

# Beghou's Privacy Policy

Last updated: [\_\_\_\_\_]

Beghou Consulting, LLC (referred to herein as “Beghou,” “we,” “us,” or “our”) fully understands the need to protect your privacy and has developed this policy to safeguard your data in accordance with the relevant regulations and laws.

This Privacy Policy (referred to herein as “Policy”) describes how we gather and process your personally identifiable information “PII” throughout our website, located at [beghou.com](http://beghou.com) (referred to herein as the “Site”) and explains how, why and when we process your personal data.

The Policy shall apply to all information collected on the Site for products and services offered by Beghou. The Policy DOES NOT apply to any service or SaaS-specific agreement, data processing agreement or data use agreement provided by Beghou, which shall supersede this Policy with respect to that particular service.

Please carefully read this Policy. By using this Site or obtaining any product or service through this Site, you agree to the limited collection and use of information as outlined in the Policy. If you do not agree to this Policy, please do not use the Site.

We may from time to time update the Policy to reflect on changing technology and other factors. We will notify you of changes to the Policy by posting the updated Policy on this page. We ask that you bookmark and periodically review this page to ensure that you remain familiar with the most current version of the Policy.

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## Definitions

Unless otherwise defined in the Policy, the terms used in the Policy have the same meaning as in our Services or other Terms and Conditions.

### Service

Service means any products, services, or content made available through or offered by Beghou. Site or Website refers to any content found on <http://beghou.com> hosted by HubSpot.

### Personal Data

Personal Data refers to any data that either directly or indirectly identifies an individual, including identifiable information about a user of our Site, or any Beghou online or mobile application, that is collected from that user and maintained in an accessible form.

### Usage Data

Usage Data refers to information that is automatically collected when you interact with the Site or that is collected and sent by your browser whenever you visit our Site.

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

### **Information We Collect**

#### **Personal Data**

While using our Service, we may use and store your Personal Data to improve the Service. We may send marketing emails (e.g. newsletters, etc.) to individuals who voluntarily provide their information via forms on our Site. For instance, information entered into the “subscribe to our alerts” box at the bottom of the homepage or information entered into the form that users must fill out to read a white paper.

#### **Usage Data**

We may also collect Usage Data, which may include information such as your computer’s 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 those pages, unique device identifiers and other diagnostic data.

When you access the Service with a mobile device, this Usage Data may include information such as the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

#### **Information You Provide to Us Directly**

We collect Personal Data that you may provide to us through your use of our Site, ordering and purchasing our Services, calling us for information or support through our website chat, email, or otherwise. In doing so, we may gather information such as, but not limited to, your name, shipping address, billing address, email address(es), cookies containing Personal Data, IP Address, web browser settings, phone number(s), and payment card information.

#### **Information Automatically Collected through the Use of Our Site**

##### **Analytics, Cookies, and Pixels**

Our Site utilizes various tracking technologies such as analytics tools, cookies, and pixels to enhance your experience, analyze site performance, and improve the effectiveness of our services. The information gathered with these technologies includes data that in some jurisdictions could be considered personally identifiable information and sensitive personally identifiable information as well as anonymized, non-personally identifiable information. These technologies work together to collect, process, and sometimes share information about your online activities. Below is a detailed explanation of each and how they function in compliance with laws such as the California Consumer Privacy Act (CCPA), Virginia Consumer Data Protection Act (VCDPA), and Colorado Privacy Act (CPA) & other U.S. States that may have applicable Data Privacy Laws.

All such information is collected in real time as one accesses and navigates all areas of our website and is transmitted in real time to our third-party aggregators, advertisers, and analytics providers.

## ***Analytics***

### **What are Analytics?**

Analytics tools, such as Google Analytics, are software that collects and processes data about how visitors interact with our Site. These tools track metrics like page views, bounce rates, time spent on pages, and other interactions to help us understand and improve the Site's performance.

### **How Analytics Work**

Analytics software uses tracking codes embedded within our Site to gather information about your browsing behavior, including the pages you visit, the time and date of your visit, your IP address, browser type, and device identifiers. Analytics tools may process this data in combination with other information, such as unique IDs stored in cookies, to deliver more detailed insights.

