



ICE Global Consulting, Inc. - Privacy Policy

This privacy policy will explain how ICE Global Consulting Inc. (the “Company”) uses the personal data we collect from you when you use our website. BY USING THIS WEBSITE, YOU CONSENT TO THE COLLECTION AND USE OF THE INFORMATION AS SET FORTH IN THIS PRIVACY POLICY.

What Data Do We Collect?

Our Company collects the following data:

- Contact information (Name, email address, phone number, title provided by user using the “Contact Us” option).
- General (City or State) physical location but no specific address.
- Anonymous browsing history, search history, information on a consumer’s interaction with our website.

How do we collect your data?

You directly provide our company with all/most of the data we collect We collect data and process data when you:

- Register online or place an order for any of our services.
- Voluntarily complete our Contact Us form or via email.

Our Company may also receive general, anonymous data indirectly from the following sources:

- Google Analytics

How will we use your data?

Our Company collects your data so that we can:

- Process your order, manage your account.
- Email you about the services you are looking to purchase or have contracted for.

How do we store your data?

Our Company securely stores your data using Google Analytics.

What are your data protection rights?

Our Company would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

- **The right to access** – You have the right to request our Company for copies of your personal data.
- **The right to rectification** – You have the right to request that our Company correct any information you believe is inaccurate. You also have the right to request our Company to complete information you believe is incomplete.
- **The right to erasure** – You have the right to request that our Company erase your personal data, under certain conditions.
- **The right to restrict processing** -You have the right to request that our Company restrict the processing of your personal data, under certain conditions.
- **The right to object to processing** – You have the right to object to our Company’s processing of your personal data, under certain conditions.
- **The right to data portability** – You have the right to request that our Company transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email:

privacy@ICEGlobalConsulting.com

Privacy Policy of Third Parties

This privacy policy only addresses the collection, processing and use of data or information by our Company. This privacy policy does not apply to any third-party websites that you may access using links contained on this website. If you access any of such third-party website, you should read their applicable privacy policies, as they may be different than ours.

Information regarding Children:

Our Company does not knowingly collect or solicit personal information from individuals under the age of 13. If we learn that we have collected personal information from an individual under the age of 13, we will delete that information without undue delay.

Changes to our privacy policy

Our Company keeps its privacy policy under regular review and places any updates on this web page. Our Company does not notify you if and when we update or make any revisions to our privacy policy. This privacy policy was last updated on 03/23/2021.

Security Policies

Our Company has in place a security program that includes technical, administrative, procedural and physical controls that are designed to reasonably safeguard your personal information from unlawful use and/or unauthorized disclosure. However, no security program measures or controls are 100% effective. Our Company does not make any representations as to the controls we use

to safeguard your personal information and does not guarantee the security of your personal information that is transmitted through the internet.

How to contact us

If you have any questions about our Company’s privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

Email us at: privacy@ICEGlobalConsulting.com

SUPPLEMENTAL NOTICE FOR CALIFORNIA RESIDENTS:

If you are a Resident of California, the following policy applies:

This **PRIVACY NOTICE IS FOR CALIFORNIA RESIDENTS** and applies solely to visitors, users, and others who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice.

Information We Collect

Except for specific contact information you submit via email or using our “Contact Us” option, we do not collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). In particular, we have only collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.	NO
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	NO
C. Protected classification	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex	NO

characteristics under California or federal law.	(including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Anonymous consumer's interaction with our website.	YES
G. Geolocation data.	General (City or State) physical location but no specific address.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

We obtain the categories of personal information listed above from the following categories of sources:

- Directly and indirectly from activity on our website. For example, from submissions through our website portal or website usage details collected automatically.

Use of Personal Information

We may use or disclose the personal information you submit to us for one or more of the following business purposes:

- Process your order, manage your account.
- Email you about the services you are looking to purchase or have contracted for.

We will not collect additional categories of personal information or use the personal information we collect for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

We do not share your information.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose: None.

In the preceding twelve (12) months, we have not sold any personal information.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).

- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. 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, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
6. 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.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, Deletion, and Opt-out Rights

To exercise the access, portability, deletion, or opt-out rights described above, please submit a verifiable consumer request to us by email at: privacy@ICEGlobalConsulting.com

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person or an authorized representative of the person we collected personal information on.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

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.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will notify you by email or through a notice on our website homepage.

Contact Information

If you have any questions or comments about this notice, our Privacy Statement, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at: privacy@ICEGlobalConsulting.com