

## **MINDWIRE PRIVACY POLICY**

### Privacy Policy

#### Effective Date:

MindWire, Inc. ("MindWire") takes your privacy and the security of your information very seriously, and we encourage you to read this privacy policy carefully to understand how we collect and handle your information. This policy describes information our website collects from you, and the steps we have taken to protect that information.

MindWire collects personal information you share with us when using our website. This information may include your name, company name telephone number and email address and other information, when you use our website. **Note to MindWire:** We use this information to improve the relevance of our communication and to enhance the quality of our website. The Federal Trade Commission has jurisdiction over MindWire's compliance with the Privacy Shield.

### **WHAT DOES MINDWIRE DO?**

MindWire predicts and improves performance on the most important, vexing challenge for any organization--the people. We use science and data to provide clients measurable, performance driven tools and capabilities so you can finally put hard data to work on the soft side of the business.

That's Human Capital. Optimized.

### **WHAT INFORMATION DOES MINDWIRE COLLECT FROM ME?**

MindWire collects certain information from you when you share that information with us through our website.

- **Personal Information:** When you visit our website, MindWire may collect certain types of personal information which may include but is not limited to contact information, usage data, cookies and tracking technologies.
- **Analytics Information:** MindWire has partnered with select analytics partners ("Analytics Partners") to collect information about how our website is used. Our Analytics Partners may collect information about how many times you visit our website, what you visit when you explore our website, what parts of our website you access, and what other sites you visit before and after visiting our website. You can learn more about our Analytics Partners by clicking [\[here\]](#). **[Note to MindWire:** Please insert a hyperlink to the third level page (noted below) titled "Analytics Partners."]
- **Site Visit Information:** MindWire also collects certain types of non-personal information whenever you visit our website. This information helps MindWire operate our website, assist you, and improve our communications with you. By "Site Visit Information" we mean information that does not identify you personally, such as IP address, device information, and browser information.

## **WHAT DOES MINDWIRE DO WITH THE INFORMATION IT COLLECTS?**

MindWire collects information from you to respond to your requests to learn more information about our company and our services, to alert you of new and exciting developments, and to improve the quality and functioning of our website. MindWire does not sell or lease your information with third-parties. You should read this section carefully to learn more about what we do with the information you share with us.

- MindWire's use of your Personal, Analytics, and Site Visit Information: We may use the collected personal information to respond to your inquiries, provide customer support, and send important updates about our services or changes to our policies. With your consent, we may use your contact information to send you promotional materials, newsletters, and marketing communications related to our products and services. Analyzing usage data and feedback to enhance our website's functionality, content, and user experience. MindWire does not share Personal, Analytics, and Site Visit Information with Service Providers.
- Legal and law enforcement requests: MindWire may also disclose, at its sole discretion, your Personal or Site Visit Information as required by law, or to comply with a legally binding request—like a subpoena, warrant, or similar legally enforceable request for information. We may also process Personal or Site Visit Information if necessary in the defense of a legal claim. We will not delete such information if relevant to an investigation or dispute. It will continue to be stored until those issues are fully resolved.

## **DOES MINDWIRE USE COOKIES?**

"Cookies" are electronic files many websites place on a visitor's computer to store information that makes each visit to a respective site more efficient. MindWire uses both "session" and "persistent" cookies on its website. A session cookie stores information about you only while you are visiting our site, and is then deleted when you leave our site. Persistent cookies store information about you, your preferences, and information about other websites you visit, and it remains on your computer or device after you leave our website. To remove cookies, you may configure your browser to clear all cookies, or configure it to reject cookies whenever you visit a new website. Please consult your browser's user guide for specific instructions on removing cookies.

As we discussed above, MindWire works with our Analytics Partners to improve the quality of our website, and to give you access to more relevant information. Our Analytics Partners may use session and persistent cookies, tracking beacons or other monitoring technologies.

## **DOES MINDWIRE TRACK MY ACTIVITY ACROSS OTHER WEBSITES?**

When you visit our website, we automatically collect the name of the website you visited from (called the "referring page") and the name of the website you chose to visit immediately after ours (called the "exit page"), and information about other websites you have recently visited. This information is used to improve our website, but we cannot identify you from any information we receive from cookies (see "Does MindWire Use Cookies?" MindWire does not honor the "Do Not Track" settings available on most browsers. When MindWire's website detects the Do Not Track signal from your browser, it will still collect referring and exit page information and other information when you visit our website.

