

## **Trexin Privacy Notice**

**LAST UPDATED: MARCH 12, 2021**

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 (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 Site. 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, LLC (“Trexin,” “we,” “our,” or “us”) specializes in strategy execution – the implementation of business strategy to achieve targeted business goals. Applied strategy situations that Trexin frequently leads include: digital transformations for business, 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 four capabilities essential to strategy execution: Strategy & Innovation, Program Execution, Technology, and Analytics.

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

We may collect two kinds of information via the Site: (i) Personally Identifiable Information you provide in using our Site; and (ii) Non-Personal Data. We are the owners of or have the rights as specified in this Privacy Notice to the information you provide and/or we collect through our Site.

- Personally Identifiable Information

Personally Identifiable Information (“PII”) is information that identifies you or is capable of identifying you. PII includes information such as your name, email address, address, phone number or any other data that may be used to identify you.

We may collect PII when you provide such information on our Site when you use the “Contact Us” function on our Site or you sign up for a meeting. We do not require you to set up a user account

to access or use our Site. We only have access to/collect information that you voluntarily provide us via our Site, any email you send, or other direct contact from you. 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.

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.

- Non-Personal Data

As you interact with the Site, we may also collect information that is not PII with software application tools and data files, such as cookies, web log files, IP addresses, device state information, unique device identifiers, device hardware and OS information (“Non-Personal Data”). You may be able to control such Non-Personal Data through the control settings on your device. Our use of Non-Personal Data does not allow us to gather PII from your device.

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 website, 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. 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.

### **Disclosure of Information**

We do not sell, trade, or rent your PII to or with others. We do not use your PII other than to provide our services, the Site or to respond to your communications, unless we are required by law, by contract, or in the event Trexin assigns its rights in the event of a sale of all or substantially of its assets (e.g., through acquisition or merger). In no circumstance will we sell your PII to third parties for marketing purposes.

PII and Non-Personal Data may be provided to certain of our third party service providers as necessary to provide our Site and related functionality. These third party service providers are under contract with us either as our data source, or to provide software development, application and data hosting, wireless network service providers, and any digital marketing services (collectively “Third-Party Providers”). Where we disclose your PII to our Third Party Providers, we will require those organizations 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 and comply with the terms of this Privacy Notice.

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 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 will protect your PII consistent with this Privacy Notice. However, no website, database or system is completely secure or “hacker proof.” You are also responsible for taking reasonable steps to protect your PII against unauthorized disclosure or misuse.

### **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. We reserve the right, 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, to transfer your PII subject to the terms of this Privacy Notice, as it is amended from time to time.

## **Your Rights**

You may opt out of any future contact from us at any time. Depending on where you live, you may have certain legal rights under applicable law. For example, you may have the following rights:

- Right to access – means you can ask us for a copy of any PII we have about you, if any.
- Right to correct – means you may ask us to change and/or correct any PII we have about you.
- Right to delete – means you may ask us to delete any PII we have about you and we will be happy to do so unless we are required to retain such information by law or regulation, or we have a right to retain subject to a user agreement for our internal business purposes.
- Right to transfer – means you may request a copy of your PII, in a commonly used and machine-readable format, be provided to you or to a third party you specify.
- Right to opt-out – means you may ask us to not use your PII for any future marketing purposes.

We may update our Privacy Notice from time to time. We encourage you to review our Privacy Notice frequently to stay informed regarding how we collect, use, share and process PII. You may contact us at any time about any of these rights or any concern or question you have about our use of your PII.

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

In compliance with the Children’s Online Privacy Protection Act, 15 U.S.C. § 6501.06 and 16 C.F.R. §§ 312.1 – 312.12, we do not knowingly collect or solicit information from anyone under the age of 13, nor do our services target children under the age of 13. By using our Site, you represent that you are not younger than 13.

In the event that we learn that we have collected PII 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.

## **Do Not Track Disclosures**

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. Due to the differences in browser settings, we cannot commit to be able respond to all browser requests. As specified above, Trexin only tracks your movement into the Site and from page to page within the Site. Trexin does not track your movement to any third party site outside of the Site.

## **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. Our systems are located in the United States. If you are located anywhere outside of the United States, please be aware that information we collect, including PII, may be transferred to, processed in, and stored 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.

If you are a resident outside of the United States, please be aware that data protection laws in the United States may differ from those of the country in which you are located, and your PII can be subject to access requests from governments, courts, or law enforcement in the United States in accordance with and subject to the laws of the United States.

### **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 PII, 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. For as long as we have your PII, we will continue to protect the privacy and security of such PII consistent with this Privacy Notice. When we no longer require your PII, we have procedures in place to destroy, delete, or erase it, or, at our election, de-identify 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, your rights, 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. Trexin will respond to your individual rights requests in compliance with applicable law.