

# The Clawson Group Web Site Privacy Policy

Date: March 24, 2021

## PRIVACY STATEMENT

The Clawson Group has created this security and privacy statement in order to document and communicate its commitment to doing business with the highest ethical standards and appropriate internal controls.

We respect your privacy. Information you entrust to The Clawson Group will be handled with the greatest care, and The Clawson Group will not use the information in ways to which you have not consented or is not required by law.

## POLICY SCOPE

**Sites Covered by this Policy** - This Privacy Policy applies to all The Clawson Group - owned websites and domains, and our wholly owned subsidiaries.

**Links to Other Sites** - This site contains a number of links to other sites. The Clawson Group is not responsible for the security or privacy practices of these sites, the products or services offered by these sites, or the content appearing at these sites. The Clawson Group does not endorse any of the products or services marketed at these other sites.

## WEB SITE INFORMATION GATHERING

The Clawson Group recognizes the importance of keeping the information we collect about you confidential. We always take great care to protect what you entrust to us. The Clawson Group is committed to protecting the privacy of visitors to our website.

**Personal Information Gathering** - We do not automatically collect personally identifiable information (PII) about our web site visitors. We may record the Internet protocol (IP) address of the computer you are using, the browser software used, the operating systems used, and the websites from which our visitors link directly to our site. We aggregate and use this information to determine how many visitors we have to different pages on our web site, to detect and correct systems problems, and to improve the usability of our web site. This information is not connected to individual names or personal identities.

**Explicit Information Gathering** - You can examine our entire web site without providing any information whatsoever. Our web site's request-for-more-information form requires users to give us contact information. This information is used to provide information to those who inquire about our products and services, to ship orders, to bill orders, and to handle related business matters. This information is also used to get in touch with customers when necessary. From time to time, the information gathered through this site will be used to notify you about products and services that we think will be of interest to you.

**Covert Information Gathering** - Our site does not covertly capture information regarding the specific activities of any particular user. We do not have any arrangements with any other sites to track or monitor user activities on the Web. Our site does, however, produce

reports that permit us to view your activity on our site in anonymous or aggregated form. We do not use cookies, web bugs, or any other active content mechanism to capture or maintain information about users without their prior consent. The only personal information that we capture has been specifically submitted to us through the request-for-more-information form. We do not store any persistent information on your computer.

**Cookies and Web Bugs** - At this time, we do not use cookies on this site. If this changes, this policy statement will be updated to disclose how The Clawson Group uses cookies and for what purpose.

**Personal Information Usage** - When you disclose personal information to us that is where it stays. The only exception involves disclosure to the government according to normal business practice, for instance for the collection of taxes, and according to the orders of a court, for example responding to a subpoena or search warrant. We do not sell, rent, trade, lend, or otherwise transfer such personal information to affiliates, subsidiaries, sister companies, holding companies, parent companies, strategic partners, or any other organization.

## CHILDREN

**Precautions For Children** - The Clawson Group does not attempt to collect personal information from children, and we do not provide services to children. The Clawson Group website is not directed to children under age 18, and we do not knowingly collect personal information from children under age 18. If a child sends personal information to us, and this information can be identified as originating from a child, the information will be deleted. We cannot always determine which information originates with a user that is a child. We do not maintain databases about children.

## EMAIL LIST PRIVACY

**Personal Contacts:** The Clawson Group personnel frequently give presentations at conferences and seminars; write books, articles and newsletters; and participate in similar types of group and individual communications. We often receive business cards as well as requests for additional information or help with risk related issues. When we receive requests for information or help in person, from our web site from information volunteered by our web site visitors, or from conferences from people indicating they want more information about our type of services, we will place these individuals on our contact list.

**Email List Privacy** - With the above exception, The Clawson Group does not sell, rent or share our email lists with any other third parties. We do not link our email lists to any other databases. We do not store emails or individual information on our web server. All personally identifiable information is stored on servers behind our firewall.

## Third Party Access to Your Personal Information

**Third Party Access to Personal Information** – The Clawson Group may use third-parties to process your personal information. In these cases, the information is only used for The Clawson Group business purposes. The Clawson Group contractually prohibits these vendors from using your personal data for any other activities, and from disclosing, selling or leasing them to any other parties.

## WEB SITE SECURITY

**Security Measures** - Our site is protected with a variety of security measures such as change control procedures, passwords, and physical access controls. We also employ a variety of other mechanisms to ensure that data you provide is not lost, misused, or altered inappropriately. These controls include data confidentiality policies and regular database backups.

**Encryption Policy** - Please be aware that the information you send to us in the information request form, privacy information request form, or in an email message will not be encrypted. Do not send any confidential information within clear text forms or email messages. If you want to give us confidential information, please call us at the number given at the bottom of this page.

**Storage of Personally Identifiable Information (PII)** - We do not store any personally identifiable information on our web server.

**Accountability** - Information security personnel ensure the security of the information we process and store.

**Policies and Procedures** – The Clawson Group has internal policies and procedures to limit access to your information to only those who have a business need to view it.

## Sensitive Communicating Via Email and Web Page

**Sending Confidential Information** – Web sites visitors must not use this site to submit confidential information to The Clawson Group. To arrange for the delivery of highly sensitive information, contact The Clawson Group directly by calling 801-281-4884 to communicate any confidential information.

## YOUR PERSONAL INFORMATION

**Access to Personal Information** - We make every effort to keep our records accurate. We will make appropriate changes when you notify us. If you want to view, update or delete the information we have about you in our database, please fill out our privacy information request form. We will follow procedures to verify your identity before providing this information to further protect your privacy.

## Your Opt-In and Opt-Out Decisions

**Product Information** - If you would like to receive information regarding our services or publications, please fill out our information request form.

**Privacy Policies** - If you have a question about our privacy practices, please fill out our privacy information request form.

**Email Lists** - If you are currently on our email list and wish to be removed, please send an email to [kaldrich@theclawsongroup.com](mailto:kaldrich@theclawsongroup.com)

## Privacy Policy Changes

**Policy Change Notice** - We may occasionally make changes to our privacy policy to reflect changes in legal and regulatory requirements, or as necessary as we upgrade or modify our technology, applications and service offerings. We recommend you visit our site to review our privacy policies occasionally.

## CONTACT INFORMATION

**Customer Information Requests** - If you wish to contact us about our products or services, then you need to disclose your contact information so that we can service your request. If you wish to remove your name and related information from our contact database, we will promptly take action to comply with your request. We are pleased to process address error correction notices and address change requests through any of the following channels:

- ◆ Sending regular mail to 292 E. 12200 S., Suite 200, Draper, UT 84020
- ◆ Calling 801-281-4884 during regular business hours MST

**Privacy Policy Questions and Problems:** If you have any specific questions or concerns about our privacy policy or practices, including any suspected potential disclosures of your personal information, please use the following channels:

- ◆ Sending regular mail to 292 E. 12200 S., Suite 200, Draper, UT 84020
- ◆ Calling 801-281-4884 during regular business hours MST

## REFERENCES

This policy helps address the requirements of the following regulations and standards:

OECD Fair Information Principles  
FTC Online Privacy Principles – US Federal Trade Commission  
COPPA – Children’s Online Privacy Protection Act  
ISO 27002: 15.1.4 Data protection and privacy of personal information  
Health Care: HIPAA Privacy - Final Rule, HITECH Act  
Financial Services: GLBA Act, Title V - Privacy