us may be shared with certain affiliates, agents, joint venture partners, other businesses which we have common control over, current or potential business partners, third-party businesses or vendors who assist in administering our services or programs, or to other businesses or vendors who assist us in providing core business functions such as customer service, technical support or to administer our marketing efforts. We will limit the information provided to these businesses to only what is required for them to perform their core functions or as otherwise permitted by law.

We may share your data with potential buyers of our business or other potential transferees as may result from a bankruptcy or other liquidation of our business.

If you are delinquent in your legal and contractual obligations to the Company, we may share your information with our attorneys or a court of law in order to collect on a debt you owe us and otherwise enforce our legal rights.

Although it is unlikely, there may come a time when we are obligated or compelled to disclose your information as a result of a legal process, investigation, court order,

or subpoena, or we may be otherwise required to disclose personal data in order to reasonably protect the interests of the Company, its property, the Website, or the overall safety of visitors, others, or the public at large.

### **Managing Your Cookies on a Web Browser and/or Mobile Device.**

Each web browser or mobile device is slightly different, but all will provide a mechanism for you to manage and control the cookies that are stored on your machine. Please visit the help section of your browser or do a quick web search for “how to manage cookies on [insert name of your web browser or mobile device]” for up to date and step by step instructions to clear out your cookies.

### **Sharing Your Information Online**

When you enroll in online courses, webinars, conference calls, etc., or otherwise participate in online forums, chat rooms, or even submit comments on a blog or social media post, you are voluntarily making your Personal Information available to third parties in an online environment. It is important that you understand that when you engage in these types of online activities, your information can be saved, viewed, copied, used, collected and/or saved by individuals other than employees or agents of the Company. We cannot and will not be held responsible or liable for any unauthorized use of your personal information that is collected in this manner. Please, for your own safety, be aware of when and how you share your personal information online.

### **Protecting and Keeping your Information Secure**

No matter how hard we try, or how much money we invest in cyber-security, it is unfortunate that there are no guarantees when it comes to the transmission or storage of electronic data online.

Here at the Company, we use Dropbox Business Edition to transmit and store your data and are committed to securing your personal information. The service providers we use have taken appropriate technological and organizational measures to help protect your personal information from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction.

Click here to read about how your information is stored securely:

<https://www.dropbox.com/security>

For more information, or to read the full privacy policy of the third party vendor we use to store your information, [click here](#).

Notwithstanding the above, we cannot guarantee the absolute security of your personal information. We may work with other third-party vendors on various projects related to managing our databases, operating the Website, standard operating procedures and protocols, overall web security, etc. There is always the possibility that your personal information, while being transmitted to or from us over the Internet, could be intercepted.

**A Note About Email:** Email is not secure. We will never transmit sensitive data such as full credit card numbers, social security numbers, etc. over email and expect that you will not do so either. If you provide any personal information to us via email, we cannot guarantee its safety and will not be responsible if it is intercepted or stolen by third parties.

### **Our Policy Toward Children**

Our products and services are not directed to individuals under the age of 18 and we do not and will not knowingly collect any information from any individual who is under 18. If you become aware that a child has provided us with their personal information, please contact us at [qhc@quaternaryconsultant.com](mailto:qhc@quaternaryconsultant.com). If we otherwise become aware that a child under the age of 18 has provided us with their personal information, we will take all reasonable steps to delete their information from our servers and database as soon as possible.

### **Third-Party Websites**

We cannot and do not control, nor are we responsible for the privacy practices of the vendors we have chosen to work with. From time to time, in our products and services, we may provide links to affiliates, sponsors, business partners, advertisers, vendors, or other websites and resources that we believe would be beneficial to you. If you decide to visit those sites, please understand that you alone are responsible for reviewing the terms of service and privacy policies of any site you visit, including those recommended by us.

### **For Residents of California**

#### *Do Not Track Notice*

We hereby disclose, pursuant to the California Online Privacy Protection Act, that we do NOT currently honor “do not track” signals issued by browsers or other third-party sources.

#### *For Minors in California*

If you are a minor, under the age of 18, and you have provided personal information or content to us in some manner, you have the right to request that we delete that

information pursuant to the “California Eraser Law.” You may contact us at [qhc@quaternaryconsultant.com](mailto:qhc@quaternaryconsultant.com) to make such a request.

### **If you are from Outside the U.S.**

Our Company, our Website, and all data that we store on servers and via third parties are all located in the United States. Even though the information we provide online is available worldwide, the internet laws of the United States shall govern all issues and matters related to this Website and information and materials it provides, whether paid or free. By using our Website and providing your personal information, you understand and expressly authorize the transfer of your Personal Data to the United States.

### **The European Union and GDPR**

Residents of the European Union (hereafter the “EU”) receive additional protections by virtue of the General Data Protection Regulation (the “GDPR”) which went into effect in 2018. Residents of the EU have a number of enumerated rights, which include the right:

- to transparent information (i.e. to know what information we collect from you);
- to object to the collection or processing of certain information;
- to withdraw consent, *even after it has been given*, without affecting the lawfulness of the processing of your data prior to withdrawing your consent;
- to access your data and information;
- to rectification, i.e. to modify or update your information;
- to erasure or to be forgotten by requesting that your information is deleted;
- to data portability; and,
- to restrict processing of your data.

Our website and the products and services we provide are directed towards citizens and residents of the United States. However, all of our website visitors, regardless of where they may be when they access our Website, are afforded the rights and protections outlined above.

Our lawful basis for collecting your data is described previously in this privacy policy. Where consent forms the basis for collecting your data, please note that you may withdraw your consent at anytime by clicking on the “unsubscribe” link in the email or otherwise contacting our office at [qhc@quaternaryconsultant.com](mailto:qhc@quaternaryconsultant.com) to have your information update, corrected, deleted or to obtain a copy of the information for your records.

We will keep your data only as long as is reasonably required to accomplish the purpose or purposes for which it was collected. However, for certain customers or

clients, we may keep your data for longer or shorter periods of time depending on whether or not you have purchased products and services through our Website. In addition, we may keep your data for longer periods of time if you are regularly engaging with the emails we send you. “Cold” subscribers, defined as someone who hasn't opened or clicked an email in the last 90 days and has been subscribed to our email list for at least 30 days will be purged from our system on a regular basis, but no less than once every six (6) months.

If you have any concerns, questions or otherwise feel that we are not properly complying with any relevant data protection regulations, we invite you to reach out to us via email at [qhc@quaternaryconsultant.com](mailto:qhc@quaternaryconsultant.com) with the following information:

- Your Name;
- Your Country of Origin; and,
- A brief summary of your concern or complaint.

We will make every effort to respond as quickly as we can to your concerns. If, after contacting us, you feel that your privacy issue has not be resolved, you have the right to file a complaint with a Supervisory Authority such as [those listed here](#).

### **Changes to Our Privacy Policy**

From time to time we may update this Privacy Policy to both protect our Website Visitors and comply with an ever-changing global regulatory environment. Please remember to review this policy frequently when you visit our Website. We will never change our policies to make the safeguarding of your personal information less protective than it has been in the past. You are deemed to have accepted this Policy and any amendments thereto when you continue to access this Website and/or purchasing or using our products and services. We will update the date at the top of this page whenever we make any changes to this policy.

### **Contact Information**

If you need to contact us, you may do so by emailing us directly to [qhc@quaternaryconsultant.com](mailto:qhc@quaternaryconsultant.com). Please put “privacy policy” in the subject line of your message.

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