



HAUGEN PERFORMANCE CONSULTING

Privacy Policy

Scope of This Policy

Haugen Performance Consulting, PLLC ("HPC", "we", "our", "us") is the owner of the following websites: www.haugenperformance.com and www.nodakmhfa.com ("Websites").

This privacy policy describes the treatment of information provided or collected on and through our websites and applications (collectively "Sites") where this privacy policy is posted. We follow this privacy policy in accordance with applicable law in the places where we operate.

You may engage with some services (i.e., DocSpace, Teachable) as part of our services, such as when you make a payment and DocSpace provides the payment processing services to us through [DocSpace Pay](#) or through [Teachable](#) (collectively, we refer to Sites and direct and indirect services as "Services").

Please keep in mind that when you provide information to us on a third-party site or platform (for example, via credit card vendor or an application platform), the information you provide may be separately collected by the third-party site or platform. The information we collect is covered by this privacy policy, and the information the third-party site or platform collects is subject to the third-party site or platform's privacy practices. Privacy choices you have made on the third-party site or platform will not apply to our use of the information we have collected directly through our Website. Please also keep in mind that our Site or communications contains links to other sites or applications not owned or controlled by us and we are not responsible for the privacy practices of those sites. We encourage you to be aware when you leave our Sites or applications and to read the privacy policies of other sites that may collect your Personal Data.

Types of Information We Collect

We collect personal information, and we may use personal information to create a separate type of information, aggregate information which removes your identity and allows us to create statistical data.

For example, we collect data such as:

- Registration information you provide when you create an account on our portal, such as your first name and surname, location of residence, gender, date of birth, email address, username, and password;
- Transaction information you provide when you purchase a product or service from us, such as your postal address, telephone number, and payment information;
- Information we obtain from a third party, such as a site or platform provider, about use of our applications on third-party platforms or devices.

- When you fill-in our online form to contact our team or use any chat bot on our Sites, we ask for your name, contact information, country, and other information about your interest in our Services.
- When you authorize us to store information about you in connection with our payment portals, we collect your name and contact information and information about your stored payment methods (e.g. payment card number, CVC code and expiration date).
- When you submit your identification card for purposes of verification.
- When you respond to HPC emails, surveys, or sign up for our mailing list, we collect your email address, name and any other information you choose to include in the body of your email or responses. If you contact us by phone, we will collect the phone number you use to call HPC, as well as other information you may provide during the call. If you are a HPC User or Customer, when you contact us, we may collect additional information in order to verify your identity.
- If you are a HPC User, you may provide your contact details, such as name, postal address, telephone number, and email address. If you are a contractor with HPC, as part of your business relationship with us, we may also collect financial and personal information about you, such as your date of birth and government identifiers associated with you and your organization (such as your social security number, tax number, or Employer Identification Number). You may also choose to provide bank account information.
- If you are a Customer, when you make payments to, or transact with a User through HPC'S Services or a HPC provided device, we will receive your transaction information. If you are transacting directly with HPC, we receive the information directly from you. If you are transacting with a User, depending on how they integrated our Services, we may receive this information directly from you, from the HPC User or third parties. The information that we collect may include payment method information (such as credit or debit card number, or bank account information), purchase amount, date of purchase, and in some cases, some information about your purchases. Different payment methods may require the collection of different categories of information. The payment method information that we collect will depend upon the payment method that you choose to use from the list of available payment methods that are offered to you at the time of check-out. We may also receive your name, email, billing, or shipping address and in some cases, your transaction history to authenticate you.

In connection with fraud monitoring, prevention, detection, and compliance activities for HPC and its users, we receive identity related from the following sources:

- From Customers (including through their devices [e.g., IP Addresses]) related to Customers.
- From Users about themselves and their Customers, including as collected through our Services.
- From our business partners, financial service providers, identity verification services, and publicly available sources.

This Personal Data (e.g., name, address, phone number, country) helps us to confirm identities and prevent fraud. We may also use technology to assess the fraud risk associated with an attempted transaction by a Customer with a HPC user.

