

## Overview

This Privacy Policy explains how information is collected, used, and disclosed by EDCOM HQ (“**EDCOM**”) and applies to information collected when you use or access EDCOM HQ’s website at [www.edcomhq.com](http://www.edcomhq.com) (the “**EDCOM Website**”) or when your information is submitted to EDCOM by our customers via the services we offer to them (our “**Product**”) (collectively, the “**EDCOM Service**”). We respect the privacy rights of users and recognize the importance of protecting information collected about you.

Please read the following carefully to understand how we will collect, use, and maintain your personal information. It also describes your choices regarding the use, access, and correction of your personal information.

## Changing our Policy

We may change this Privacy Policy from time to time. If we make any changes, we will revise the "Last Updated" date at the end of this Privacy Policy and, in some cases, we may provide you with additional notice (such as adding a statement to our homepage or sending you an email notification). If there are material changes to this Privacy Policy, we will notify you more directly by email or means of a notice on the home page prior to the change becoming effective. We encourage you to review our Privacy Policy whenever you access the EDCOM HQ Service to stay informed about our information practices and the ways you can help protect your privacy.

If you disagree with any changes to this Privacy Policy and do not wish your information to be subject to the revised Privacy Policy, you will need to deactivate your account with us and stop using the EDCOM HQ Service. Your use of the EDCOM HQ Service after the posting of such changes shall constitute your consent to such changes.

## Information Collected

We may collect certain user information (including personal information and/or sensitive personal information) in the following ways.

**Information You Provide To Us.** We collect information you provide directly to us including when you visit our websites and/or use the EDCOM HQ Product.

For example, we collect information when you enter into an agreement with EDCOM HQ as a customer, create or modify your profile and account, access and use the EDCOM HQ Service (including but not limited to when you upload, download, or share information), participate in any interactive features of the EDCOM HQ Service, submit a contact form, participate in a survey, activity or event, apply for a job, request customer support, or

communicate with us via third-party social media sites. You may, however, visit our website anonymously.

The types of information we may collect directly from you include your name, username, email address, postal address, phone number, information about your Product account preferences, employer's name, job title, transactional information (including services purchased or subscribed to and billing address), your registration for and attendance at events, video of events you attend which may include your image and voice, your newsletter subscriptions, as well as any contact or other information you choose to provide. Please be aware that the information you choose to provide in your EDCOM HQ Product account profile may reveal or identify information that is not expressly stated (for example, information you provide may reveal your gender). We also store information that you upload or provide to the EDCOM HQ Services ("**Content**") in order to provide you with the features and functionality of the EDCOM HQ Service.

**Information We Collect Automatically When You Use the EDCOM HQ Service.** When you access or use the EDCOM HQ Service, we may automatically collect information about you, including:

**Usage, Log, and Device Information:** We collect information from your use of the EDCOM HQ Service such as system activity, hardware settings, browser type, browser language, the date and time of your visit, and the referral URL. We monitor user activity in connection with the EDCOM HQ Service and may collect information about the features you use, the Content you upload, download, share, or access while using the EDCOM HQ Service, the Content you access, and any actions taken in connection with the access and use of your Content in the EDCOM HQ Service.

**Information Collected by Cookies and Other Tracking Technologies:** A cookie is a small file containing a string of characters that is sent to your computer when you visit a website. When you visit the website again, the cookie allows that site to recognize your browser. Cookies may store user preferences and other information. You can set your browser to refuse all cookies or to indicate when a cookie is being sent. However, some website features or services may not function properly without cookies. We use cookies to understand and save your preferences for future visits and compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. We may contract with third-party service providers to assist us in better understanding our site visitors. These service providers are not permitted to use the information collected on our behalf except to help us conduct and improve our business.

## Use of Information

We may use the information collected through the EDCOM HQ Service for the limited purpose of providing the EDCOM HQ Service and related functionality and services for which EDCOM HQ has been engaged. The information may be used for a variety of purposes, including:

Provide, operate, maintain, and improve the EDCOM HQ Service;  
Enable you to access and use the EDCOM HQ Service;  
Send you technical notices, updates, security alerts, and support and administrative messages;  
Provide and deliver the services and features you request, process, and complete transactions, and send you related information, including purchase confirmations and invoices;  
Respond to your comments, questions, and requests, and provide customer service and support;  
Communicate with you about services, features, surveys, newsletters, offers, promotions, events, and provide other news or information about EDCOM HQ and our select partners;  
Process and deliver survey entries and rewards;  
Monitor and analyze trends, usage, and activities in connection with the EDCOM HQ Service and for marketing or advertising purposes;  
Investigate and prevent fraudulent transactions, unauthorized access to the EDCOM HQ Service, and other illegal activities;  
Personalize and improve the EDCOM HQ Service, and provide content and/or features that match your interests and preferences or otherwise customize your experience on the EDCOM HQ Service; and  
For other purposes about which we notify you.

