

# **OUR PRIVACY POLICY**

North Star Consulting Group, Inc is committed to protecting and respecting your privacy and to complying with data protection legislation. This privacy policy aims to provide transparency for our users & survey participants giving insight as to who we are, what our business activities are, and how we process the limited amount of personal data that we use/store.

## 1) WHO WE ARE ... AND HOW TO CONTACT US

North Star Consulting Group Inc. (North Star) provides services related to employee and customer feedback software to companies who want to monitor the "pulse" of their two most important stakeholders, their employees and their clients. Our business address is:

North Star Consulting Group, Inc. 5W Mendenhall, Suite 202 Bozeman, MT 59715 USA

Our primary contact for any privacy policy questions or concerns:

Doug Hammell <u>dhammell@northstarconsulting.net</u>

## 2) LEGAL BASIS FOR & PURPOSE OF PROCESSING PERSONAL INFORMATION

At the request of our clients, North Star provides services related to the collection of employee and client feedback. As per standard industry best practice...Our EMPLOYEE feedback surveys are always ANONYMOUS. We do not track IP addresses, names, emails, etc. Final deliverables & reporting related to employee feedback is always aggregated (Average Scores, etc) and individual data/responses that could be personally identifiable are NEVER provided back to the company.

In CLIENT feedback projects customer names & emails necessarily are provided so that North Star may contact & request client feedback ratings & comments. In these projects, unless specifically stated otherwise, it is common practice to report client feedback back to our client for the purposes of immediately rectifying potential issues, further follow-up or generally strengthening these relationships.

In all the work done by North Star, users always have the choice whether to participate in our surveys or not. The basis for processing personal information is the company's legitimate interest and/or a customer relationship or the execution of an agreement.

### 3) THE KINDS OF INFORMATION WE PROCESS?

We do not process or store any <u>sensitive</u> personal data of our customers, prospects, suppliers, partners or website visitors.

In connection with our website: <u>www.northstarconsulting.net</u> we may process customer information such as:

- basic information on the registered person, such as name, customer number, user name and/or other unique identifier, password, service language.
- contact information of a person, such as e-mail address, telephone number, address information,
- information on companies and their contact persons,
- possible refusal of, or consent to, direct marketing
- possible other information collected specifically with the consent of the person.
- information on website visitors may be collected with cookies and other similar techniques (e.g. language selection, address from which the visitor arrives, pages loaded, browser type, operating system, date and time, IP address) bans on and consents to direct marketing and other possible information given by the customers themselves. In most cases this is statistical data about browsing actions that does not identify any individual.

The data content from the use of the various survey tools used by North Star does not generally consist of any personally identifiable information for EMPLOYEE survey projects, as they are ANONYMOUS.

CLIENT feedback projects may involve processing basic personal information such as: user accounts of the tool, information on customers and their contact persons and information on the use of the service.

- name, title, company, postal address, e-mail address, telephone number

- customer history (e.g. customer feedback)

- information on service use by identified customers (e.g. timestamp and IP address of most recent login, number of queries and query elements, statistical information related to use).

We cannot deliver products and/or services without the required personal information.

## 4) WHERE DO WE OBTAIN INFORMATION?

As a rule, the information is collected from the participants/users themselves or by way of our contracted client providing it for use in survey project.

# 5) WHO DO WE TRANSFER OR DISCLOSE INFORMATION TO?

<u>We do not sell any personally identifiable information.</u> We do not disclose personally identifiable information to outside parties. In the processing of personal information, we do make use of subcontractors working for us. We have outsourced IT management and certain software technology from outside service providers, and personal information is saved on servers administered and protected by these. We have taken steps to protect your privacy by preparing a data processing agreement on the processing of personal information by our vendors.

### 6) HOW DO WE PROTECT THE INFORMATION AND HOW LONG DO WE KEEP IT?

Only those of our employees who have the right to handle customer information as part of their job are entitled to use the system containing personal information. The information is collected in databases protected by firewalls, passwords, encryption, and other technical means. The databases and their backup copies are also secured in similar fashion.

We only keep your personal information as long as is necessary. Personal information is erased from our systems when a person whose information it is asks for it to be erased. After customer information is erased, the information can no longer be restored.

### 7) WHAT ARE YOUR RIGHTS?

ALL potential participants always have the right to choose not to participate in one of our surveys. Users may also choose to unsubscribe from future survey participation requests by using the links provided at the bottom of our survey invitation emails.

In cases where we are able to identify your record (non-anonymous survey projects) You have the right to check the information saved on you in our systems and demand that inaccurate information be erased or rectified. You also have the right to cancel or change your consent.

As of May 25<sup>th</sup>, 2018 persons in the EU have the right to oppose the processing of your information or ask the processing to be limited, and the right to lodge a complaint on the processing of personal information to the supervisory authority.

For special personal reasons, you also have the right to oppose profiling and other processing of your personal information when the basis for the processing is our legitimate interest. When making your demand, you must specify the situation based on which you oppose processing. We can only refuse to carry out a request concerning opposition on grounds given in law.

You also have the right to oppose processing at any time and free of charge, including profiling related to direct marketing.

### 8) WHO CAN YOU CONTACT?

All contact and requests concerning this privacy statement shall be made in writing to the contact person named in section 1.

### 9) CHANGES TO THE PRIVACY STATEMENT

We keep our privacy policy under regular review. Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. This privacy policy was last updated on May 25, 2018.