

## PRIVACY STATEMENT

Policy last updated on: May 15<sup>th</sup>, 2022

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### Introduction

As privacy is of great importance for our company and to our clients, Gorman Consulting provides this Privacy Policy 1) to inform you about our information practices, the types of information we may collect, process, store or share that information, and 2) so you can exercise your rights regarding that information.

Gorman Consulting may modify this Privacy Policy from time to time to reflect changes in our practices. The most recent version of the policy can be found on our website.

#### [About Gorman Consulting](#)

Gorman Consulting is a company that provides specialized measurement and evaluation services, primarily in the health sector. We help our clients measure, manage, and interpret results – all to ensure data are appropriately used to assess and iteratively improve programming. We pride ourselves in balancing academic rigor with programmatic priorities while being explicit about biases and limitations.

## Contact

Website: <https://gormanconsulting.org/>

Company's address: 707 Driftwood Lane, WA 98020 Edmonds

Data controller: [trina@gormanconsulting.org](mailto:trina@gormanconsulting.org)

Data protection officer: [koen@gormanconsulting.org](mailto:koen@gormanconsulting.org)

## To whom does this policy apply?

This privacy statement applies to persons who:

- Visit and use the Gorman Consulting website
- Communicate with Gorman Consulting.
- Apply for positions at Gorman Consulting
- Are employed (staff and consultants) at Gorman Consulting.

## What does this policy cover?

This Privacy Policy applies to personal data that Gorman Consulting collects from you when: you visit our website; have communications with/from us (including emails, phone calls or texts); submit a job application; submit information to us in connection with a potential business relationship with us or otherwise interact with us. Below, "you" refers to any individual who Gorman Consulting staff may come into contact with through any of these means. In general, with respect to the personal data we collect directly from the website or other services, Gorman Consulting is a data controller. This means that as a data controller we determine the purposes for which, and the manner in which, the personal data we collect is to be processed.

This Privacy Policy does not apply to our security and privacy practices concerning the personal data we receive and process on behalf of our clients. In this capacity, we are acting in the role of a data processor on behalf of our clients, and our security and privacy commitments are detailed in and governed by our agreements with them. Gorman Consulting does not have control over and is not responsible for the data practices of our clients. For more information about security and privacy practices of our clients we encourage you to review their Privacy Policies.

## How does Gorman Consulting Process Your Personal Data?

The following table summarizes the purposes for which Gorman Consulting processes personal data collected directly from you, and for each purpose, what data are collected and the legal basis. Consulting does not store personal data for longer than is strictly necessary to achieve the purposes for which your data is collected. After the retention periods expires, Gorman Consulting will delete/dispose your data securely.

<b>Data acquired by</b>	<b>Personal Data Collected</b>	<b>Legal Basis</b>	<b>Retention Period</b>
Contact	Gorman Consulting may need to gather and use information about individuals, such as clients, business contacts, employees, the beneficiaries of clients, respondents of interviews, and other people the organization may need to contact. We collect personal data from you categorized as simple data; such as name, email address, phone number and meta data and content of correspondence with you, the data subject.	Data is processed in order to keep relevant parties informed and to respond to any inquiries made by data subjects. The processing of your personal data for this purpose is necessary for the representation of Gorman Consulting legitimate interest.	3 years

Job applications	<p>When applying for a job position at Gorman Consulting, we might collect, process and store an applicant's personal data.</p> <p>We collect personal data from you categorized as simple data; such as personal data originating from a job application (such as name, email address, phone number, physical address, information about applicant's education, language and communication skills) including resume and references.</p>	<p>The data is processed in order to establish an agreement between Gorman Consulting and the job applicant.</p> <p>The processing of your personal data for this purpose is necessary in order to take steps at the request of the data subject prior to entering into the employment contract and for compliance with a legal obligation to which the controller is subject.</p>	3 years
Employment	<p>Gorman Consulting collects personal data concerning their own employees (staff and consultants), partners, managers, directors, officers and agents as part of the administration, management and operation of our business activities. Also, Gorman Consulting processes personal data (e.g. financial data) concerning their own employees as part of administration process when making invoices and for tax purposes.</p> <p>We process personal data from you categorized as simple data; such as employees name, email address, phone number, physical address, data about education, language and communication skills, resume and references; financial data; such as bank account details and transactions with/to employees and consultants; and behavioral data; such as working time tracking data.</p>	<p>Gorman Consulting processes these data in order to execute the agreement with employees and consultants, and in order to meet its legal requirements.</p> <p>The processing of your personal data for this purpose is necessary for the performance of the contract to which you are part and for compliance with a legal obligation to which the controller is subject</p>	10 years
Website	<p>In order to provide professional services, Gorman Consulting process personal data from website visitors.</p> <p>We collect personal data from you categorized as behavioral data; such as visitors IP address, and, where appropriate: data from necessary and/or analytical cookies.</p>	<p>These data are processed for statistical and analytical purposes and to improve and maintain web services.</p> <p>The processing of your personal data for this purpose is necessary for the representation of Gorman Consulting legitimate interest.</p>	1 year

### With whom does Gorman Consulting share Personal data?

We disclose your information to third parties only as necessary to carry out your request, for a variety of our professional or legitimate business purposes, including to provide our services, to protect us or others, or as

otherwise required or permitted by law. We might share your personal data with our service providers such as cloud services for workspace, time tracking and/or file sharing, e-mail and website hosting services, software services for the manipulation, visualization and statistics of data and/or payment providers. These third party service providers may have access to or process your personal data for the purpose of providing these services for us. When we do transfer your personal data to third parties or service providers, appropriate safeguards will be in place in order to ensure correct and secure data processing in compliance with applicable data protection law.

