

Privacy Policy and Notice at Collection

Last Updated: December 15, 2022

I. Introduction

This Privacy Policy ("**Policy**") describes how Callie Pappas Global Consulting, LLC ("**CPGC**" or "**we**" or "**us**") handles the Personal Information it collects online. Unless otherwise noted, the information in this Policy that describes how and why we collected, used, and disclosed information within the past 12 months also describes the information we will collect and how we will use it. For purposes of this Policy, personal information ("**PI**") means information that identifies, relates to, describes, can reasonably be associated with, or could reasonably be linked, directly or indirectly, with you or your household.

This Policy applies to interactions you may have with CPGC in your individual capacity or in your capacity as an employee, owner, director, officer, or independent contractor of another company, partnership, sole proprietorship, non-profit, or government agency (collectively, "Entity") that does business with us.

We may change the terms of the Policy from time to time. When we make changes, we will post the amended policy on this website ("**Site**"). If the changes are material, we will post a notice on the Site alerting you to the change. Any changes to the Policy will become effective immediately upon our posting of the Policy, so please review the current Policy before providing us with PI.

II. What Personal Information CPGC Collects and Why We Collect It

Within the past 12 months, we collected these categories of PI (whether we collected a specific category of information about you depends on your interaction with us):

Category of Personal Information	Purposes for Collection, Use, and Disclosure
Identifiers including your real name, alias, postal address, unique personal identifier, online identifier, IP address, email address, account name, or other similar identifiers	<ul style="list-style-type: none">▪ To communicate with you, including in response to your inquiries and to fulfill your requests▪ To provide you with information about our products and services, and to provide products or services you have requested from us, for yourself or on behalf of an Entity you are affiliated with▪ To manage our operations and business, such as for tax, compliance, and accounting purposes▪ To conduct business with an Entity you are affiliated with▪ To manage the security and integrity of our premises, systems, and data

Category of Personal Information	Purposes for Collection, Use, and Disclosure
<p>Personal Information described in Cal. Civ. Code § 1798.80(e) (“Customer Records” information), including your name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or other financial information, medical information, or health insurance information</p>	<ul style="list-style-type: none"> ▪ To communicate with you, including in response to your inquiries and to fulfill your requests ▪ To provide you with information about our products and services, and to provide products or services you have requested from us, for yourself or on behalf of an Entity you are affiliated with ▪ To manage our operations and business, such as for tax, compliance, and accounting purposes ▪ To conduct business with an Entity you are affiliated with ▪ To manage the security and integrity of our premises, systems, and data
<p>Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies</p>	<ul style="list-style-type: none"> • To communicate with you, including in response to your inquiries and to fulfill your requests • To provide you with information about our products and services, and to provide products or services you have requested from us for yourself or on behalf of an Entity • To manage our operations and business, such as for tax, compliance, and accounting purposes • To conduct business with an Entity you are affiliated with ▪ To manage the security and integrity of our premises, systems, and data
<p>Internet or other electronic network activity information, including browsing history, search history, and information regarding your interactions with our website, mobile applications, or advertisements—this may include hardware and browser information of your computer or other online device</p> <p>See “Information We Collect Automatically Online” below for additional information</p>	<ul style="list-style-type: none"> ▪ To communicate with you, including in response to your inquiries and to fulfill your requests ▪ To provide you with information about our products and services, and to provide products or services you have requested from us for yourself or on behalf of an Entity ▪ To manage our operations and business, such as for tax, compliance, and accounting purposes ▪ To conduct business with an Entity you are affiliated with ▪ To manage the security and integrity of our premises, systems, and data
<p>Geolocation data, including location data inferred from your device IP address when you visit our website</p>	<ul style="list-style-type: none"> ▪ To communicate with you, including in response to your inquiries and to fulfill your requests ▪ To provide you with information about our products and services, and to provide products or services you have requested from us for yourself or on behalf of an Entity ▪ To conduct business with an Entity you are affiliated with ▪ To manage the security and integrity of our premises, systems, and data

Category of Personal Information	Purposes for Collection, Use, and Disclosure
<p>Inferences drawn from other PI and used to create a profile reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p>	<ul style="list-style-type: none"> • To provide you with information about our products and services, and to provide products or services you have requested from us for yourself or on behalf of an Entity • To manage the security and integrity of our premises, systems, and data

We may also collect, use, or disclose the personal information described above for other purposes authorized by applicable laws, including:

- internal data analysis and product development;
- compliance with law enforcement requests or legal process;
- to detect, investigate, prevent, or otherwise address fraud or other security and integrity issues, or to maintain the security and integrity of our products and services (including investigating and responding to ethics complaints);
- to exercise or defend against legal claims, including investigating those claims;
- compliance with applicable laws and regulations; or
- as part of a corporate transaction or proceeding such as a merger, financing, acquisition, bankruptcy, dissolution, or at transfer, divestiture, or sale of all or a portion of our business or assets.

