

Privacy Policy

INTRODUCTION- Fata & Fleishman Mentorship (“we,” “us,” or “our”) understands the need for transparency when it comes to the information we collect from visitors to and users of our website at <https://www.fatafleishman.org> (together with the mobile version of such site, and any related applications, the “Website”). Accordingly, we have developed this Privacy Policy (this “policy”) to describe the types of information that we may collect from you, and our practices for collecting, using, maintaining, protecting and disclosing that information.

Please read this policy carefully to understand how we treat the information we collect. If you do not agree with this policy, your choice is to cease immediately your use of our Website. By accessing or using this Website, you agree to this policy. We may update this policy from time to time. Your continued use of this Website after we post any changes constitutes your acceptance of those changes, so please check the policy periodically for updates.

INFORMATION WE COLLECT ABOUT YOU AND HOW WE COLLECT IT- We collect personal data that you voluntarily provide to us, such as name, e-mail address, telephone number, and any other information that could be used to personally identify you (collectively, “personal data”). You may voluntarily provide personal data when you fill in forms on our Website, reach out to us directly by sending us correspondence, or use the Website to view and download contents.

The Website and its servers may also collect other information from you, such as your technical information including information regarding your internet connection, the hardware and software you use to access our Website, your IP address, page views, clicks, and other such information that does not personally identify you (collectively, “technical data”).

USER DATA- Fata & Fleishman Mentorship may use technical data for various purposes as described in this policy, as further specified in this “User Data” section of this policy. Fata & Fleishman Mentorship will not share User data with a third party. We use at least industry standard security policies and measures to help prevent any unauthorized access to User data.

We process, use, and share User data as instructed or permitted by the applicable User. We may transmit User data over international borders as necessary for providing our services in accordance with our standard business practices and this policy, but we will maintain reasonable security policies regardless of where User data is stored or processed.

We will share any User data with the User and any third parties as instructed or permitted by the User. We may also share User data with other third party data processors who facilitate our provision of the services requested by the User and who are prohibited from using User data except for such purpose. We may also be required to share User data with applicable government entities or as otherwise required by law.

AUTOMATIC DATA COLLECTION- We may use cookies, web beacons, pixels, and similar technologies to automatically collect certain information about your online activities over time. The technologies we use for this automatic data collection may include:

- Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- Flash Cookies. Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies.
- Web Beacons. Pages of our the Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email and for other related Website statistics (for example, recording the popularity of certain Website content and verifying system and server integrity).

We use information collected by the technologies described above, to help us improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website to your specific business needs.
- Speed up your searches.

- Recognize you when you return to our Website.

Some content or applications on the Website are served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Website. The information they collect may be associated with your personal data or they may collect information, including personal data, about your online activities over time and across different websites and other online services. For information about how you can opt out of receiving targeted advertising from many providers, see [Your Data Collection Choices](#).

HOW WE USE YOUR INFORMATION- We may use personal data:

- To fulfill the purpose for which you provide it (for example to provide products, services, support, or information you request, to review your job application through our Careers page, or to respond to your correspondence or other requests);
- to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection;
- to contact you regarding any transactions you've entered into with us;
- to notify you about changes to our Website or any products or services we offer or provide through it; or
- in any other way we may describe when you provide the information, or for which you provide consent.

We may also use your information to market, advertise, promote or otherwise contact you about our products and services. If you do not want us to use your information in this way, see [Your Data Collection Choices](#) for instructions on how to opt out of these communications. We may use technical data, which does not identify you personally, in any way we deem appropriate.

DISCLOSURE OF YOUR INFORMATION- We may disclose personal data:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request, to enforce or apply our website policies and other agreements, for billing and collection purposes, or if we believe disclosure is

necessary or appropriate to protect our rights, property, or safety or that of others. This includes exchanging information with other companies and organizations for the purposes of fraud protection.

CHILDREN UNDER THE AGE OF 13- Our Website is not intended for children under 13 years of age. We do not knowingly collect personal data from children under 13. If you are under 13, do not use or provide any information on this Website or on or through any of its features/register on the Website or provide any information about yourself to us, including your name, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal data from a child under 13, we will promptly take commercially reasonable steps to delete that information. If you believe we might have any information from or about a child under 13, please contact us at toolbox@fatafleishman.org.

YOUR CALIFORNIA PRIVACY RIGHTS- Our supplemental Privacy Notice for California Residents is available in the addendum.