You may also choose to submit information to us via other methods, including: (i) in response to marketing or other communications, (ii) through social media or online forums, (iii) through participation in an offer, program or promotion, (iv) in connection with an actual or potential business relationship with us, or (v) by giving us your business card, business information or

contact details in connection with trade shows or other events, including online webinars and programs through video communication platforms.

Our Sites use cookies and other technologies. These technologies record information about you, including:

- Browser and device data, such as IP Address, device type, operating system and Internet browser type, screen resolution, operating system name and version, device manufacturer and model, language, plug-ins, add-ons, and the language version of the Sites you are visiting.
- Usage data, such as time spent on the Sites, pages visited, links clicked, language preferences, and the pages that led or referred you to our Sites.
- Online activities. We collect information about your online activities on Websites and connected devices over time and across third-party Websites, devices, apps, and other online services.
- We collect information when you engage with our marketing messages and when you click on links included in ads for our products. We use Google Analytics on our Sites to help us analyze your use of our Sites and diagnose technical issues.

How We Collect Your Information

We use Personal Data to facilitate the business relationships we have with our Users, to comply with our financial regulatory and other legal obligations, and to pursue our legitimate business interests. We also use Personal Data to complete transactions and to provide payment-related services to our Users.

We collect information you provide to us when you purchase products or services, register with us, or otherwise interact with us using one or more devices. You may provide information to us in a variety of ways, including by typing or speaking.

We collect information through a variety of technologies, such as application program interfaces, and Web beacons, including when you visit our Sites.

We use Personal Data for the purpose of entering into business relationships with prospective HPC Users or Clients, and to perform the contractual obligations under the contracts that we have with HPC Users. Activities include:

- Creation and management of HPC accounts and HPC account credentials, including the evaluation of applications to commence or expand the use of our Services;
- Creation and management of payment accounts;
- Accounting, auditing, and billing activities; and
- Processing of payments, including fraud detection and prevention, optimizing valid transactions, communications regarding such payments, and related customer service.

Legal and Regulatory Compliance

We use Personal Data to verify the identity of our Users to comply with fraud monitoring, prevention and detection obligations, laws associated with the identification and reporting of

illegal and illicit activity, such as AML (Anti-Money Laundering) and KYC (Know-Your-Customer) obligations, and financial reporting obligations. For example, we may be required to record and verify a User's identity for the purpose of compliance with legislation intended to prevent money laundering and financial crimes. These obligations are imposed on us by the operation of law, industry standards, and by our financial partners, and may require us to report our compliance to third parties, and to submit to third party verification audits.

Legitimate Business Interests

As allowed, under applicable law, we rely on our legitimate business interests to process Personal Data about you. When we do so, we balance our legitimate interests against the interests and rights of the individuals whose Personal Data we process. The following list sets out the business purposes that we identified as legitimate:

- Detect, monitor and prevent fraud and unauthorized payment transactions;
- Mitigate financial loss, claims, liabilities or other harm to Customers, Users, and HPC;
- Determine eligibility for and offer new HPC products and services;
- Respond to inquiries, send Service notices, and provide customer support;
- Promote, analyze, modify, and improve our Services, systems, and tools, and develop new products and services, including reliability of the Services;
- Manage, operate and improve the performance of our Sites and Services by understanding their effectiveness and optimizing our digital assets;
- Analyze and advertise our Services;
- Conduct aggregate analysis and develop business intelligence that enable us to operate, protect, make informed decisions, and report on the performance of, our business;
- Share Personal Data with third party service providers that provide services on our behalf and business partners which help us operate and improve our business ([Learn More](#));
- Enable network and information security throughout HPC and our Services; and
- Share Personal Data among our affiliates for administrative purposes.

Payment transactions and related services (incl. DocSpace and Teachable as data processors)

We use Personal Data of Customers to provide our Services to Users, including to process online payment transactions and authenticate Customers on behalf of our Users (DocSpace Pay: [Learn More](#); Teachable: [Learn More](#)). All such use is pursuant to the terms of our business relationships with our Users. In addition, we may offer payment-related services to Users who have requested such services, and our delivery of such related services to our Users may involve the use of Personal Data. For example, a HPC User may specify parameters for transactions submitted by its Customers that determine whether the transactions are blocked or allowed by our payment processing Services. In such cases, the User is responsible for the collection and use of Customer's Personal Data for the payment transactions and payment-related services. We also use Personal Data to detect and prevent fraud. In providing such services, we may provide Users who have requested such services Personal Data from a Customer to assess the fraud risk associated with an attempted transaction by their Customer.

