



www.osganalytics.com

Optimal Strategic Group, Inc. – Privacy Policy

This Privacy Policy has been compiled to better serve those who are concerned with how their 'Personally Identifiable Information' (PII) is being used online. PII, as described in relevant privacy laws and information security, is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context. Please read our privacy policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your PII in accordance with our website.

Our Privacy Policy has been prepared to comply with the laws of every jurisdiction in which we aim to do business including those in the UK as well as the EU General Data Protection Regulation (GDPR). If you think it fails to satisfy the law of your country, please let us know but ultimately, it is your choice as to whether you wish to use our website and/or services knowing how we process your data as per this Privacy Policy.

We will only use your data when the laws allow us.

We adhere to the following GDPR Principles when processing personal data:

- Data is processed fairly and lawfully;
- Data is processed only for specified and lawful purposes;
- Processed data is adequate, relevant and not excessive;
- Processed data is accurate and, where necessary, kept up to date;
- Data is not kept longer than necessary; and
- Data is kept secure and is processed in a manner that ensures appropriate security

We are the controller and responsible for your data.

What personal information do we collect from the people that visit our blog, website, or app?

When registering on our site, as appropriate, you may be asked to enter your name, email address, mailing address, phone number or other details to help you with your experience.

When do we collect information?

We collect information from you when you register on our site, subscribe to a newsletter, respond to a survey, fill out a form, Use Live Chat or enter information on our site.

How do we use your information?

We may use the information we collect from you when you register, sign up for our newsletter, respond to a survey or marketing communication, surf the website, or use certain other site features in the following ways:

- To personalize your experience and to allow us to deliver the type of content and product offerings in which you are most interested.
- To improve our website in order to better serve you.
- To allow us to better service you in responding to your customer service requests.
- To administer a contest, promotion, survey or other site feature.
- To ask for ratings and reviews of services or products

How do we store your data?

Your data will be stored on our CRM systems to enable us to carry out the necessary steps to provide you with the service/information for which you enquired about. This data will be willingly provided to us by yourself. In some cases, we may get your information from a third party or partner company. This information would only be shared with us should you have provided the third party or partner company with prior consent to do so.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Do we share your data?

- We will not sell or rent your data to third parties
- We may share your data with third parties to fulfill a contract you have in place with us
- We may pass your data onto our third-party service providers, subcontractors and other associated organizations for the purposes of carrying out a task in accordance to the contract we have in place with you. However, when we share your data with third parties, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your data secure and only for the duration it is required to carry out that specific task
- Third party product providers we work in association with: We work closely with various third-party product providers to bring you a range of quality and reliable products and services designed to meet your needs. When you enquire about or purchase one or more of these products, the relevant third-party product provider will use your details to provide you with information and carry out their obligations arising from any contracts you have entered into with them. In some cases, they will be acting as a data controller of your data and therefore we advise you to read their privacy notice

- We may also further transfer data if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or to law enforcement. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

How do we protect your information?

- We do not use vulnerability scanning and/or scanning to PCI standards
- We only provide articles and information. We never ask for credit card numbers
- We use regular Malware Scanning

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential. In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology.

We implement a variety of security measures when a user enters, submits, or accesses their information to maintain the safety of your personal information.

Do we use 'cookies'?

Yes. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information. They are also used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

We use cookies to:

- Understand and save user's preferences for future visits
- Keep track of advertisements
- Compile aggregate data about site traffic and site interactions in order to offer better site experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Since each browser is a little different, look at your browser's Help Menu to learn the correct way to modify your cookies.

If you turn cookies off, some of the features that make your site experience more efficient may not function properly. It won't affect the user's experience that make your site experience more efficient and may not function properly.

Third-party disclosure

We do not sell, trade, or otherwise transfer to outside parties your Personally Identifiable Information unless we provide users with advance notice. This does not include website hosting partners and other parties who assist us in operating our website, conducting our business, or serving our users, so long as those parties agree to keep this information confidential. We may also release information when it's release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property or safety.

However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

Downloads & Media Files

Any downloadable documents, files or media made available on this website are provided to users at their own risk. While all precautions have been undertaken to ensure only genuine downloads are available users are advised to verify their authenticity using third party antivirus software or similar applications. We accept no responsibility for third party downloads and downloads provided by external third-party websites and advise users to verify their authenticity using third party antivirus software or similar applications.

Contact & Communication with us

Users contacting us through this website do so at their own discretion and provide any such personal details requested at their own risk. Your personal information is kept private and stored securely until a time it is no longer required or has no use.

Where we have clearly stated and made you aware of the fact, and where you have given your express permission, we may use your details to send you products/services information through a mailing list system.

Email Mailing List & Marketing Messages

We operate an email mailing list program, used to inform subscribers about products, services and/or news we supply/publish. Users can subscribe through an online automated process where they have given their explicit permission. Subscriber personal details are collected, processed, managed and stored in accordance with the regulations stated herein. Subscribers can unsubscribe at any time through an automated online service, or if not available, other means as detailed in the footer of sent marketing messages. The type and content of marketing messages subscribers receive, and if it may contain third party content, is clearly outlined at the point of subscription.