### **Information Collected**

- Site usage statistics (pages visited, time on site)
- IP address and geolocation data
- Browser type and device information
- Referring to website or source of visit

### **How Analytics May Share Data**

The data collected by analytics tools may be shared with third-party service providers or advertising partners. Under some privacy laws, this sharing could be considered a "sale" of your personal information, especially when combined with data collected through cookies or pixels. However, Beghou does not sell or share your personal information in exchange for monetary compensation.

Beghou uses HubSpot's built-in web traffic analytics tool to track, measure, and report on how visitors find and interact with our website. More information about HubSpot's privacy practices may be found on their website's Privacy Policy: <https://legal.hubspot.com/privacy-policy>

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic.

Google Tag Manager deploys and manages marketing and analytics tags to support tracking and analysis of site traffic.

Google uses non-personally identifiable, anonymized data collected by us to track and monitor the use of our Site. This non-personally identifiable, anonymized data is shared with other Google services.

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

## Site Analytics Session Replay

Our Site uses website session replay analytics software that automatically collects information on how you interact with our site to help us improve our Site by fixing broken links or providing better access to the information you are seeking. Our analytics software collects information such as what pages you visit, links clicked, referring URL, browser and operating system of your device, cookie information, mouse movements as well as text that you enter into forms on our Site - even if you subsequently delete the information typed into a form and do not submit such information. Such information enables us to replay how you interacted with our Site. For the avoidance of doubt, this software does not track anything on your computer – it only tracks signals that your computer sends to our Site when you interact with it. We use various vendors to collect this analytics data, and your information is disclosed to them for the purpose of providing their analytics services to us. Your information is not transmitted to such vendors for any other purpose.

## Cookies

### What are Cookies?

Cookies are small pieces of data (text files) that a website stores on a your device through your web browser when you visit the website. Cookies are used to remember information about the you, such as your preferences and login information, and to enable core website functionality. Cookies may also be used to track and analyze your browsing behavior.

- **First-Party Cookies.** First Party Cookies are cookies set up directly by Beghou. First-Party Cookies are typically used to support core site functionality, such as remembering preferences, login information or previous interactions with the Site.
- **Third-Party Cookies.** Third-Party Cookies are set by a domain different than the domain of the website you are visiting. Beghou may use Third-Party Cookies to support our advertising, marketing, and analytics efforts.

### How Cookies Work

Cookies can be either session-based (lasting only while your browser is open) or persistent (remaining on your device after you close your browser). They store data such as login credentials, user preferences, and tracking identifiers, which can be accessed by our Site or third-parties to enhance your experience or deliver targeted advertising.

### Information Collected

- Unique user identifiers
- Login information and user preferences
- Browsing history on our Site

- Interaction with advertisements

### **How Cookies May Share Data**

Cookies work in conjunction with analytics tools and pixels to store and transfer personal information like user IDs and browsing behavior. This information can be shared with third-party partners to deliver personalized ads or analyze user behavior. As defined by certain privacy laws, this data sharing may qualify as a "sale" of your personal information. However, Beghou does not sell or share your personal information in exchange for monetary compensation.

### **How to Control the Use and Sharing of Cookies**

When you visit our Site for the first time, or any time after you clear all of your cookies, depending on your geographic location, you may have the ability to adjust what categories of cookies our Site will enable and share when you navigate our Site.

There are also many free browsers available for your use that have built-in capabilities to block and control cookies, regardless of a website's usage of cookies.

## **Pixels**

### **What are Pixels?**

Pixels, also known as tracking pixels or web beacons, are tiny, invisible images embedded within web pages or emails that track your actions and behavior. Pixels provide valuable insights into the effectiveness of marketing campaigns and track conversions.

### **How Pixels Work**

Pixels activate when you load a web page or open an email, sending information about your activity (such as pages visited, time spent on the web page, or interactions with content) back to the server. Pixels often work in conjunction with cookies to transfer more detailed information, such as unique user identifiers, to analytics platforms or advertising networks.

### **Information Collected**

- IP address and geolocation data
- User activity on our site (e.g., clicks, scrolls)
- Time and date of website visit
- Information from cookies (e.g., unique user IDs)

### **How Pixels May Share Data**

Pixels often share information with third-party service providers to measure the effectiveness of advertising campaigns or improve the targeting of ads. This sharing may involve personal identifiers stored in cookies or analytics tools, which could be considered a "sale" of personal information under applicable data privacy laws. However, Beghou does not sell or share your personal information in exchange for monetary compensation.

