

Illuminate Consulting Group (“ICG”) Privacy Policy

Release Date: 22 April 2019

Scope: Worldwide

Basis I: Adapted from a GDPR-compliant privacy notice provided at
<https://gdpr.eu/wp-content/uploads/2019/01/our-company-privacy-policy.pdf>

Basis II: Privacy Shield regulations as listed at <https://www.privacyshield.gov>

Website and General Privacy Policy

Introduction

This privacy policy will explain how our organization uses personal data ICG collects from you when you use ICG's website, or which you share with us directly.

Topics

- What data do we collect?
- How do we collect your data?
- How will we use your data?
- How do we store your data?
- Marketing
- What are your data protection rights?
- What are cookies?
- How do we use cookies?
- What types of cookies do we use?
- How to manage your cookies
- Privacy policies of other websites
- Changes to our privacy policy
- How to contact us
- How to contact the appropriate authorities

What data do we collect?

Our Company collects the following data:

- Personal identification information (name, e-mail address, phone number, etc.)

How do we collect your data?

You directly provide Our Company with most of the data we collect. We collect data and process data when you:

- Register online or place an order for any of ICG's products or services.
- Voluntarily complete a customer survey or provide feedback on any of ICG's message boards or via e-mail.
- Use or view ICG's website via your browser's cookies.
- Share data with ICG directly.

How will we use your data?

Our Company collects your data so that we can:

- Process your order, manage your account.
- E-mail you with special offers on other products and services we think you might like.
- Analyze your data for the purpose of delivering ICG services.
- If you agree, Our Company will share your data with our partner companies so that they may offer you their products and services, unless prohibited by a contractual agreement.
- When ICG processes your order, it may send your data to, and also use the resulting information from, credit reference agencies to prevent fraudulent purchases.

How do we store your data?

ICG securely stores your data at our main headquarter in San Carlos, California. ICG uses layered security protocols to safeguard data, including password access, encryption, and security software. ICG uses industry standard backup protocols and providers.

ICG will keep your inquiry, communication, and correspondence without an end date if directed at ICG directly. ICG will keep web-based transaction data for a period of 10 years. Once this time period has expired, we will delete your data.

Marketing

ICG would like to send you information about products and services of ours that we think you might like, as well as those of our partner companies. If you have agreed to receive marketing, you may always opt out at a later date. You have the right at any time to stop ICG from contacting you for marketing purposes or giving your data to other members of ICG. If you no longer wish to be contacted for marketing purposes, please send an e-mail to info@illuminategroup.com.

What are your data protection rights?

ICG would like to make sure you are fully aware of all of your data protection rights. Every user or client is entitled to the following:

- The right to access - You have the right to request ICG for copies of your personal data. We may charge you a small fee for this service.
- The right to rectification - You have the right to request that ICG correct any information you believe is inaccurate. You also have the right to request ICG to complete information you believe is incomplete.
- The right to erasure - You have the right to request that ICG erase your personal data, under certain conditions.
- The right to restrict processing - You have the right to request that ICG restrict the processing of your personal data, under certain conditions.
- The right to object to processing - You have the right to object to ICG's processing of your personal data, under certain conditions.
- The right to data portability - You have the right to request that ICG transfer the data that we have collected to another organization, or directly to you, under certain conditions.
- If you make a request, ICG has one month to respond to you. If you would like to exercise any of these rights, please contact us by e-mail at info@illuminategroup.com, or call us at +1 619 295 9600, or write us at P.O. Box 262, San Carlos, CA 94070, USA.

What are cookies?

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit ICG's websites, we may collect information from you automatically through cookies or similar technology. For further information, visit allaboutcookies.org.

How do we use cookies?

Our Company uses cookies in a range of ways to improve your experience on our website, including:

- Keeping you signed in
- Understanding how you use our website
- [Add any uses your company has for cookies]

What types of cookies do we use?

There are a number of different types of cookies, however, our website uses:

- **Functionality** - ICG uses these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.
- **Advertising** - Our Company uses these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device, and your IP address. Our Company sometimes shares some limited aspects of this data with third parties for advertising purposes. We may also share online data collected through cookies with our advertising partners. This means that when you visit another website, you may be shown advertising based on your browsing patterns on our website.

How to manage cookies

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

Privacy policies of other websites

The ICG website contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

Changes to our privacy policy

ICG keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 22 April 2019.

How to contact us

If you have any questions about ICG's privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us. Email us at info@illuminategroup.com, call us at +1 619 295 9600, or write to us at P.O. Box 262, San Carlos, CA 94070, USA

How to contact the appropriate authority

Should you wish to report a complaint or if you feel that Our Company has not addressed your concern in a satisfactory manner, you may contact JAMS Mediation, Arbitration and ADR Services ("JAMS"). JAMS can be reached by phone at +1 800 352 5267, by web-based email at [www.jamsadr.com/contact?location=Silicon%20Valley,%20California%20\(Northern\)](http://www.jamsadr.com/contact?location=Silicon%20Valley,%20California%20(Northern)), and by mail at 160 West Santa Clara Street, Suite 1600, San Jose, CA 95113, USA

Privacy Shield Regulations pertaining to EU-U.S. Data Privacy: Notice

ICG participates in the Privacy Shield, please see <http://www.privacyshield.gov/list> (pending approval).

ICG processes data from clients residing in the EU and Switzerland which may contain personal and / or HR-related data. This pertains to staff personnel files, student registrarial records, alumni records, external collaborators and employers, and related records.

ICG is committed to subject to the Principles all personal data received from the EU and/or Switzerland in reliance on the Privacy Shield,

ICG uses personal information such as the above listed as part of client commissioned projects with the express consent of the owner of said data.

Any questions, inquiries, or complaints should be directed to ICG by e-mail at info@illuminategroup.com, or fax at +1 650 860 6110.

ICG does not disclose the aforementioned data to any third parties with the exception of the original owner(s) of the data.

Individuals are advised to first contact the original owner of any data ICG may hold on them with regards to pertinent rules and regulations for accessing records from either the original owner and/or ICG.

ICG processes personal and/or HR-related data based on structures, formats, and confidentiality rules of their original owners. The legal rules and entitlement of the original owners supersede any of ICG's rules. ICG does not disclose any personal and/or HR-related data to any third party expect to the original owner.

ICG, under the EU-U.S. Privacy Shield, has nominated JAMS, a U.S.-based alternative dispute resolution provider, as the independent dispute resolution body designated to address complaints and provide appropriate recourse free of charge to the individual.

ICG, under the Swiss-U.S. Privacy Shield, has nominated JAMS, a U.S.-based alternative dispute resolution provider, as the independent dispute resolution body designated to address complaints and provide appropriate recourse free of charge to the individual.

ICG is subject to the investigatory and enforcement powers of the FTC, the Department of Transportation, or any other U.S. authorized statutory body.

Individuals may have the possibility, under certain conditions, to invoke binding arbitration.

ICG may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements, and its liability in cases of onward transfers to third parties.