Marketing and events-related communications

We may send you email marketing communications about HPC products and services, invite you to participate in our events or surveys, or otherwise communicate with you for marketing purposes, provided that we do so in accordance with applicable law, including any consent requirements. For example, when you submit your contact information to us or when we collect

your business contact details through our participation at trade shows or other events, we may use the information to follow-up with you regarding an event, send you information that you have requested on our products and services and, with your permission, include you on our marketing information campaigns.

Advertising

When you visit our Sites, we (and our service providers) may use Personal Data collected from you and your device to target advertisements for HPC Services to you on our Sites and other sites you visit (“interest-based advertising”), where allowed by applicable law, including any consent requirements. For example, when you visit our Site, we will use cookies to identify your device and direct ads for our Services to you. You have choices and control over our cookies (or similar technologies) we use to advertise to you. Please see this [Cookie Policy](#) for more information. At present, there is no industry standard for recognizing Do Not Track browser signals, so we do not respond to them.

We do not use, share, rent or sell the Personal Data of our Users’ Customers for interest-based advertising. We do not sell or rent the Personal Data of our Users, their Customers, or our Site Visitors.

Sharing Your Information with Other Entities

HPC does not sell or rent Personal Data to marketers or unaffiliated third parties. We share your Personal Data with trusted entities, as outlined below.

Your information may, at your direction, be shared with other Users on our Sites, such as any other information or content that you provide on the Site that may be used and/or disseminated in accordance with our Terms of Use policy. We will not share your Personal Information with a third party, except as required or permitted by law, and any Personal Health Information will not be shared with a third party.

Please note that once we share your personal information with another company, the information received by the other company is controlled by that company and becomes subject to the other company’s privacy practices.

When companies perform services on our behalf, like package delivery, marketing and advertising, and customer service, they may receive your personal information; however, these companies are prohibited from using your personal information for purposes other than those requested by us or required by law.

Business Partners

We share Personal Data with third party business partners in connection with our Services to our Users. Examples of third parties to whom we may disclose Personal Data for this purpose are banks and payment method providers (such as credit card networks) when we provide payment processing services.

Corporate Transactions

In the event that we enter into, or intend to enter into, a transaction that alters the structure of our business, such as a reorganization, merger, sale, joint venture, assignment, transfer, change

of control, or other disposition of all or any portion of our business, assets or stock, we may share Personal Data with third parties in connection with such transaction. Any other entity which buys us or part of our business will have the right to continue to use your Personal Data, but subject to the terms of this Privacy Policy.

Compliance and Harm Prevention

We share Personal Data as we believe necessary: (i) to comply with applicable law, or rules imposed by payment method in connection with use of that payment method; (ii) to enforce our contractual rights; (iii) to protect the Services, rights, privacy, safety, and property of HPC, you or others; and (iv) to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include authorities outside your country of residence.

Your Controls and Choices

We provide you the ability to exercise certain controls and choices regarding our collection, use and sharing of your information. You may contact us to exercise these options by sending an email to hello@haugenperformance.com In accordance with applicable law, your controls and choices may include:

- Correcting, updating, and deleting your Registration Information
- Requesting access to the personal information we hold about you
- If you no longer want to receive marketing-related emails from us, you may opt-out via the unsubscribe link included in such emails. We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt-out of receiving marketing-related emails from us, we may still send you other messages in connection with providing our Services.

Please be aware that collection of certain personal information is mandatory because of the service we provide, but we will make that clear at the point of collection so that you can make an informed decision whether to participate. If you have questions about the specific personal information about you that we process or retain, and your rights regarding that personal information, contact by email at hello@haugenperformance.com

Privacy of Minors

The Services are not directed to minors, including children under the age of 18, and we request that they not provide Personal Data through the Services. In some countries, we may impose higher age limits as required by applicable law. We do not sell any Personal Data of Customers, Visitors or Users, including those aged between 13 to 16.