Depending on the service provider or third-party that hosts the pixel, you may already have an established account and relationship with that third-party provider, such as Facebook. Because of that, your unique user ID with that third-party provider may be shared with that provider along with the pixel data from our Site.

Pixels also assist us in assessing the accuracy and performance of our advertising and marketing campaigns.

### **Data Sharing through Analytics, Cookies, and Pixels**

We may share the information collected through analytics, cookies, and pixels with third-party service providers, related parties (such as partners and affiliates), and advertisers or analytics platforms, for purposes such as improving the performance of our website or delivering targeted ads. Some privacy laws, like the CCPA, consider the transfer of personal information for these purposes as a "sale." However, Beghou does not sell or share your personal information in exchange for monetary compensation.

### **Your Control Over Data Collection through Analytics, Cookies, and Pixels**

You have the ability to control the types of information collected through these technologies by adjusting the settings within your browser or choosing a browser that blocks such content by default. You can choose to opt out of certain cookies or limit data sharing for advertising purposes. By refusing or disabling certain cookies, you may still access our Site but some content may not load or work as expected.

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## ***How We Use Your Personal Data***

Beghou takes your privacy very seriously and will never sell your Personal Data to anyone in exchange for monetary compensation. However, we do share your Personal Data via automated technologies and certain U.S. and foreign data protection laws may deem this to be a form of "sale" or "sharing" of personal data. We only use your Personal Data for the purpose(s) specified in this Policy. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time.

We may use, or disclose the personal information we collect for one or more of the following purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a consultation or ask a question about our products or services, we will use that personal information to respond to your inquiry.
- To personalize your Website experience and to deliver content or offerings relevant to your interests, including targeted ads via e-mail (with your consent, where required by law).
- To help maintain the security of our Web site, products and services, databases and other technology assets, and business.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.

- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Beghou's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Beghou is among the assets transferred.
- To provide services to Beghou's clients.
- To provide, support, personalize, and develop our website, products, and services.
- For testing, research, analysis, and product development, including to develop and improve our website, products, and services.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

### **Non-Personally Identifiable Information**

Our Site, beghou.com, also collects and uses non-personally identifiable information, such as your IP address and the pages that you visit on our Site, to help diagnose problems with our servers and to administer our Site and improve Site-related services and features. Your IP address and other information may also be used to gather broad demographic information and to recognize customer traffic patterns and Site usage trends. This information aids us in merchandising and in developing the design and layout of the Site.

Our Site may also share aggregated statistical data and other non-personally identifiable information with our current and potential business partners and third-party service providers to allow them to provide similar services.

Our Site may sometimes administer online surveys in connection with the Site in which we ask you for demographic information and opinions. We do not ask you for personally identifiable information as part of a survey. We use the collected survey data on an aggregated basis to better understand the needs of all of our customers.

### **Personally Identifiable Information collected directly**

Our Site collects personally identifiable information provided directly by you, upon completion of account sign-up forms, order forms, or email and marketing opt-in forms and/or when you provide information over the telephone and we use this information to provide you with requested and initiated services, such as sale, processing and delivery of orders and preventing fraud. Your personally identifiable information may also be used to contact you when necessary to provide order updates and answer any questions you may have. The personally identifiable information you provide may include the following information, which we use as indicated below:

- Name — used for order fulfillment and marketing.
- Mailing, Shipping and Billing Addresses — used for order fulfillment and marketing.
- Email Address — used for order status communication and marketing.
- Telephone Number(s) — used for order status communication and marketing.
- Credit Card or Debit Card Number — used for payment for orders.
- Company name.
- Free form text input that may contain personally identifiable information.

Our Site also uses personally identifiable information to further develop our marketing efforts to send you ads that are most relevant to your interests.

Our Site may also use personally identifiable information to contact you to make sure you are satisfied with our Service or to find out how we can serve you better. Your decision to participate in any survey or questionnaire about this is completely voluntary. Further, we may use personally identifiable information to conduct in-depth marketing research regarding our customers and potential customers.

Our Site may use your personally identifiable information to "pre-populate" forms that are used by the Site to facilitate transactions with us and save you from entering every data field on the checkout.

We may use your personally identifiable information to send you periodic announcements regarding your order, status updates, service changes concerning the Site and other administrative matters. We may also, from time to time, send you information regarding new features, products and/or services and special offers we think you will find valuable. If you would like to opt out of receiving promotional communications from us, please follow the procedure outlined in the Opt-Out section below.

