# **Privacy Policy**

# Introduction

The website <u>www.dwstrategicconsulting.com</u> (the "Site") is owned and operated by Drummond Woodsum & MacMahon ("DWM" "we," "our," or "us"). This Privacy Policy explains how DWM collects, uses, and discloses information about you when you visit and use the Site. It applies only to the Site and does not apply to any other websites that we own or operate.

DWM is committed to protecting users' privacy. Please read this Privacy Policy to understand how we collect, use, and disclose your personal information when you visit the Site and what rights you have in relation to your personal information.

By accessing the Site you agree to comply with and be bound by the terms and conditions of this Privacy Policy.

If you do not agree to be subject to this Privacy Policy, please do not use the Site.

#### **Information We Collect**

You are not required to provide any personal information when visiting the Site. However, you may do so by completing various forms found on the Site, including:

- Registering for an event
- Signing up for one of our publications
- Filling in a contact us form

In addition, our Site gathers certain information about our Site traffic for administrative, security, and analytical purposes. This information may include your IP address, browser type, referring and exit pages, operating system and dates/times of page views. You may also provide us with personal information if you contact us by e-mail, telephone or letter.

## Cookies

We use "Cookies" and other similar web technologies on the Site. When you access our Site, a small file called a "Cookie" is placed on your hard drive. Cookies generally hold information, including data strings that contain a unique user ID. Each time you visit the Site Cookies will be used to authenticate your identity, collect data generated in connection with your activity on the Site, and to personalize your user experience on the Site, including by remembering and presenting you with your order information (i.e. history and purchases). We may use cookies to analyze visitor traffic patterns in order to improve visitor experience. We do not correlate this information with data about individual users. A session ID cookie expires when you close your browser. We use session cookies to make it easier for you to navigate the Site. A persistent cookie remains on your hard drive for an extended period of time. We use persistent cookies to recall what information you have viewed in prior visits to the Site.

Most browsers are initially set up to accept Cookies, but you can reset your browser to refuse all Cookies or to indicate when a Cookie is being sent. In addition, when visiting the Site for the first time, an option is presented allowing you to disable the use of Cookies. However, some Site features and services may not be available to you if Cookies are disabled.

# **Use and Disclosure of Information**

DWM will only use your information for the purposes and in the ways described in this Privacy Policy or as subsequently authorized by you in writing. We may use information we gather on or through the Site in the normal course of our business, including: to improve the content of the Site, to customize the content of the Site, to provide you with information that may be of interest to you or your business.

When you have provided us with your personal information to receive newsletters or other marketing communications, we will store that information until you notify us that you no longer wish to receive these communications, or we determine that the information is no longer accurate. Information about your IP address, browser and operating system, page links and page views is automatically deleted after 30 days.

# **Use and Disclosure of Information**

We use various third parties to operate the Site and to perform other services. We may disclose personally identifiable information to such entities as needed for them to perform their specific tasks under our instructions, subject to this policy.

In particular, our Site uses Google Analytics to help collect and analyze certain information for the purposes discussed above. You may learn more about Google Analytics' data practices by clicking here and opt out of the use of cookies in web browsers by Google Analytics by clicking here.

In addition, we may disclose any and all information collected if, in reasonable good faith, it believes it is required to do so to comply with any local, state, federal or foreign law, to respond to a court order, any court or governmental subpoena (or its equivalent), or any domestic or foreign governmental investigation. We also reserve the right to disclose information collected that we believe, in reasonable good faith, is appropriate or necessary to protect against liability; to protect against fraudulent, abusive or unlawful uses; to investigate and defend DWM against any third-party claims or allegations of wrongdoing; to assist domestic or foreign government enforcement agencies; to protect against fraudulent uses the rights, property (including intellectual property) or safety of DWM, users of the Site, or other persons or entities.

#### Marketing Choice and Your Rights to Access and Correct Your Personal Information

To opt out of receiving marketing communications from us, notify us at info@dwmlaw.com.

