Privacy Policy

Effective date: May 12, 2025

Company: Heyward Consulting Group ("HCG," "we," "us," or "our")

Contact: info@heywardconsultinggroup.com

We respect your privacy. This Policy explains what we collect, how we use and share it, and the choices you have when you use **heywardconsultinggroup.com** and related pages (the "Site"), contact us, or work with us.

If you are a resident of California or another U.S. state with consumer privacy rights, see **Your U.S. State Privacy Rights** below. If you are in the EEA/UK/Switzerland, see **GDPR Notices**.

1) What we collect

A. Information you provide

- Contact details (name, email, phone, organization, role) when you submit forms or book a meeting.
- Messages and files you send through forms or email.
- **Billing info** (only if we transact through invoices or a payment processor; we do not store full card numbers on the Site).
- Recruiting or vendor submissions (résumés, proposals).

B. Information we collect automatically

- **Usage data** (pages viewed, links clicked, referral URL, approximate location, device/browser).
- Cookies and similar tech to remember preferences and analyze Site performance. See Cookies below.

C. Information from third parties (if enabled)

- Analytics (e.g., Google Analytics) for aggregated usage stats.
- Scheduling (e.g., Calendly) for appointment details you submit.
- Form & site hosting via our website provider (B12).
- **Email & CRM tools** (e.g., [Mailchimp]/[HubSpot]) for communications and lead management.

We do not knowingly collect **sensitive personal information** through the Site (e.g., government IDs, precise geolocation, financial account logins).

2) How we use information

We use information to:

- Respond to inquiries, schedule meetings, and deliver services.
- Operate, secure, and improve the Site and user experience.
- Send service updates, insights, and marketing (you can opt out anytime).
- Analyze Site performance and effectiveness of our content.
- Comply with law, enforce terms, and protect our rights and users.

Healthcare note: We sometimes support projects in healthcare settings (e.g., operations, workflows, screening programs). The **Site** is not intended to collect Protected Health Information ("PHI"). If a project requires handling PHI, we will do so **off-Site** under a separate contract (and a Business Associate Agreement, if applicable).

3) Legal bases (GDPR/EEA visitors)

Where GDPR applies, we rely on: (i) **legitimate interests** (e.g., to run and improve our Site and business), (ii) **contract** (to provide services you request), and (iii) **consent** (for certain cookies/marketing, where required), and (iv) **legal obligation**.

4) How we share information

We may share information with:

- Service providers/Processors who help us run the Site and business (hosting, analytics, scheduling, email/CRM, payment processing). They may only use data to perform services for us.
- **Professional advisors** (e.g., legal, accounting).
- **Business transfers** (e.g., merger, acquisition, financing).
- Legal and safety obligations (to comply with law, enforce terms, or protect rights, security, or property).

We do **not** sell your personal information for money. We also do not enable cross-context behavioral advertising on the Site.

5) Data retention

We keep personal information only as long as needed for the purposes above, to meet legal/accounting requirements, or resolve disputes. Retention periods vary by data type and context.

6) Security

We use reasonable administrative, technical, and physical safeguards appropriate to the nature of the information. No method of transmission or storage is 100% secure. Please use caution when sending information online.

7) Your choices

- **Marketing emails:** Click "unsubscribe" in any message or email us at info@heywardconsultinggroup.com.
- Cookies/analytics: Manage through your browser settings and any cookie banner provided; you can also use Google's opt-out tools if we use Google Analytics.
- Access, correction, deletion: See the U.S. State and GDPR sections below or email us.

8) Cookies & similar technologies

Cookies are small files stored on your device. We may use:

- Essential cookies to enable core Site features.
- Analytics cookies to understand traffic and improve content (e.g., Google Analytics).
- **Preference cookies** to remember settings (e.g., form fields).

You can manage cookies via your browser. Blocking some cookies may affect Site functionality.

9) Third-party links and embedded content

Our Site may link to third-party websites or embed tools (e.g., Calendly). We don't control those sites and aren't responsible for their privacy practices. Review their policies before submitting information.

10) Children's privacy

Our Site is not directed to children under 13, and we don't knowingly collect personal information from them. If you believe a child provided personal information, contact us to request deletion.

11) International transfers

If you access the Site from outside the United States, your information may be processed in the U.S. or other countries where our service providers operate. We take steps to protect your information consistent with this Policy.

12) Your U.S. state privacy rights (including California/CPRA)

Depending on your state (e.g., CA, CO, CT, VA, UT), you may have the right to:

- **Know/Access** the categories and specific pieces of personal information we collected about you.
- **Delete** personal information we collected from you (subject to legal exceptions).
- **Correct** inaccurate personal information.
- **Opt out** of "sales" or "sharing" of personal information (as defined by state law). We do not sell your personal information for money, nor do we "share" it for cross-context behavioral advertising.
- Limit use of sensitive personal information (we do not collect it via the Site).
- Non-discrimination for exercising these rights.

How to exercise your rights:

Email <u>info@heywardconsultinggroup.com</u>) with "Privacy Request" in the subject and specify your state and request. We may need to verify your identity. You may use an authorized agent (subject to verification).

California disclosures:

- Categories of personal information collected: identifiers (e.g., name, email), internet/network activity (usage data), professional information (organization/role), and in some cases commercial info (if you purchase services).
- Sources: directly from you; automatically from your device; and service providers (analytics/scheduling/hosting).
- Business or commercial purposes: as described in **How we use information**.
- Disclosures for a business purpose: to service providers as listed in **How we share** information.
- Retention: as described in **Data retention**.

13) GDPR: EEA/UK/Swiss visitor rights and controller details

Where GDPR applies, you may have the rights to access, rectify, erase, restrict, object, and port your personal data, and to withdraw consent where processing is based on consent.

- Controller: Heyward Consulting Group, Silver Spring, Maryland, USA
- Contact: info@heywardconsultinggroup.com
- EU/UK representative / DPO: (contact us using the details above)

To exercise rights, email us with "GDPR Request" in the subject. You also have the right to lodge a complaint with your local supervisory authority.

14) Do Not Track

Some browsers offer "Do Not Track" signals. We currently do not respond to DNT signals.

15) Changes to this Policy

We may update this Policy from time to time. The "Effective date" above shows when it was last revised. Material changes will be highlighted on this page. Your continued use of the Site after changes means you accept the updated Policy.

16) How to contact us

Questions or requests?

Email & Privacy requests: info@heywardconsultinggroup.com