### **Financial Information**

Financial information (credit card numbers, credit card expiration dates, billing address, and so forth) is used solely to bill you for the Service and we make every effort to keep your information secure from theft or fraud.

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## ***How We Disclose Your Personal Data***

Except as provided in this Policy, we do not share or disclose any of your Personal Data without your consent.

The following are special circumstances and parties for which we may disclose personally identifiable information:

### **Service Providers**

As described in this Policy, we work with third-party service providers, who provide services including but not limited to website hosting, order processing and fulfillment, age verification, credit card clearance, e-commerce affiliation, data analysis, website analytics, emailing, chat, marketing, targeting and other services. Some of these third-party service providers may be given access to some or all of the information that you provide to us and may use cookies or other tracking technologies in connection with providing their services. To the extent that we provide your personally identifiable information to such third-party service providers, we will restrict their ability to use such information for their own marketing purposes to the best of our abilities.

We may also employ third-party services providers to facilitate, manage and maintain the Site on our behalf. The third-party service providers may also perform Site-related services or assist us in analyzing how our Site is used. These third parties may have access to your Personal Data only to perform these tasks on our behalf and are required not to disclose or use it for any other purpose.

### **Related Companies**

We may share personal information we collect about you with related companies for purposes consistent with this Policy for marketing and advertising purposes.

### **As Required by Law**

Subject to applicable law, we reserve the right to release any information concerning any Site visitor, where such visitor is believed to be in violation of his or her obligations to us, and/or is partaking (or is suspected of partaking) in any illegal activity. We also reserve the right to release your information in response to civil subpoenas, court orders and/or discovery requests, to protect the interests of Beghou, our customers or others, and as otherwise permitted or required by law as regards to these special cases.

Beghou uses third parties to provide certain services and business functions and may share your personal information with such service providers, related parties (including but not limited to business partners and affiliates) for purposes such as order and payment processing, website functionality and the marketing of products. Keep in mind that, while we encourage all third parties involved in running our business to adhere to our policies regarding the privacy of our visitors and to handle personally identifiable information in a responsible manner, we cannot and do not assume any responsibility for any actions or omissions of third parties, including the manner in which they use information received either from beghou.com or independently.

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## ***Your Right to OPT-OUT***

At any time, you can adjust how beghou.com markets to you or even Opt-Out completely.

You do not need to create an account with us to exercise your opt-out rights. We will only use personal information provided in an opt-out request to review and comply with the request. You can opt out of emails from beghou.com as well as mailings from third-party marketers by using this link: <https://beghou.com/disable-tracking/> or send your written opt-out requests to this address:

*Beghou Consulting, LLC*  
*Attention: Privacy*  
*909 Davis Street, Suite 650*  
*Evanston, IL 60201*  
*Email: [privacy@beghou.com](mailto:privacy@beghou.com)*  
*Tel. No.: (847)864-5480*

Please allow up to two weeks for your request to be processed.

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sharing.

Consumers who opt-in to personal information sharing may opt-out of future sharing at any time.

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## ***Protection of Data***

We implement a variety of security measures to maintain the safety of your Personal Data when you enter, submit, or access your personal information. We offer the use of a secure server. All supplied sensitive/credit information is transmitted via Secure Socket Layer (SSL) technology and then encrypted into our Database to be only accessed by those authorized with special access rights to our systems and are required to keep the information confidential.

### **Legal Basis and Purpose for Collecting and Processing Personal Data under the European Union General Data Protection Regulation (EU GDPR)**

If you are from the European Economic Area (EEA), Beghou's legal basis for collecting, handling, and using the Personal Data described in this Policy depends on the Personal Data we collect and the specific context in which we collect it. The Personal Data shall be handled in accordance with EU GDPR regulations. The Personal Data we use consists of the following groups and types of information you provide while using the Site: your name, email, and any other information entered by you in free text fields.

### **Legal Basis and Purpose for Collecting and Processing Personal Data under the California Consumer Privacy Act (CCPA)**

If you are a resident of California, Beghou's legal basis for collecting, handling and using the Personal Data described in this Policy depends on the Personal Data we collect and the specific context in which we collect it. The Personal Data shall be handled in accordance with CCPA regulations. The Personal Data we use consists of the following groups and types of information you provide while using the Site: your name, email, and any other information entered by you in free text fields.