## **CAN I CHOOSE TO STOP RECEIVING MARKETING MESSAGES FROM MINDWIRE?**

MindWire may send you newsletters and other messages, including marketing emails, about exciting developments with our business, and to alert you to relevant advertisements and other opportunities. We will only send you communications if you give us express permission to do so by completing a form on our website or attend a training with MindWire. You can always choose to stop receiving newsletters or other communications from us by clicking the “unsubscribe” link at the bottom of a MindWire marketing message.

## **CAN CHILDREN USE MINDWIRE’S WEBSITE?**

Our website is not directed at children under 13, and we do not knowingly collect personal or other information from children under 13. Simply put, MindWire does not permit children users under the age of 13 to use our website. If you are the parent of a child under the age of 13, and you believe he or she has shared information with MindWire, please contact us at [Support@MindWire.com](mailto:Support@MindWire.com) so we can remove their information from our systems.

## **WHAT IF I LIVE OUTSIDE THE UNITED STATES?**

MindWire is based in the United States, and our website is hosted there. If you are visiting our website from another country, the laws governing our website’s collection and use of personal information may be different from the laws of your country. If you decide to visit our website or share your personal information with MindWire, you are agreeing to be governed by the laws of the United States, and you are expressly consenting to the transfer of your data to the United States.

## **WHAT IF I FOLLOW A LINK TO A THIRD-PARTY WEBSITE?**

MindWire’s website may contain links to third-party websites. Those websites are governed by their own privacy and data use practices and policies. MindWire does not have control over the privacy practices of the advertisers or other third-parties operating these websites, and we have no control over how these third parties collect or use the information you chose to share with them.

## **HOW DOES MINDWIRE PROTECT MY INFORMATION?**

MindWire takes the security of your personal information very seriously. MindWire uses reasonable administrative, physical, and technical safeguards to secure the personal information you share with us. Despite these safeguards and our additional efforts to secure your information, MindWire cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third-parties will not be able to defeat our security, and improperly collect, access, steal, or modify your personal information.

## **WHAT IS MY RIGHT OF ACCESS TO PERSONAL DATA?**

An individual has the right to obtain from the controller, confirmation as to whether personal data concerning them is being processed. We are committed to upholding the rights of individuals and have dedicated processes in place for providing access to personal information. Where requested, we will provide the following information:

- the purposes of the processing
- the categories of personal data

- the recipient(s) or categories of recipient(s) to whom the personal data have been or will be disclosed
- If the data has been transferred to a third country or international organization(s) (and if applicable, the appropriate safeguards used)
- the envisaged period for which the personal data will be stored, or the criteria used to determine that period
- where the personal data was not collected directly from the individual, any available information as to its source

### **WHAT IS MY RIGHT TO ARBITRATION?**

Under certain conditions, an individual may have the right to invoke binding arbitration for certain complaints regarding Privacy Shield compliance not resolved by any other Privacy Shield mechanisms. For additional information, please visit:

<https://www.privacyshield.gov/article?id=ANNEX-I-introduction>

### **WHAT ARE MY CHOICES TO RESTRICT PROCESSING?**

In certain circumstances, you may also have the right to request from the Company to restrict the processing of personal data where it concerns your personal information. You can use the contact details in the "Contact" section below to make such requests.

### **WILL MINDWIRE CHANGE THIS PRIVACY POLICY?**

MindWire may update our privacy policy to reflect changes to our website and our information practices. If we make any material changes, we will notify you by posting a notice on our website with a link to our revised policy, and we may contact you if you have supplied us with a valid e-mail address. We encourage you to periodically visit this page for the latest information on our privacy practices.

### **HOW DO I CONTACT MINDWIRE?**

For questions about this privacy policy or about MindWire's privacy and information security practices generally, you can contact MindWire at Support@[MindWire.com](mailto:Support@MindWire.com) or at 11201 N Tatum Blvd, Suite 160, Phoenix, AZ 85028.