### **How will Data be Processed on Behalf of Gorman's Clients?**

Processing of personal data by Gorman Consulting on behalf of another data controller or client will be governed by a contract or other legal act, that is binding on the processor with regard to the controller and that sets out the subject-matter and duration of the processing, the nature and purpose of the processing, the type of personal data and categories of data subjects, and the obligations and rights of the controller.

For any inquiries relating to data we process on behalf of another data controller, we ask you to submit your request to the appropriate data controller.

### **How is Personal Data Protected?**

To comply with the law, personal data collected by us is always used fairly, stored safely and not disclosed unlawfully. Gorman Consulting takes the protection of your data seriously and takes appropriate technical and organizational measures to prevent misuse, loss, unauthorized access, unwanted disclosure, and unauthorized changes. To ensure our privacy and security policies are in compliance with data protection law, Gorman Consulting has provided agreements that contain provisions and protocols for the processing of sensitive information and personal data. If you have the impression that your data is not properly secured or there are indications of misuse, please contact us at: [trina@gormanconsulting.org](mailto:trina@gormanconsulting.org).

### **What is the Policy Towards Children?**

Our website and/or services do not intend to collect data about website visitors who are younger than 18 years old, unless they have parental or guardian permission. However, we cannot check whether a website visitor or person who contacts us is older than 18. We, therefore, advise parents to be involved in the online activities of their children, in order to prevent data about children from being collected without parental consent.

If you are convinced that we have collected personal information about a minor without permission, please contact us at [trina@gormanconsulting.org](mailto:trina@gormanconsulting.org) and we will delete this information.

### **Automated processing**

Gorman Consulting does not make decisions based on automated processing on matters that can have (significant) consequences for people. This concerns decisions that are taken by computer programs or systems, without involving a person (for example staff or consultants of Gorman Consulting).

### **Does the Website Store Cookies?**

No, Gorman Consulting currently does not process any cookies on its website.

### **For EU/EEA citizens Only**

#### What protocols are used for international data transfers?

We store personal data sent or collected via or by us in the United States. To facilitate our global services, we may transfer, store and access such information from the locations where we operate. For such case, we rely on international transfer mechanisms such as the European Commission approved Standard Contractual Clauses,

adequacy decisions about certain countries, or we will ask you for your prior consent for the transfer of your personal data, as applicable. In addition, we ensure the recipient of your Personal Information has in place adequate levels of protection for your personal data.

What are your rights?

Type	Description
Right of access	You have the right to obtain confirmation from Gorman Consulting about whether or not your personal data is being processed and, if that is the case, to obtain access to that personal data and additional information about the processing of your personal data. Gorman Consulting, therefore, provides you with a copy of your personal data.
Right to rectification	You have the right to obtain rectification of inaccurate or incomplete personal data. If possible, you can provide additional personal data to complete the collection of personal data.
Right to erasure (Right to be forgotten)	Under certain circumstances, you have the right to submit a request to delete your personal data. We will delete your personal data, for example, if your personal data is no longer necessary for the purposes for which it was collected, if you withdraw consent on which the processing is based and there is no other legal basis for the processing, if you object to the processing and your interests outweigh, or if we are legally obliged to delete your personal data.
Right to restriction	In some cases, you have the right to obtain from us the restriction of the processing of your personal data. This means that we will temporarily pause the processing of your personal data, for example, if you have contested the accuracy of your personal data or have objected to the processing of your personal data. If the request is granted, we will not further process the personal data in question during the term of the restriction, unless this is permitted on the basis of the GDPR.
Right to object	You have the right to object to the processing of personal data based on Gorman Consulting's legitimate interests. We will then no longer process the personal data, unless if we demonstrate that there are compelling legitimate grounds for the processing that outweigh your interests, rights, and freedoms or that are related to the institution, exercise, or defense of legal claims.
Data portability	You have the right to receive your personal data that you have provided to us in a structured, commonly used, and machine-readable form and you have the right to forward this data to another controller, where the processing is based on your consent or on an agreement.
Right to withdraw consent	Where the processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. The withdrawal of consent does not affect the lawfulness of the processing before it has been withdrawn.

If you wish to exercise any of these rights listed, we ask you to send your data access request by email, addressed to the data controller at [trina@gormanconsulting.org](mailto:trina@gormanconsulting.org). You will not be charged for the completion of subject access requests. Gorman Consulting will aim to provide you with the relevant data within 30 days. To conform with our strict privacy rules, we will always verify the identity of anyone making a subject access request before handing over any information.

## European Economic Area (EEA) and the UK Residents

If you are located in the European Economic Area (EEA) or the UK, in addition to the rights mentioned above, you also have the right to lodge a complaint with a national supervisory authority in your country if you believe our processing of your personal data violates applicable law.

## **For California Residents Only**

If you are a California resident, there are some rights that may be available to you under the California Consumer Protection Act ("CCPA"). This policy explains the tools that we have made available to you to exercise your data rights under the CCPA, such as the right to deletion and the right to request access to the categories of information we have collected about you. You will not be discriminated against for exercising any of your privacy rights under the CCPA. In order to protect your information from unauthorized access or deletion, we may require you to provide additional information for verification. If we cannot verify your identity, we will not provide or delete your information.

This policy also describes the categories of personal information we may collect, the sources of that information, and our deletion and retention policies. We've also included information about how we may process your information, which includes for "business purposes" under the CCPA - such as to protect against illegal activities, and for the development of new products, features, and technologies.

We don't sell your personal information.

If you have any questions or would like to exercise your rights under the CCPA, you can reach out to us at: [trina@gormanconsulting.org](mailto:trina@gormanconsulting.org).