Additionally we may disclose personal data in special cases when we have a good faith belief that such action is necessary to: (a) conform to legal requirements or to respond to lawful requests by public authorities, including to meet national security or law enforcement requirements; (b) protect and defend our rights or property; or (c) act to protect the interests of our users or others.

**Do Not Track.** Some browsers offer a “do not track” (“DNT”) option. Because no common industry or legal standard for DNT has been adopted by industry groups, technology companies, or regulators, we do not respond to DNT signals. We will make efforts to continue to monitor developments around DNT browser technology and the implementation of a standard.

## Sharing and Disclosure of Information

We will not share personal information about you or any Content with any third parties without your consent except as described in this Privacy Policy, or as defined in an agreement with us, in connection with the EDCOM HQ Service. For example, we may share personal information about you:

**To Vendors, Consultants, and Other Service Providers:** We may share your information with third-party vendors, consultants, and other service providers who are working on our behalf and require access to your information to carry out that work, such as to process

billing or as it relates to a Product feature. These service providers are authorized to use your personal information only as necessary to provide services to EDCOM HQ.

**In Compliance with Laws:** We may disclose your information to a third party: (a) if we believe that disclosure is reasonably necessary to comply with any applicable law, regulation, legal process, or governmental request; (b) to enforce our agreements and policies; (c) to protect the security or integrity of the EDCOM HQ Service; (d) to protect EDCOM HQ, our customers, or the public from harm or illegal activities; (e) to respond to an emergency which we believe in the good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person; or (f) as otherwise directed by you.

**For Business Transfers:** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company. You may be notified thereafter via email of any such change in ownership or control of your personal information.

**As Aggregated and/or Anonymized Data:** We may also share aggregated and/or anonymized information with third parties that does not directly identify you.

## Global Data Privacy Protection

EDCOM HQ self-certifies under the EU-U.S. Privacy Shield and the Swiss – U.S. Privacy Shield frameworks as set forth by the U.S. Department of Commerce (collectively “**Privacy Shield**”) regarding the collection, use and retention of personal information from all European Union member countries and Switzerland. To learn more about the Privacy Shield program, and to view our certifications, please visit <https://www.privacyshield.gov>. We subject to the principles of the Privacy Shield all personal data that we receive from individuals and companies in the European Union and Switzerland in reliance on the Privacy Shield. We also receive some data in reliance on other compliance mechanisms, including data processing agreements based on the EU Standard Contractual Clauses.

**Access:** If you have any questions regarding our compliance with the Privacy Shield, or need to update, change or remove information, please contact [info@EDCOMHQ.com](mailto:info@EDCOMHQ.com). We will respond to your request to access or delete your information within 30 days.

**Liability in cases of onward transfers:** If a third party service provider providing services on our behalf processes personal data from the European Union or Switzerland in a manner inconsistent with the Privacy Shield, we will be liable unless we can prove that we are not responsible for the event giving rise to the damages.

**Investigatory and enforcement powers of the Federal Trade Commission:** We are subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission with regard to our compliance with this policy and Privacy Shield.

**Arbitration:** If you have exhausted all other means to resolve your concern regarding a potential violation of our obligations under the Privacy Shield, you may seek resolution via binding arbitration. For additional information about the arbitration process please visit the Privacy Shield website: [www.privacyshield.gov](http://www.privacyshield.gov).

## General Data Protection Regulation

EDCOM HQ complies with the General Data Protection Regulation ("GDPR") with respect to personal data it receives in connection with the EDCOM HQ Service.

In some situations, EDCOM HQ may act as a data controller under GDPR. For example, if you sign up to attend an event via the CMX Website, we may be a controller with respect to the personal data you share with us. In these situations, we will only collect and process personal data about you where we have lawful bases. Lawful bases include consent (where you have given consent), contract (where processing is necessary for the performance of a contract with you), and "legitimate interests." Where we rely on your consent to process personal data, you have the right to withdraw or decline your consent at any time and where we rely on legitimate interests, you have the right to object. If you have any questions about the lawful bases upon which we collect and use your personal data, please contact us at [info@EDCOM HQ.com](mailto:info@EDCOM HQ.com).

