

# **Trexin Privacy Notice**

**LAST UPDATED: FEBRUARY 2018**

At Trexin, we value the privacy of our users. Accordingly, this Privacy Notice aims to clarify how we collect, maintain, and use your personal information on <https://www.trexin.com> (the “Site”). This Privacy Notice explains our online information practices and your choices about how we collect and use your information on the Site.

This Privacy Notice is subject to periodic changes and updates. These changes are effective upon posting to the Site. Please check this Privacy Notice periodically for updates. Your continued use of the Site constitutes your acceptance of the terms of this Privacy Notice, as amended from time to time.

This Privacy Notice applies only to the information we collect on <https://www.trexin.com>. In cases where the Site directs you to the website of any third party, including sites like Twitter, or LinkedIn, this Privacy Notice does not govern the privacy practices of such third parties. You should refer to their respective privacy policies for details on their use of your information.

## **About Trexin**

Founded on the principles of trust, experience, and innovation, Trexin Consulting specializes in strategy execution – the implementation of business strategy to achieve targeted business goals. Applied strategy situations that Trexin frequently leads include: scaling capabilities for growth, optimizing operations for cost reduction, driving synergies for M&A, and recovering projects in distress. Trexin’s services are right-sized for our Clients’ needs, ranging from our “Diamond Team” service when our Clients want Trexin to own an outcome and share delivery risk, to Expert/Advisory services for senior-level guidance, to Strategic Staffing services for execution-oriented tasks and roles. Our expertise spans Healthcare, Life Sciences, Financial Services, and Products & Distribution, overlaid by multidisciplinary skills in the five capabilities essential to executing strategy: Aligned Enterprise, Program Execution, Technology, Innovation, and Analytics.

## **The Information We Collect and How We Use It**

We may collect two kinds of information via the Site. They are:

- Personally Identifiable Information

Personally Identifiable Information (“PII”) is information that identifies you or is closely associated with your identity. PII includes information such as your name, email address, address, phone number or any other data that may be used to identify, contact, or connect with you.

We may collect PII when you provide such information on our site when you use the “Contact us” function on our Site. Your provision of PII to us is completely voluntary on your part—we receive PII through the Site only to respond to your inquiries. **Please do not provide us with any sensitive**

**PII** such as social security numbers, credit card numbers, passport numbers, biometric data, or other sensitive information.

We own the PII collected on this site. If you provide us with your mailing address and/or email address, we may periodically send you information, news, announcements or other marketing communications about Trexin. You may unsubscribe from any of our communications at any time. Otherwise, we will only use your PII collected for the purpose for which you submitted it (e.g., to respond to you regarding the reason you contacted us) or to tell you about important news related to our Site or Privacy Notice. We do not sell, trade, or rent your PII to or with others unless required by law, by contract, or in the event Trexin ceases to exist as an entity (e.g., through acquisition or merger). In no circumstance will we provide your PII to third parties for marketing purposes.

Where we disclose your PII to third parties, such as those that perform services on our behalf, we will require those organizations to use such PII solely for the purpose of providing services to us or you, and we will require that they protect your PII with appropriate safeguards.

- Non-Personal Data

As you interact with the Site, we may also collect information that is not PII (“Non-Personal Data”). We use Non-Personal Data for purposes such as optimizing the performance of the Site, gauging the Site’s popularity, and collecting information about your Internet Service Provider, browser type, domain name, website that referred you to the Site, webpages that you access on the Site, date and time of your visits to the Site, and your IP address. We collect Non-Personal Data to improve your access to the Site and the Site’s functionality. Non-Personal Data may also be used to establish trends in activity on the Site, monitor the Site’s performance, improve the Site’s design, provide services, inform third parties about our services, and for other business purposes.

“Cookies” are a type of Non-Personal Data. They are pieces of code/text that some websites transfer to the computer that is browsing that websites, and are used for record-keeping purposes. Use of cookies allows us to provide you with certain conveniences when using the Site, such as delivering content specific to your interests, or pre-populating user information to save you from having to re-enter your data at each connection when using features like online payment. We also may use cookies to track the path of users through the Site, and to keep track of how they arrived at the Site (for example, via a search engine). Most web browsers allow you to configure your browser’s preferences to prevent your browser from accepting new cookies, notify you when you receive a new cookie, or disable cookies altogether. If you would prefer not to receive cookies, you may alter the configuration of your browser to refuse cookies. If you choose to have your browser refuse cookies, it is possible that some areas of the Site will not function properly when you view them.