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## ***Your Data Protection Rights and Control Over Data Collection***

You have the right to control the types of information collected through these technologies by adjusting your preferences in our cookie banner or by adjusting the settings within your browser. You can choose to disable cookies through your browser configuration or your browser choice, or limit data sharing for advertising purposes. By refusing or disabling certain cookies, you may still access our Site but some content may not load or work as expected.

If you are a resident of the European Economic Area (EEA) or a U.S. State with specific privacy laws governing the collection, processing, storage and sale of Personal Data, you may have

certain additional data protection rights. Beghou aims to take reasonable steps to allow you to correct, amend, delete or limit the use of your Personal Data to comply with these protection rights.

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 by contacting us at [privacy@beghou.com](mailto:privacy@beghou.com)

In certain circumstances, you may exercise your data protection rights by contacting us at [privacy@beghou.com](mailto:privacy@beghou.com)

### **Special Categories of Data**

Owing to the products, services or treatments that we offer, Beghou sometimes needs to process PII that may be considered “sensitive” personal information or Protected Health Information or health-related information in general (also defined as a *special category data*) about you, as a consequence of the type of products we sell. Such information may be transmitted to our third-party service providers and related parties (such as partners or affiliates), as a result of our website analytics. However, Beghou does not sell or share your personal information in exchange for monetary compensation.

Where we rely on your consent for processing special category data, we will obtain your explicit consent through a checkbox on our website. You can modify or withdraw consent at any time, which we will act on immediately, unless there is a legitimate or legal reason for not doing so.

### **Consequences of Not Providing Your Data**

You are not required to provide your Personal Data to Beghou. However, certain Personal Data is required for us to provide you with our services and deliver your products. We will not be able to offer some or all of our services without it.

### **How Long We Keep Your Data**

Beghou only ever retains Personal Data for as long as is necessary to serve the purposes described in this Policy. We will also retain and use Personal Data for as long as necessary to comply with legal, regulatory, accounting or reporting obligations, to resolve disputes, and to enforce our agreements.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

### **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 United States and choose to provide information to us, please note that we transfer the data, including Personal Data, to United States and process it there. For data originating from European Economic Area (EEA), data shall be transferred in accordance with GDPR.

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

Beghou Consulting LLC will take all the steps reasonably necessary to ensure that your Personal Data is treated securely and in accordance with this 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**

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information. This does not include trusted third parties who assist us in operating our website, conducting our business, or servicing you, so long as those parties agree to keep this information confidential. We may also release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property, or safety. However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

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### **Minors Privacy**

We are in compliance with the requirements of COPPA (Children's Online Privacy Protection Act), as we do not knowingly collect, sell to, advertise to, communicate with, or otherwise obtain any information from anyone under 13 years of age. Our Site does not address anyone under the age of 18 ("Minor", "Minors"). If you are under the age of 18, do not use the Site or provide any information to the Site. We do not knowingly collect, sell to, advertise to, communicate with, or otherwise obtain personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Minor has provided us with Personal Data, please contact us at:

*Beghou Consulting, LLC*  
*Attention: Privacy*  
*909 Davis Street, Suite 650*  
*Evanston, IL 60201*  
*Email: [privacy@beghou.com](mailto:privacy@beghou.com)*  
*Tel. No.: (847)864-5480*

If we become aware that we have collected Personal Data from Minors without verification of parental consent, we take immediate steps to remove that information from our servers.

## ***Privacy Notice for California Residents***

California residents have certain rights regarding our collection and use of personal information under the California Consumer Privacy Act of 2018) as amended by the California Privacy Rights Act (CPRA) (effective January 1, 2023) (“CCPA”).

This California Privacy Notice supplements this notice, and it uses terms that have the meaning assigned to them within the CCPA.

We may collect and may have collected the categories listed in this privacy notice above during the 12-month period prior to the last updated date of this California Privacy Notice.

We may have also collected certain protected classifications of information under California or federal law, including, but not limited to sex, gender, gender identity, gender expression, sexual orientation and geolocation.

We may use and may have used the above personal information for the purposes described in this policy in the 12-month period prior to the last updated date of this California Privacy Notice.

As stated above in the general Policy, we do not sell your personal information in exchange for monetary compensation. However, we may share your personal information and sensitive personal information with certain third parties and related parties (including but not limited to partners and affiliates) via automated technologies within our website and advertising material that may be considered a “sale” or “sharing” under California law. You have a right to opt-out of these disclosures and may do so by contacting, using our cookie banner to limit the information collected by third parties, or by adjusting your browser settings to block the use of third-party scripts, cookies, pixels and other tracking technologies.

