

## **Privacy Policy**

The SwiftLeadership® Café is a Swift HR Solutions, Inc. company. Swift HR Solutions, Inc. (the “Company,” “us,” “we,” or “our”) operates the <https://www.swiftleadershipcafe.com> website (the “Site”).

This Privacy Policy informs you of our practices related to the collection, use, and disclosure of personal data that may be collected by us when you access or use our Site, and the choices you have associated with that data.

We use your data to provide and improve the Site. By using the Site, you agree to the collection and use of information in accordance with this Privacy Policy. Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible at <https://www.swiftleadershipcafe.com>

### **Information Collection and Use**

We collect several different types of information for various purposes to provide and improve our services to you as well as your use of the Site.

#### **Types of Data Collected**

##### **Personal Data**

While using our Site, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you (“Personal Data”). Personal Data that we collect may include, but is not limited to:

- Email address
- First name and last name
- Telephone number
- Address, City, State, Province, ZIP/Postal code

We may use your Personal Data to contact you with newsletters, marketing, product updates, or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send or by contacting us in any of the manners identified in this Privacy Policy.

##### **Usage Data**

We may also collect information on how the Site is accessed and used (“Usage Data”), whether by computer, mobile phone or other device. This Usage Data may include information such as bandwidth used, system and connection performance, Internet Protocol address (“IP address”), browser type, browser version, the pages of our Site that you visit, the time and date of your

visit, the time spent on each page, unique device identifiers, and other diagnostic data for your computer, mobile phone or other device. Usage Data is collected using technologies such as cookies and is not linked to personally identifiable information.

### **Location Data**

We may use and store information about your location if you give us permission to do so (“Location Data”). We use this data to provide features of our Site and to improve and customize our Site.

You can enable or disable location services when you use our Site at any time by way of your device settings.

### **Tracking Cookies Data**

We use cookies and similar tracking technologies to track the activity on our Site and we hold certain information.

Cookies are files with a small amount of data that may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used such as beacons, tags, and scripts to collect and track information and to improve and analyze our Site.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. If you do not accept cookies, however, you may not be able to use some portions of our Site.

### ***Examples of Cookies we use:***

- **Session Cookies.** We use Session Cookies to operate our Site.
- **Preference Cookies.** We use Preference Cookies to remember your preferences and other various settings.
- **Security Cookies.** We use Security Cookies for security purposes.

### **Use of Data**

Swift HR Solutions, Inc. uses the collected data for various purposes:

- To provide and maintain our Site
- To notify you about changes to our Site
- To allow you to participate in interactive features of our Site when you choose to do so
- To provide customer support
- To gather analysis or valuable information so that we can improve our Site
- To monitor the usage of our Site
- To detect, prevent and address technical issues

- To provide you with news, special offers, and general information about other goods, services, and events that we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information
- To process your payment for the SwiftLeadership® Café

## **Retention of Data**

Swift HR Solutions, Inc. will retain your Personal Data for only as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (e.g., if we are required to retain your data to comply with applicable laws), resolve disputes and enforce our legal agreements and policies.

Swift HR Solutions, Inc. will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Site, or we are legally obligated to retain this data for longer periods.

## **Transfer of Data**

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country, or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

If you are located outside the United States and choose to provide information to us, please note that we transfer the data, including Personal Data, to the United States and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Swift HR Solutions, Inc. will take all the steps reasonably necessary to ensure that your data is treated securely in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

## **Disclosure of Data**

### **Business Transactions**

If Swift HR Solutions, Inc. is involved in a merger, acquisition, or asset sale, your Personal Data may be transferred. We will provide notice before your Personal Data is transferred and becomes subject to a different Privacy Policy.

### **Disclosure for Law Enforcement**

Under certain circumstances, Swift HR Solutions, Inc. may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).



## Legal Requirements

Swift HR Solutions, Inc. may disclose your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of Swift HR Solutions, Inc.
- Prevent or investigate possible wrongdoing in connection with the Site
- Protect the personal safety of users of the Site or the public
- Protect against legal liability

## Security of Data

The security of your data is important to us but no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

### “Do Not Track” Signals under the California Online Protection Act (“CalOPPA”)

We do not support Do Not Track (“DNT”). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked.

You can enable or disable DNT by visiting the Preferences or Settings page of your web browser.

### Your Data Protection Rights under the General Data Protection Regulation (“GDPR”)

If you are a resident of the European Economic Area (“EEA”), you have certain data protection rights. Swift HR Solutions, Inc. aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed about what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

- **The right to access, update, or delete the information we have on you.** Whenever possible, you can access, update, or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.
- **The right of rectification.** You have the right to have your information rectified if that information is inaccurate or incomplete.
- **The right to object.** You have the right to object to our processing of your Personal Data.
- **The right of restriction.** You have the right to request that we restrict the processing of your personal information.

- **The right to data portability.** You have the right to be provided with a copy of the information we have on you in a structured, machine-readable, and commonly used format.
- **The right to withdraw consent.** You also have the right to withdraw your consent at any time where Swift HR Solutions, Inc. relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the EEA.

### **Service Providers**

We may employ third-party companies and individuals to facilitate our Site (“Service Providers”), provide the Site on our behalf, perform Site-related services or assist us in analyzing how our Site is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

### **Analytics**

We may use third-party Service Providers to monitor and analyze the use of our Site.

### **Google Analytics**

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Site. This data is shared with other Google services. Google may use the collected data to contextualize, personalize, and retarget the ads of its own advertising network.

You can opt-out of having made your activity on the Site available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <https://policies.google.com/privacy?hl=en>



## **Payments**

We may provide paid products and/or services within the Site. In that case, we use third-party services for payment processing (e.g. payment processors).

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

The payment processors we currently work with are:

### **Stripe**

Their Privacy Policy can be viewed at <https://stripe.com/privacy>

## **Links to Other Sites**

Our Site may contain links to other sites that are not operated by us. If you click a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

### **Children's Privacy**

Our Site does not address anyone under the age of 18.

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we will take steps to remove that information from our servers.

### **Changes to This Privacy Policy**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new privacy policy on this page. We will update the "effective date" at the bottom of this Privacy Policy when it has been updated.



You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

### **Contact Us**

If you have any questions about this Privacy Policy, please contact us:

- By email: [cafe@swifthrsolutions.com](mailto:cafe@swifthrsolutions.com)
- By visiting this page on our Site: <https://www.swifthrsolutions.com/contact-us>
- By phone number: 888.768.5920
- By mail: 1100 Bellevue Way NE Ste. 8A,#501, Bellevue, WA 98004

This Privacy Policy was updated as of August 2021.