Email marketing messages may contain tracking beacons/tracked clickable links or similar server technologies in order to track subscriber activity within email marketing messages. Where used, such marketing messages may record a range of subscriber data relating to engagement, geographic, demographics and already stored subscriber data.

External Website Links & Third Parties

Although we only include quality, safe and relevant external links, users are advised to adopt a policy of caution before clicking any external web links mentioned throughout this website, if any.

We cannot guarantee or verify the contents of any externally linked website despite our best efforts. Users should therefore note they click on external links at their own risk and we cannot be held liable for any damages or implications caused by visiting any external links mentioned.

We do not include or offer third-party products or services on our website.

Social Media

There may be instances where our website features social sharing buttons, which help share web content directly from web pages to the respective social media platforms. You use social sharing buttons at your own discretion and accept that doing so may publish content to your social media profile feed or page. You can find further information about some social media privacy and usage policies in the resources section below.

Google

Google's advertising requirements can be summed up by Google's Advertising Principles. They are put in place to provide a positive experience for users. <https://support.google.com/adwordspolicy/answer/1316548?hl=en>

We have not enabled Google AdSense on our site but we may do so in the future.

California Online Privacy Protection Act (CalOPPA)

CalOPPA is the first state law in the nation to require commercial websites and online services to post a privacy policy. The law's reach stretches well beyond California to require any person or company in the United States (and conceivably the world) that operates websites collecting Personally Identifiable Information from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals or companies with whom it is being shared. See more at: <http://consumercal.org/california-online-privacy-protection-act-caloppa/#sthash.0FdRbT5I.dpuf>

According to CalOPPA, we agree to the following:

- Users can visit our site anonymously
- Once this privacy policy is created, we will add a link to it on our home page or as a minimum, on the first significant page after entering our website
- Our Privacy Policy link includes the word 'Privacy' and can easily be found on the page specified above

You will be notified of any Privacy Policy changes:

- On our Privacy Policy Page

You can change your personal information:

- By emailing us

How does our site handle Do Not Track signals?

We honor Do Not Track signals and Do Not Track, plant cookies, or use advertising when a Do Not Track (DNT) browser mechanism is in place.

Does our site allow third-party behavioral tracking?

It's also important to note that we do not allow third-party behavioral tracking

COPPA (Children Online Privacy Protection Act)

When it comes to the collection of personal information from children under the age of 13 years old, the Children's Online Privacy Protection Act (COPPA) puts parents in control. The Federal Trade Commission, United States' consumer protection agency, enforces the COPPA Rule, which spells out what operators of websites and online services must do to protect children's privacy and safety online.

Our services are not intended for use by children or any person below the age of 16 years and we do not knowingly collect data relating from children.

Fair Information Practices

The Fair Information Practices Principles form the backbone of privacy law in the United States and the concepts they include have played a significant role in the development of data protection laws around the globe. Understanding the Fair Information Practice Principles and how they should be implemented is critical to comply with the various privacy laws that protect personal information.

In order to be in line with Fair Information Practices we will take the following responsive action, should a data breach occur:

- We will notify you via email and in accordance with local law requirements
- We also agree to the Individual Redress Principle which requires that individuals have the right to legally pursue enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users, but also that individuals have recourse to courts or government agencies to investigate and/or prosecute non-compliance by data processors

CAN SPAM Act

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

We collect your email address in order to:

- Send information, respond to inquiries, and/or other requests or questions
- Market to our mailing list or continue to send emails to our clients after the original transaction has occurred

To be in accordance with CANSPAM, we agree to the following:

- Not use false or misleading subjects or email addresses
- Identify the message as an advertisement in some reasonable way
- Include the physical address of our business or site headquarters
- Monitor third-party email marketing services for compliance, if one is used
- Honor opt-out/unsubscribe requests quickly
- Allow users to unsubscribe by using the link at the bottom of each email

What are your rights as a data subject?

We understand how important your data and the processing of it is to you. We therefore adhere to the rights of the data subject within the various grounds of Lawful Processing (as defined in the General Data Protection Regulation). These rights include:

- The right to be informed how personal data is processed
- The right of access to your personal data: You may request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it
- **The right to rectification:** You have the right to request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us
- **The right to erasure:** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or re-move your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request
- **The right to object to processing:** You may object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms
- **The right to restrict processing:** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it
- **The right to data portability:** You may request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Rights in relation to automated decision making and profiling:** Under the GDPR, you also have a right not to be subject to decisions based solely on automated data processing (including profiling) if the decision produces legal effects on you or significantly affects you
- **You have the right to withdraw consent at any time where we are relying on consent to process your personal data.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent

Should you wish to exercise any of these rights, please do so by contacting us at the details stated below. To better safeguard your data, we will also take reasonable steps to verify your identity before granting access or making corrections to your data. Please note that calls may be recorded for training purposes and of protection of our staff and clients.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

If at any time you would like to unsubscribe from receiving future emails, you can email us at: support@osganalytics.com and we will promptly remove you from ALL correspondence.

Data Privacy Officer (DPO)

The designated Data Privacy Officer for Optimal Strategix Group is Carl Aloï, who can be contacted at carl.aloi@osganalytics.com.

Contacting Us

If there are any questions regarding this privacy policy, you may contact us using the information below.

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support@osganalytics.com

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