EUROPEAN, UNITED KINGDOM AND SWISS DATA- This section applies only to personal data relating to European, United Kingdom and Swiss data subjects. Fata & Fleishman Mentorship Software, Inc. and our subsidiary Fata & Fleishman Mentorship Payroll, LLC comply with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Frameworks, as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union, the United Kingdom and Switzerland to the United States. Fata & Fleishman Mentorship has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

In compliance with the Privacy Shield Principles, Fata & Fleishman Mentorship commits to resolve complaints about our collection or use of your personal information. European Union, United Kingdom and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact Fata & Fleishman Mentorship at toolbox@fatafleishman.org.

Additionally, Fata & Fleishman Mentorship commits to cooperate with the panel established by the EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner and comply with the advice given by the panel and Commissioner with regard to human resources data and other data transferred from EU, UK or Switzerland, as applicable.

Under certain circumstances, European Union, United Kingdom and Swiss individuals may invoke binding arbitration for complaints regarding Fata & Fleishman Mentorship's Privacy Shield compliance not resolved by any of the other Privacy Shield mechanisms described above. For additional information, please visit <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>.

The Federal Trade Commission has jurisdiction over Fata & Fleishman Mentorship's Compliance with Privacy Shield.

If an agent of Fata & Fleishman Mentorship processes personal information in a manner inconsistent with the Privacy Shield Principles, Fata & Fleishman Mentorship will remain liable for such processing unless we prove that we are not responsible for the event giving rise to the damage.

DATA SECURITY- We have implemented at least industry standard measures designed to secure your personal data from accidental loss and from unauthorized access, use, alteration, and disclosure. The safety and security of your information also depends on you. You are responsible for keeping your username, password, and any other login credentials or user verification information confidential. You may not share this information with anyone. Unfortunately, the transmission of information via the internet is not completely secure, so we cannot guarantee the security of your personal data transmitted to our Website. Any transmission of personal data is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

In order to protect you and your data and that of our other users, we may suspend your access to the Website without notice, pending an investigation, if any breach of security is suspected.

CHANGES TO OUR PRIVACY POLICY- For any changes we make to this policy, including making material changes to how we treat our users' personal data, we will post an updated policy on this page, along with a notice that the privacy policy has been updated on the Website home page. The date the privacy policy was last revised is identified at the top of the page. Please be aware, you are responsible for inspecting our website to make yourself up-to-date with our privacy policy.

CONTACT INFORMATION- To make a request regarding your personal data, please contact toolbox@fatafleishman.org. You may also ask questions or provide comments about this privacy policy and our privacy practices by emailing toolbox@fatafleishman.org.

ADDENDUM

Privacy Notice for California Residents

Last Revised: June 01, 2021

This Privacy Notice for California Residents supplements the information contained in Fata & Fleishman's general Privacy Policy and applies solely to all website visitors and users who reside in the State of California. We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this notice.

Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular user or device ("**personal information**"). Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.

In particular, we have collected through our website the following categories of personal information from users within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, unique personal identifier, online identifier, Internet Protocol address, email address, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A 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 any other financial information, medical information, or health insurance information.	NO

	Some personal information included in this category may overlap with other categories.	
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	NO
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	NO
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO

K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO
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We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or products and services you utilize.

Use of Personal Information

We do not sell your personal information. We may use, or disclose the personal information we collect for business purposes, including:

- Detecting security incidents and preventing fraud
- Debugging
- Performing our services
- Advertising and marketing our services
- Performing analytics and quality control
- Researching and testing to improve our services

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

Disclosures of Personal Information for a Business Purpose

In the preceding twelve (12) months, Fata & Fleishman has disclosed the following categories of personal information for a business purpose:

- Category A: Identifiers.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months, subject to certain exceptions. Once we receive and confirm your verifiable user request (see Exercising Access, Data Portability, and Deletion Rights), we will disclose to you:

- The categories of personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- Upon request, the specific pieces of personal information we collected about you (also called a data portability request).
- If we disclosed your personal information for a business purpose, a list disclosing:
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and

Deletion Rights), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with user expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us at toolbox@fatafleishman.org.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not do any of the following based on your exercise of CCPA rights:

- Deny you services.
- Charge you different prices or rates for services.
- Provide you a different level or quality of services.

Changes to Our Privacy Notice

For any changes we make to this notice, including making material changes to how we treat our users' personal data, we will post a notice of such changes on our website home page. The date this notice was last revised is identified at the top of the page. Please be aware, you are responsible for inspecting our website to make yourself up-to-date with our privacy policy and this notice.

Contact Information

If you have any questions or comments about this notice, the ways in which Fata & Fleishman Mentorship collects and uses your information as described in this notice, your choices and rights regarding such use, or wish to exercise your rights under California law, please email toolbox@fatafleishman.org.