III.Sources of Personal Information

CPGC collects PI about you when you actively provide it to us, such as by completing an online form or sending us an email. We also may collect PI about you from other sources, such as our business partners and affiliates; the Internet or publicly available sources, including social media websites; the press or other print media; from parties to corporate transactions; service providers and suppliers; and other organizations or individuals as permitted under applicable law.

IV.Information We Collect Automatically Online

When you visit our Site, we will collect the following information automatically:

- Technical information, including the internet protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system, and platform; and
- Information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from the Site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages,

page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

We may obtain this information via server logs, cookies (small data files your web browser stores on your hard drive), web beacons (small electronic images used to count web page views) or other commonly used mechanisms.

Our Site uses cookies to distinguish you as a Site user from other users of our Site. This helps us to provide you with a good experience when you browse our Site and allows us to improve the Site. Every time you return to a Site you previously visited, the browser retrieves the cookie and sends it to the Site's server. We also use cookies that remember the pages you have visited and the links you have followed, which we use and may share with third parties to help make our Site more relevant to your interests. And more broadly, we use cookies to see how many visitors are on our Site and how visitors move around the Site. These cookies help us improve the way the Site work, for example, by ensuring that users are finding what they are looking for easily.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies, you may not be able to access all or parts of our Site. To learn more about cookies, please visit www.allaboutcookies.org/.

By using the Site, you are deemed to unambiguously agree to its use of any cookies that you do not disable.

We also use tools such as Google Analytics (which in turn uses cookies) to learn more about Site visitor preferences and activities when using the Site. Google Analytics uses cookies to collect information about Site visitors to provide analytics services based on a user's visits to sites across the Internet and across other mobile applications. For further information about the collection and use of data through Google Analytics, see www.google.com/policies/privacy/partners/. Google offers the ability to opt out from tracking through Google Analytics cookies; to learn about this, visit: tools.google.com/dlpage/gaoptout.

Our Site do not respond to a user's Do-Not-Track request.

V. Who We Disclose Personal Information To

We have disclosed, or may disclose, each category of PI described above to these categories of recipients:

- to our service providers, whom we engage to assist us with technology support, operational support, and other forms of assistance, and whom we bind by contract to protect the confidentiality and security of the PI we share with them;
- in the event of a proposed or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our company or its assets, to the proposed or actual acquiring party or assignee;
- to law enforcement agencies, courts, and regulatory agencies when the disclosure is required or permitted by law, including to comply with valid legal process; or
- to other parties as we believe to be appropriate (i) when required by applicable law, including laws outside your country of residence; (ii) to comply with legal process (iii) to respond to requests from public and government authorities; (iv) to enforce the terms and conditions for use of the Site, including this Policy; (v) to protect and defend our rights and property; (vi) to protect the interests of CPGC or others; and (vii) to permit us to pursue available remedies or limit the damages that we may sustain.

We do not sell PI and we do not share PI with non-affiliated entities for them to use for their own marketing purposes.

VI. Additional Disclosures and Rights for Residents of California

This section provides additional disclosures and describes additional rights applicable to residents of California under the California Consumer Privacy Act ("CCPA"), as amended. Capitalized terms in this section have the same meaning as the matching terms defined in the CCPA.

You have the right not to be discriminated against for exercising your CCPA rights.

A. Right to Opt Out of Sales and Sharing of Personal Information

Within the preceding 12 months, we Shared identifiers, commercial information, geolocation information, internet or other electronic network activity information, or inferences for marketing and advertising purposes with advertising and digital analytics companies, social media platforms, and data analytics firms.

You may opt out of the Sharing of your Personal Information by adjusting your Cookie Settings through the "Cookie Settings" link in the footer of our website. We do not Sell your Personal Information.

B.Sensitive Personal Information

We do not collect Sensitive Personal Information for the purpose of inferring characteristics about you. We do not use or disclose Sensitive Personal Information for purposes to which the right to limit use and disclosure applies under the CCPA.