We want to make sure that your personal information is accurate and up to date. You have the right to request access to and correction or deletion of your personal data, restrict processing concerning you and object to processing, as well as the right to data portability.

We will provide you with access to your personal information on request so you may view, update or correct your information. To protect your privacy and security, we will verify your identity before granting you access or enabling you to make corrections.

To access or correct your personal information, notify us at info@dwmlaw.com.

# **Third-Party Websites**

This Privacy Policy does not apply to third parties that DWM does not own or control, including, but not limited to, any third-party websites, services, and/or applications that you are able to access from or through the Site, or to individuals that we do not manage or employ. This includes, but is not limited to, the third-party that we use to process credit card payments you make related to items on the Site. Also, when you leave the Site, whether by clicking on third-party sponsored content or advertising, or by directly accessing another website, third-parties may place Cookies or web beacons on your computer. This Privacy Policy does not govern the use and disclosure of any information collected by third parties, including information collected through Cookies or web beacons, when you visit their websites.

# **Children and Privacy**

The Site is not directed at children, and it is not intended that we collect personally identifiable information from children. If you are a parent or guardian of a child who you know to have provided us with personally identifiable information, we ask that you contact us using the contact information provided below and request that such information be deleted. The Site is not intended for the use of any one under the age of eighteen.

# **Our Commitment to Data Security**

To prevent unauthorized access, improper use or disclosure, unauthorized modification or unlawful destruction or accidental loss, and to ensure the correct use of information, we employ physical, technical and administrative procedures to safeguard this Site and the personal information we collect on this Site. All of our employees and any third parties we employ to process your personal information are obliged to respect its confidentiality. However, transmission of information through the internet is not secure. Although we seek to protect your information as described above, we cannot guarantee the security of any information you transmit to the Site or to us via the Site, and you transmit such information at your own risk

# Your California Rights

If you are a California resident, California law provides you with specific rights regarding your personal information, including the right to request that we disclose certain information to you about the collection and use of your personal information over the past 12 months and the right to request that we delete any of your personal information that we have collected from you, subject to certain exceptions. To make such a request, contact us at twilber@dwmlaw.com and indicate in your message that you are making a CCPA request. Please note that we are only required to respond to two such requests per customer each year.

You also have the right not to be discriminated against if you exercise any of your rights under California privacy law.

DWM may have collected the following categories of personal information of California residents who visited the Site in the past 12 months:

- Identifiers such as a name, title, biographical information (from other sources in the course of our business), social media identifiers, physical address, Internet Protocol address, email address, or other, similar identifiers.
- Internet or other electronic network activity information.

This information is collected and used for the purposes disclosed in this Privacy Policy. DWM does not sell the personal information of visitors to the Site and has not done so in the past 12 months. DWM may have disclosed any of the above categories of personal information pursuant to an individual's consent or under a written contract with a service provider for a business purpose in the past 12 months.

DWM operates other websites, including extranet sites we offer for the convenience of our clients. This Privacy Policy applies only to this Site and not to any other site that we own or operate.

#### **Changes to Our Privacy Policy**

We regularly review our privacy policy to ensure that it provides an appropriate level of protection for your personal information and we may make changes to our privacy policy to keep it current with industry standards. We will post the date of the most recent revisions on this page. Check this page to make sure that you are current and up-to-date on our privacy policy.

This Privacy Policy and your use of the Site is governed by the laws of the state of Maine, U.S.A., without regard to its conflicts of law provisions.

#### **DWM Contact Information**

For questions or complaints regarding this Privacy Policy, your personal information, our disclosure practices, or your consent choices, please contact us at:

Drummond Woodsum & MacMahon Attn: Privacy 84 Marginal Way Suite 600 Portland, Maine 04101-2480

Email: info@dwmlaw.com

We will review your communication promptly and respond to you upon completion of its review.

#### Policy Effective Date / Date Policy Last Modified

The effective date of this Privacy Policy is June 11, 2021.