We may sell or share personal information listed above in this Policy for cross-context behavioral advertising purposes and may have sold such data during the 12-month period prior to the last updated date of this California Privacy Notice. However, Beghou does not sell or share your personal information in exchange for monetary compensation.

### **California Residents Rights**

**The CCPA provides California residents with certain rights with respect to their personal or sensitive personal data that Beghou collects or has collected. This section describes your CCPA rights and explains how to exercise those rights.**

California residents may:

- Request to Delete: You have the right to delete your personal information we have collected.
- Right to Know: You have the right to request, twice within a 12-month period, information about the following:
  - The categories and specific pieces of personal information we have collected about the you;
  - The categories of sources from which we have collected your personal information.
  - The business or commercial purpose for collecting or selling your personal information;
  - The categories of personal information we have sold about you; and

- The categories of third parties with whom we have shared, disclosed for a business purpose, or sold your personal information, and which categories of personal information we have sold to which categories of third parties.
- Right to Correct: You have the right to correct any inaccurate personal information we possess about you.

We will not discriminate against you for exercising their rights under the CCPA.

### **California Residents Exercising Privacy Rights**

If you are a California resident, you or someone legally authorized to act on your behalf, may exercise the rights listed above. Upon receiving a request from you, we will take reasonable steps to verify your identity. We will respond to a verified request from you by: (a) providing the requested information; or (b) explaining to you why the Act does not require us to provide the requested information or perform the requested deletion or correction.

We will respond to requests for information within 45 days. If a response requires additional time, we will notify you of the basis for the delay and may extend our response period up to an additional 90 days. If the Act requires us to provide the information requested to you, we will provide the information covering the 12 months preceding the request, free of charge, and in a readily useable portable format. We have no obligation to provide personal information to you more than twice in a 12-month period. If a request or series of requests are manifestly unfounded or excessive, we may charge a reasonable fee for processing the request(s), or may refuse to process the request(s).

To exercise these rights, please contact us via:

The interactive form at <https://beghou.com/disable-tracking/> or

Email at [privacy@beghou.com](mailto:privacy@beghou.com).

Tel. No.: (847) 864-5480

Additionally, you make contact us toll free at: 1 (833) 793-9429

### **Request to Delete**

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

- 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.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.

- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- 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.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

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## ***Other California Privacy Rights***

### **Our Policy on “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 Do Not Track by visiting the Preferences or Settings page of your web browser.

### **California Online Privacy Protection Act Compliance**

Because we value your privacy, we have taken the necessary precautions to be in compliance with the California Online Privacy Protection Act. We therefore will not distribute your personal information to outside parties without your consent.

As part of the California Online Privacy Protection Act, all users of our site may request any changes to their information anytime by sending an email to [privacy@beghou.com](mailto:privacy@beghou.com)

### **California Shine the Light**

If you are a California resident and have an established business relationship with use, you can request a notice disclosing the categories of personal information we have shared with third parties for the third parties' direct marketing purposes during the preceding calendar year, in accordance with California's “Shine the Light” law (Civil Code Section § 1798.83).

To request a notice, please submit your request via email to [privacy@beghou.com](mailto:privacy@beghou.com) or write us at:

Beghou Consulting LLC,  
909 Davis Street, Suite 650,

Evanston, IL 60201

Please allow 30 days for a response.

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## ***Personal Data We Have Collected, Disclosed, or Sold***

### **Personal Data Collected**

In the preceding 12 months, we have collected the following categories of Personal Data about California residents in addition to the categories listed above in this Policy:

- Name
- Date of Birth
- Postal Address
- Mailing Address
- Billing Address
- Shipping Address
- E-mail Address
- Telephone Number(s)
- Records of Products/Services Purchased
- Internet Protocol (IP) Address and Geolocation
- Analytics
- Device information (e.g. device model, operating system, device date/time, unique device identifiers, network information)
- Sensitive Personal Information

### **Personal Data Shared for a Business Purpose**

In the preceding 12 months, **we have shared for a business purpose** the following categories of personal information about California Users:

- Identifiers – such as real name, postal address, email address, online identifier, ip address or other similar identifier.
- Commercial information – such as records and history of products of services purchased or considered.
- Internet or Other Electronic Network Activity: such as browsing history, search history, or information on interaction with a website or advertisement.
- Geolocation Data: In some cases, we may collect your physical location to provide you location-related services.
- Sensitive Personal Information.
- Inferences drawn from any of the above information. (According to California law, personal information does not include (i) publicly available information from government records or (ii) de-identified or aggregated consumer information).