C.Right to Know, Delete, and Correct

The CCPA gives California Consumers certain rights. Where required, we will ask you to verify your identity before honoring your requests (this includes for requests made by authorized agents).

Right to Know. If you are a California resident, you have the right to request that we provide you with the following information:

- The categories and specific pieces of Personal Information we have Collected about you in the last 12 months.
- The categories of sources from which we Collect Personal Information.
- The Business or Commercial Purposes for Collecting, using, Sharing or Selling Personal Information.
- The categories of Personal Information we have disclosed about you for a Business Purpose and the categories of recipients to which it was disclosed.
- The categories of Personal Information we Sold or Shared about you and the categories of Third Parties to which each category of Personal Information was Sold or Shared.

Right to Delete. You have the right to request that we delete Personal Information under certain circumstances, subject to several exceptions.

Right to Correct. You have the right to request that we correct Personal Information that we maintain about you if you believe it is inaccurate. We may request documentation from you in connection with your request. Upon receipt of a verifiable request to correct inaccurate Personal Information, we will use commercially reasonable efforts to correct the Personal Information.

D.How to Submit a Request

To exercise the rights described above, please submit a request to us by:

Calling us at: (971) 470-0655

Emailing us at: callie@calliepappas.com

VII. Additional Disclosures and Rights for Residents of Virginia

This section applies to Virginia consumers, as defined by the Virginia Consumer Data Protection Act (“VCDPA”), that access or use our products or services. This section describes our collection, use, and disclosure of “Personal Data” (as defined in the VCDPA). You can learn about the categories of Personal Data we process, the purpose for processing your Personal Data here, and the categories of third parties with whom we disclose Personal Data by reviewing the relevant section of this notice, above. We may process your Personal Data for Targeted Advertising (as the term is defined in the VCDPA).

If you are a Virginia resident, subject to certain conditions and restrictions set out in the VCDPA and other applicable laws, you have the following rights regarding your Personal Data:

Right to Access. You have the right to request access to and obtain a copy of any personal data we may hold about you.

Right to Correct. You have the right to request that we correct inaccuracies in your personal data.

Right to Delete. You have the right to request that we delete personal data we have collected from or obtained about you.

Right to Opt Out of Targeted Advertising. You have the right to request that we stop disclosures of your personal data for targeted advertising. You may opt out of Targeted Advertising by adjusting your Cookie Settings through the “Cookie Settings” link in the footer of our website.

Right to Opt Out of Sales. You have the right to opt out of our Sales of your Personal Data. Please note that we do not Sell your Personal Data.

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 are unsatisfied with our actions related to the exercise of one of your privacy rights above, you may appeal our decision.

How to Exercise your Rights. You may exercise your privacy rights under the VCDPA no more than twice in a 12-month period. Virginia residents may exercise their privacy rights by:

Calling us at: (971) 470-0655

Emailing us at: callie@calliepappas.com

If you exercise the privacy rights described above, you will not receive discriminatory treatment from us.

VIII. Data Retention; Security

We keep the categories of PI described above for as long as is necessary for the purposes described in this Policy or otherwise authorized by law.

This generally means holding each category of information for as long as one of these criteria apply:

- whether your PI is reasonably necessary to manage our operations, to manage your relationship with us, or to satisfy another purpose for which we collected the information;
- whether your PI is reasonably necessary to carry out a disclosed purpose that is reasonably compatible with the context in which the personal information was collected;
- whether the PI is reasonably required to protect or defend our rights or property (which will generally relate to applicable laws that limit actions in a particular case); or
- whether we are otherwise required or permitted to keep your PI by applicable laws or regulations.

Where PI is used for more than one purpose, we may retain it until the purpose with the latest period expires. For more information about our retention policies, please contact us using the contact details below.

We endeavor to use reasonable organizational, technical, and administrative measures to protect the PI we maintain within our organization.

IX.Site Use Limitations and International Visitors

Our Site is not directed to users under the age of 18 and we do not knowingly collect PI online from any person we know to be under the age of 18.

Our Site is designed for users from, and are controlled and operated by us from, the United States, which may have different data protection rules than those of your country.

X.Links to Other Websites

Our Site may provide links to third-party websites. When you click on one of these links, you will be accessing content that is not subject to this Policy. We are not responsible for the information-collection practices of the other websites that you visit and advise you to review their privacy policies before you provide them with any PI.

XI.How to Contact Us

If you have questions regarding this Policy, please call us at (971) 470-0655, or email us at callie@calliepappas.com