

**i-fact@analysis, Inc. EU-US and SWISS-US Data Privacy
Framework Policy**

i-fact@analysis, Inc. (“i-fact@analysis”, “IFA”) complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. i-fact@analysis, Inc. has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union and the United Kingdom in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF. i-fact@analysis, Inc. has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit the following link <https://www.dataprivacyframework.gov/>.

i-fact@analysis, Inc. adheres to the EU-U.S. DPF Principles with regard to personal data transferred from the European Union and the United Kingdom and the Swiss-U.S. DPF Principles with regard to personal data transferred from Switzerland.

i-fact@analysis, Inc. commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner’s Office (ICO) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of human resources data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF in the context of the employment relationship.

i-fact@analysis, Inc.’s (IFA) EU and EEA Data Protection Policy refers to our commitment to treat the information of employees, clients, stakeholders and other interested parties with the utmost care and confidentiality. With this policy, we ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights.

This Privacy Policy describes the types of information we collect, how we use the information, how we store the information, how we share or disclose the information, as well as the possibilities regarding the use and processing of the information. The terms of engagement contracts and/or agreements will govern the purpose or means for which this personal data is processed and utilized, as the “data controller.”

We will comply with all applicable data protection laws, including the General Data Protection Regulation 2016/679 and the UK General Data Protection Regulation (DPA).

IFA for the purposes of this document and contractual agreements with clients the following terms "Controller", "Process", "Processor", and “Personal Data” will have the meanings as given to them in any applicable legislation or regulation that relates to data protection, privacy, the use of information relating to individuals to which IFA is subject, including, without limitation, the General Data Protection Regulation (EU) 2016/679 (the “GDPR”), and any relevant national laws implementing the same, all as amended, replaced or superseded from time to time (the “Applicable Data Protection Laws”) or their equivalent terms used under Applicable Data Protection Laws.

IFA will not communicate, disclose, or make available all or any part of the personal information to any third party without the client and/or owner’s written consent except to IFA's Representatives who: (i) need to know the personal information to assist IFA, or act on its behalf, in relation to a client engagement; (ii) are informed by IFA of the confidential nature of the personal information; and (iii) are subject to confidentiality duties or obligations to IFA that are no less restrictive than IFA’s data protection policy.

IFA is committed to assisting its clients in its role as a service provider, Customers are still ultimately responsible for adhering to their obligations as a “data controller.” IFA is responsible for:

- Properly and legally collecting, processing, and transmitting personal data from the U.S., EU, and other countries’ subjects.
- Properly handling requests from EU/ data subjects, such as erasure and access.

Personal data means any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors

specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Purpose of Data Processing:

i-fact@analysis processes personal data for the purpose of providing client services. Personal Data relating to clients is collected from clients who provide it to us in connection with our provision of services to those clients. Client data is processed in the normal conduct of our business relationship with the client, to perform the services requested by and contracted with our clients.

This Privacy Policy explains but is not limited to the following:

What personal data we may collect about you or your company.

- Our processing is lawful.
- Who we may share your information with.
- How we will use the information.
- Who we may provide that information to.
- Your rights regarding the information.

The type of information do we collect.

We gather personal information if and to the extent it is necessary to provide our services to the client under applicable law.

How we collect information.

Information submitted or provided by you and the client.

We collect publicly available information (Open Source) to the extent legally permitted under applicable law and permitted purposes under contractual terms agreed upon with our clients.

The data we collect will be:

- Accurate and kept up to date.
- Collected fairly and for lawful and client permitted purposes.
- Processed by IFA within its legal and moral boundaries.
- Protected against any unauthorized or illegal access by internal or external parties.

The information/Data IFA collects will not be:

Communicated informally.

Transferred to organizations, states or countries that do not have adequate data protection policies.

Distributed to any party other than the ones agreed upon by the client and data's owner.

In addition, IFA may disclose personal information to the extent we are required to do so by law (which may include to government bodies and law enforcement agencies); in connection with any legal proceedings or prospective legal proceedings; and in order to establish, exercise or defend our legal rights.

IFA legally gathers current and historical personal information/data.

The data collected about individuals may include:

- Full Name
- Personal Identification Number
- Passport Number & Photocopy
- Date of Birth
- Residential Address
- Employer
- Name of Spouse, Partner or Significant Other
- Employment History
- Educational History
- Civil Litigation
- Criminal Records
- Biographical Information
- Public/Open-Source Information contained on social media platforms, blogs, chatrooms, media articles, and other forms of online information

Disclosure/Sharing of Personal Data:

We only share your personal data with your consent or in accordance with this policy. We will not otherwise share, sell or distribute any of the information you provide to us except as described in this Privacy Notice.