In other situations, EDCOM HQ may act as a data processor under GDPR. For example, if a company contracts with EDCOM HQ for access to the EDCOM HQ Service, and in the course of that relationship shares personal data with EDCOM HQ, the company may be the controller with respect to such data, and EDCOM HQ may be a processor. In such situations, EDCOM HQ will enter into a data processing agreement with such company governing both party's compliance with GDPR.

## Security

You may access your Product account information and our service only through the use of an individual user ID and password. To protect the confidentiality of personal information, you must keep your password confidential and not disclose it to any other person. Please advise us immediately if you believe your password has been compromised in any way. In addition, always log out and close your browser when you finish your session. Please note that we will never ask you to disclose your password to us.

If you have any questions about the security of your personal information, you can contact us at [info@EDCOM HQ.com](mailto:info@EDCOM HQ.com).

## Your Choices

**Account Information and Retention.** You may update, correct, or delete information about you at any time by logging into your Product account and modifying your information, or by emailing us at [info@EDCOM HQ.com](mailto:info@EDCOM HQ.com). We will retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy. If you wish to deactivate your Product account, please email us at [info@EDCOM HQ.com](mailto:info@EDCOM HQ.com), but note that we may retain certain

information as required by law or for legitimate business purposes. We may also retain cached or archived copies of information about you for a certain period of time. We will respond to your access request within 30 days.

We will retain your information for as long as your Product account is active or as needed to provide you with the EDCOM HQ Service. We will retain and use your information to comply with our legal obligations, resolve disputes, and enforce our agreements.

We will retain personal data we process on behalf of our customers as directed by paying customers. EDCOM HQ will retain this personal information as necessary to comply with legal obligations, resolve disputes, and enforce agreements.

Upon request, EDCOM HQ will provide you with information about whether we hold, or process on behalf of a third party, any of your personal information that we are aware of. To request this information, contact us at [info@EDCOMHQ.com](mailto:info@EDCOMHQ.com).

**Promotional and Newsletter Communications.** You may opt out of receiving promotional and newsletter emails from EDCOM HQ by following the opt-out instructions provided in those emails. You may also opt-out of receiving promotional emails and other promotional communications from us at any time by emailing [info@EDCOMHQ.com](mailto:info@EDCOMHQ.com) with your specific request. If you opt out, we may still send you non-promotional communications, such as security alerts and notices related to your access to or use of the EDCOM HQ Service or those about your Product account or our ongoing business relations.

**Cookies.** Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies or to prompt you before accepting such a cookie. Please note that, if you choose to remove or reject browser cookies, this could affect the availability or functionality of the EDCOM HQ Service.

**California Residents.** Under California law, California Residents who have an established business relationship with EDCOM HQ may choose to opt out of EDCOM HQ's disclosure of personal information about them to third parties for direct marketing purposes. If you choose to opt out at any time after granting approval, email [info@EDCOMHQ.com](mailto:info@EDCOMHQ.com). Because we value your privacy, we have taken the necessary precautions to be in compliance with the **California Online Privacy Protection Act**. We therefore will not distribute your personal information to outside parties without your consent. In accordance with California Civil Code Section 1789.3, California resident users are entitled to know that they may file grievances and complaints with the California Department of Consumer Affairs, 400 R Street, STE 1080, Sacramento, CA 95814; or by phone at (916) 445-1254 or (800) 952-5210; or by email to [dca@dca.ca.gov](mailto:dca@dca.ca.gov).

## Links to Third-Party Websites

We may place links on the EDCOM HQ Service, including the EDCOM HQ blog. When you click on a link to a third-party website from our Website, your activity and use on the linked website is governed by that website's policies, not by those of EDCOM HQ. We encourage you to review their privacy and user policies.

## Our Policy Toward Children

The EDCOM HQ Service is not directed to individuals under 16. We do not knowingly collect personal information from children under 16. If you become aware that a child has provided us with personal information, please contact us at [info@EDCOMHQ.com](mailto:info@EDCOMHQ.com). If we become aware that a child under 16 has provided us with personal information, we will take steps to delete such information. Please note, if you are under the age of 16, you may not use our website, products, or services.

## Contacting Us

Any questions about this Privacy Policy should be addressed to [info@EDCOMHQ.com](mailto:info@EDCOMHQ.com) or to: [teachindynow@gmail.com](mailto:teachindynow@gmail.com)