### **How We Protect Your PII; Security**

Your privacy is important to us, and we use commercially reasonable efforts and reasonably available technologies to preserve the security of your PII and protect it from unauthorized use or disclosure. You understand, however that no system is perfect, and we cannot ensure or warrant the security of any or all of the PII that you transmit through the Site.

We combine technical and physical safeguards with policies and procedures to help protect your information. When you submit PII via our Site, your PII is encrypted and transmitted to us in a secure way. We also protect your PII offline. The computers and servers on which we store your PII are kept in a secure environment.

Our employees, contractors, and service providers ("agents") must have a legitimate business reason (i.e., related to furthering our mission or related to achieving the purpose for which you have provided your PII) to access the PII you provide.

### **Business Transfers**

As we continue to develop our business, we may buy or sell some of our business units. In these transactions, your PII may be transferred, but it shall remain subject to the promises made in this Privacy Notice, unless you consent otherwise. In the event Trexin sells or transfers substantially all of its assets, or in the event of a change in control, merger, consolidation, or organizational restructuring, you hereby authorize us to transfer your PII subject to the terms of this Privacy Notice, as it is amended from time to time.

### **When We Must Share or Disclose Your PII**

We may be obligated to disclose your PII in certain circumstances, including but not limited to:

1. When we are required by law, a court or administrative agency order, other government entity, or court rules regarding production of records;
2. When we have reasonable grounds to believe that use or disclosure is necessary to protect the rights, privacy, property, or safety of any other person or organization;
3. When we have reasonable grounds to believe that the information relates to a breach of agreement or online policy, or violation of law has been, is being, or is about to be committed;
4. When it is necessary for fraud protection, risk reduction, or the establishment or collection of funds owed to us;
5. When it is necessary to enforce or apply our Terms of Use and other agreements, to pursue remedies, or to limit damages to Trexin;
6. If the information is reasonably determined by us to be non-personally identifying information or is otherwise public; or
7. For other reasons not restricted or otherwise required by laws, rules, regulation, or order.

When we are required to disclose PII, we are still committed to not disclosing more information than is necessary to fulfill the purpose of such disclosure.

### **How We Protect Children's Privacy**

We do not knowingly collect or solicit information from anyone under the age of 13.

In the event that we learn that we have collected personal information from a child under the age of 13 without parental consent, we will delete that information as soon as practicable from our server. If you believe that we might have any information collected from a child under the age of 13, please contact us.

## **Your California Privacy Rights/Do Not Track Disclosures**

California Civil Code Section 1798.83 permits California residents to request certain information regarding our disclosures of your personal information to third parties for their direct marketing purposes. To make such a request, please contact us.

Some web browsers may transmit “do-not-track” signals to the websites with which you are communicating. Because of differences in how web browsers incorporate and activate this feature, it is not always clear whether you intend for these signals to be transmitted, or whether you even are aware of them. Because there currently is no industry standard concerning what, if anything, websites should do when they receive such signals, we currently do not take action in response to these signals.

## **We Are an American Organization, so We Follow U.S. Law**

Please note that the services we offer on Site are directed towards users who live in the United States. By using the Site, you consent to the collection, storage, processing, and transfer of your information in and to the United States, or other countries and territories, pursuant to the laws of the United States, and the State of Minnesota.

## **Your Consent, How You Can Access and Adjust Your Information, and Retention**

If you do not consent to our collection, use, or disclosure of your personal information, then do not share it with us. However, we may be unable to offer some services without your PII. You may withdraw your consent at any time, subject to reasonable notice and legal or contractual obligations. To withdraw your consent, simply notify us in writing of the information that you no longer wish for us to maintain (subject to aforementioned legal or contractual obligations).

We keep your PII only as long as we need it for the purpose for which we collected it. We continue to hold this information for a reasonable amount of time or as long as required by applicable laws, rules, or regulations. When we no longer require your personal information, we have procedures in place to destroy, delete, or erase it, or, at our election, convert it into an anonymous form. We use commercially reasonable efforts and reasonably available technologies to ensure that such destruction, deletion, erasure, or conversion is done securely or otherwise complies with applicable law.

## **How to Contact Trexin**

We are always happy to hear from you with your questions or comments. For additional information, or if you have any questions regarding this Privacy Notice, or our privacy practices in general, please send your questions or comments to us at [confidentiality@trexin.com](mailto:confidentiality@trexin.com).

Please provide details in your correspondence to enable us to respond and take appropriate action. It may take up to thirty (30) days to see changes or results.