We recognize the need to provide further privacy protections with respect to personal information we may collect from minors as it relates to this Site. Minors are expressly prohibited from using this Site.

Data Security

The security, integrity, and confidentiality of your information are extremely important to us. We have implemented technical, administrative, and physical safeguards that are designed to protect information from unauthorized access, disclosure, use, and modification. We regularly

review our security procedures to consider appropriate technology and methods as appropriate, or as required by law. Please be aware that, despite our best efforts, no security measures are perfect. If you believe that your information has been compromised, contact us immediately by email at hello@haugenperformance.com.

We retain your Personal Data as long as we are providing the Services to you or our Users (as applicable). Even after we stop providing Services directly or indirectly to you, and even if you close your HPC account or complete a transaction with HPC, we keep your Personal Data to comply with our legal and regulatory obligations. We may also keep it to assist with our fraud monitoring, detection, and prevention activities. We also keep Personal Data to comply with our tax, accounting, and financial reporting obligations, where we are required to retain the data by our contractual commitments to our financial partners, and where data retention is mandated by the payment methods you used. In all cases where we keep data, we do so in accordance with any limitation periods and records retention obligations that are imposed by applicable law.

Changes to This Privacy Policy

From time to time, we may change this privacy policy to accommodate new technologies, industry practices, regulatory requirements or for other purposes. We will provide notice to you if these changes are material and, where required by applicable law, we will obtain your consent. Notice may be by email to you at the last email address you provided us, by posting notice of such changes on our Sites and applications, or by other means, consistent with applicable law.

We may provide you with disclosures and alerts regarding the Privacy Policy or Personal Data collected by posting them on our Website and, if you are a User, by contacting you through your HPC dashboard, email address, and/or the physical address listed in your HPC account.

If applicable law requires that we obtain your consent or provide notice in a specified manner prior to making any changes to this Privacy Policy applicable to you, we will provide such required notice and will obtain your required consent.

California

If you are a consumer located in California, we process your personal data in accordance with the California Consumer Privacy Act (CCPA). This section provides additional details about the personal information we collect and use for purposes of CCPA.

How We Collect, Use, and Disclose your Personal Information

The [Personal Data We Collect](#) section describes the personal information we may have collected about you, including the categories of sources of that information. We collect this information for the purposes described in the [How We Use Personal Data](#) section. We share this information as described in the [How We Disclose Personal Data](#) section. HPC uses cookies, including advertising cookies, as described in our [Cookie Policy](#).

Your CCPA Rights and Choices

As a California consumer and subject to certain limitations under the CCPA, you have choices regarding our use and disclosure of your personal information:

Exercising the right to know: You may request the following information about the personal information we have collected about you:

- The categories and specific pieces of personal information we have collected about you;
- The categories of sources from which we collected the personal information;
- The business or commercial purpose for which we collected the personal information;
- The categories of third parties with whom we shared the personal information; and
- The categories of personal information about you that we disclosed for a business purpose, and the categories of third parties to whom we disclosed that information for a business purpose.

Exercising the right to delete: You may request that we delete the personal information we have collected from you, subject to certain limitations under applicable law.

Exercising the right to opt-out from a sale: You may request to opt out of any “sale” of your personal information that may take place. As described in [Advertising](#), we do not use, share, rent or sell the Personal Data of our Users’ Customers for interest-based advertising. We do not sell or rent the Personal Data of our Users, their Customers or our Site visitors.

Non-discrimination: The CCPA provides that you may not be discriminated against for exercising these rights.

To submit a request to exercise any of the rights described above, contact us at hello@haugenperformance.com.

ALL

When exercising your rights, we may need to verify your identity before responding to your request, such as verifying that the email address from which you send the request matches your email address that we have on file. Authentication based on a government-issued and valid identification document may be required.

Comments and Questions

If you have a comment or question about this privacy policy, please contact us by email at hello@haugenperformance.com

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