- We share personal data among i-fact@analysis affiliates and third parties who act for i-fact@analysis for the purposes set out in this notice.

- i-fact@analysis, Inc. may share your information with external third parties, such as vendors, consultants and other service providers who are performing certain services on behalf of i-fact@analysis. Such third parties have access to personal data solely for the purposes of performing the services specified in the applicable service contract, and not for any other purpose. i-fact@analysis requires these third parties to undertake security measures consistent with the protections specified in this notice.
- i-fact@analysis may be required to disclose personal data in response to lawful requests by public authorities, including meeting national security or law enforcement requirements.

Your Rights / Personal Data:

Depending on the laws of the jurisdiction governing the processing of your personal data, you may have certain rights under applicable data protection laws including:

- Access: You have the right to access personal information that i-fact@analysis holds about you. Individuals for whom i-fact@analysis may process Personal Data are entitled to obtain confirmation of whether his/her Personal Data are being processed, access the information held, and ask us to correct, amend, or delete that information where it is inaccurate or has been processed in violation of the laws.
- Rectification: You have the right to ask us to rectify information i-fact@analysis holds about you if it is inaccurate or not complete.
- Erasure: You can request that i-fact@analysis erase your personal data. We will keep basic data to identify you and retain it solely for preventing further unwanted processing.
- Restrict Processing: You have the right to ask i-fact@analysis to restrict how we process your data. This means we are permitted to store the data but not further process it. We keep just enough data to make sure we respect your request in the future.
- Object to processing: Where processing is based on legitimate interests, you have the right to object to i-fact@analysis processing your data. i-fact@analysis will discontinue processing your data, unless we can demonstrate compelling legitimate grounds for the processing. We will keep basic data to identify you and retain it solely for preventing further unwanted processing.

- Portability: Where processing is based on consent or performance of a contract, you have the right to data portability. i-fact@analysis must allow you to obtain and reuse your personal data for your own purposes in a safe and secure way without affecting the usability of your data. This right only applies to personal data that you have provided to i-fact@analysis as the Data Controller.

How long do we retain Personal Information:

IFA will retain “Personal Information” for the period necessary to fulfill the purposes for which it was collected and as required for business or legal purposes unless a longer retention period is required or permitted by law.

Security:

Personal information is treated as strictly confidential, and IFA has taken appropriate technical and organizational security measures against loss, unlawful access and processing of such information.

IFA is a company that works in the risk management, investigation, compliance, and due diligence field; therefore, highly values system security and data safeguards. Our systems require identity assurance, visible trust, and strong protection and therefore IFA’s security policies include data encryption, firewalls, malware protection, intrusion detection, safe data storing, SSL security certificates and reliable web hosting.

i-fact@analysis adheres to the DPF Principles of notice, choice, accountability for onward transfer, third parties, security, data integrity and purpose limitation, access, and recourse, enforcement, and liability with respect to all personal data received from the EU, UK, or Switzerland in reliance on the DPF. i-fact@analysis is subject to the investigatory and enforcement powers of the US Federal Trade Commission (FTC), which has jurisdiction over i-fact@analysis’ compliance with this Policy and the DPF.

Enforcement and Dispute Resolution:

Individuals are encouraged to make any complaints regarding the processing of personal data to i-fact@analysis.

In compliance with EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, i-fact@analysis commits to cooperate and comply with the advice of the panel established by the EU data protection authorities (DPAs), the UK Information Commissioner's Office (ICO), the Gibraltar Regulatory Authority (GRA), and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of personal data received in reliance EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF.

Data subjects may contact the relevant independent recourse mechanism listed below:

- EU Data Protection Authorities (DPAs)
- Swiss Federal Data Protection and Information Commissioner
- UK Information Commissioner's Office

i-fact@analysis will cooperate with the applicable data protection authority in the investigation and resolution of complaints brought under the DPF. i-fact@analysis will comply with any advice given by the EU DPAs, the FDPIC, or the ICO where the applicable authority takes the view that the organization needs to take specific action to comply with the DPF Principles, including remedial or compensatory measures for the benefit of individuals affected by any non-compliance with the principles, and will provide the applicable authority with written confirmation that such action has been taken.

If a dispute or complaint cannot be resolved by i-fact@analysis nor by the EU Data Protection authorities, the Swiss FDPIC, or the UK ICO, a data subject has the right to require that i-fact@analysis enter into binding arbitration pursuant to the DPF's Recourse, Enforcement and Liability Principle and Annex I of the DPF.

Approved By: R. Delia, Managing Partner / Updated: July 18, 2024

Ronald DeLia