## **Personal Data Shared for a Valuable Consideration**

In the preceding 12 months, **we have shared for a valuable consideration** the following categories of personal information about California Users:

- Identifiers – such as real name, postal address, email address, online identifier, ip address or other similar identifier.
- Commercial information – such as records and history of products or services purchased or considered.
- Internet or Other Electronic Network Activity: such as browsing history, search history, or information on interaction with a website or advertisement.
- Geolocation Data: In some cases, we may collect your physical location to provide you location-related services.
- Sensitive Personal Information.
- Inferences drawn from any of the above information. (According to California law, personal information does not include (i) publicly available information from government records or (ii) de-identified or aggregated consumer information).

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## ***Lodging a Question or Complaint***

Beghou only processes your Personal Data in compliance with this Policy and in accordance with the relevant data protection laws. If, however, you have a question about this Policy, the data collection and usage practices of this Site, your dealings with this Site, or wish to exercise your rights, please do not hesitate to contact us at:

### **Interactive Form:**

<https://beghou.com/disable-tracking/>

### **Website:**

<https://beghou.com/>

### **Email:**

[privacy@beghou.com](mailto:privacy@beghou.com)

### **Mailing Address:**

Beghou Consulting LLC  
Attention: Privacy  
909 Davis Street, Suite 650,  
Evanston, IL 60201

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**State Privacy Notice for residents of Colorado, Connecticut, Delaware, Iowa, Indiana, Montana, New Jersey, Oregon, Tennessee, Texas, Utah, Virginia, and various other states that may have applicable data privacy laws.**

We collect the categories of personal data, sensitive personal data, and special categories of personal data listed above in this Policy.

We may process all of the above-cited Personal Data, share it, and under certain state law definitions, our sharing could be considered a “sale” of personal data. However, Beghou does not sell or share your Personal Data in exchange for monetary compensation.

We collect and share Personal Data with our social media, advertising, advertising networks and data analytics business vendors, affiliates and related businesses for purposes of targeted advertising and general marketing.

You may have certain rights under your state law to request the following:

- Right to Access: You may have the right to request a copy of all personal data that we have collected, stored and processed.
- Right to Delete: You may have a right to request that we delete your personal information in accordance with applicable state law.
- Right to Correct: You may have a right to correct any inaccurate personal information that we possess about you.
- Right to Opt-Out: You may have a right to opt-out of processing of the sharing and selling of your personal data for purposes of targeted and behavioral advertising.

To exercise any of the above rights that you may have under your state laws, please contact us at the following:

The interactive form at <https://beghou.com/disable-tracking/> or

Email at [privacy@beghou.com](mailto:privacy@beghou.com).

Tel. No.: (847) 864-5480

Additionally, you may contact us toll free at: 1 (833) 793-9429

We are obligated to verify any requests you make regarding your Personal Data to ensure that we are following state law, protecting your personal interests and protecting Beghou’s interests. You may be asked to provide certain categories of information for us to perform this validation, and we will attempt to not collect any personal data categories beyond what we have already collected from you to verify that you are the person you are purporting to be to exercise the above rights.

Depending on your state’s privacy laws, you may be entitled to make these requests through an authorized agent. We will verify the authority of that authorized agent to protect your interests.

We may deny certain requests, pursuant to applicable state law, in part or in full in certain situations depending on the individual circumstances. To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request.

## **UK Data Protection Act**

Note that the EU General Data Protection Regulation provisions set forth below in this Policy also apply to our UK based customers.

## **EU General Data Protection Regulation**

This section of the Privacy Policy applies if you are a customer in the European Union ( EU). For these purposes, reference to the EU also includes the European Economic Area countries of Iceland, Liechtenstein and Norway and, to the extent applicable, Switzerland. To the extent that provisions in this section contradict other provisions of this Privacy Policy, the provisions in this Section prevail for EU residents.

In compliance with the EU General Data Protection Regulation, Beghou **[Insert Name of Data Protection Representative, if any]** in the EU so that you can contact them directly in your home country.