PRIVACY POLICY FOR BASILE CONSULTING, INC.

Introduction

At Basile Consulting, Inc., we recognize the critical importance of privacy and are committed to maintaining the trust of our clients by protecting personal information with the utmost care and security. This Privacy Policy outlines our practices regarding the collection, use, management, and protection of personal data under our control. The objective of this policy is to ensure transparency in our data handling practices and to comply with applicable privacy and data protection laws.

Our commitment extends to ensuring that our collection, storage, and handling of data are carried out in a manner that respects individual rights and promotes accountability and trust. This document provides an overview of the types of personal information we collect, the purposes for which we collect such information, and how we process it to better serve those who use our services.

ARTICLE 1: Information Collection

1.1 Personal Identification Information:

In the course of delivering tailored IT solutions and services, we collect various types of personal identification information from our clients and prospective clients. This information includes, but is not limited to:

- First and Last Name: To personalize communications and ensure identification.
- Phone Number: For direct communication regarding our services.
- Address: To facilitate the provision of on-site services or correspondence.

- Marital Status: Where necessary, to tailor specific IT solutions that may depend on household needs.
- Email Address: For regular updates, service communication, and marketing purposes.

These pieces of information are essential for us to provide responsive and customized IT service solutions, as well as for administrative, billing, and contact purposes.

1.2 Method of Collection:

We gather personal identification information through various methods, which are designed to ensure the accuracy and relevance of the data:

- Website Forms: Our website features forms that visitors can fill out to inquire about services, request support, or subscribe to our newsletters. This method provides a direct and efficient way to collect accurate and relevant information from users.
- Client Interactions: Personal information may also be collected through direct interactions with clients, whether in person during meetings or service visits, or virtually via phone calls and digital communications. This allows us to maintain a detailed client profile that supports customized service delivery.

ARTICLE 2: Use of Information

2.1 Purposes of Information Use:

Basile Consulting, Inc. collects and uses personal information to enhance the delivery and efficiency of our IT services. Specifically, the information is utilized for the following purposes:

• Marketing Communications: We use contact details such as email addresses, phone numbers, and postal addresses to send informational and promotional materials about

new products, special offers, and other services we believe will be of interest to our clients.

- Service Management and Customization: Personal information assists us in tailoring our services to meet the specific needs of our clients, enhancing the overall effectiveness and satisfaction with our IT solutions.
- **Client Support:** Contact information is critical for effective communication during service setup, troubleshooting, and regular service updates.

2.2 Client Benefits from Information Use:

Utilizing personal information as described above enables Basile Consulting, Inc. to provide a more personalized and efficient service experience. Clients benefit from:

- **Customized Solutions:** Information like marital status and specific IT needs allows us to offer personalized advice and configurations that align closely with individual or business requirements.
- **Timely and Relevant Offers:** By understanding client preferences and service histories, we can deliver tailored marketing that aligns with the interests and needs of our clients, potentially providing cost savings and enhanced service offerings.
- Efficient Communication: Reliable contact information ensures that clients receive timely support and information critical to the management of their IT infrastructure.

2.3 Consent for Communication:

• **Obtaining Consent**: Basile Consulting, Inc. will obtain explicit consent from clients and users before sending promotional or marketing communications via email or SMS. Users



will have the opportunity to give their consent through clear and affirmative actions, such as ticking a checkbox on a web form that specifies the type of communications they wish to receive.

- Scope of Consent: Consent specifically covers the receipt of updates, marketing messages, and promotional offers from Basile Consulting, Inc. through selected communication channels, including email and SMS.
- Withdrawal of Consent: Users can withdraw their consent at any time by clicking on the unsubscribe link provided in all our marketing emails or by contacting us directly through the methods specified in the Privacy Policy. Upon withdrawal, Basile Consulting, Inc. will cease to send promotional messages to the user without undue delay.

ARTICLE 3: Information Sharing and Disclosure

3.1 Conditions for Information Sharing:

While Basile Consulting, Inc. holds client privacy in the highest regard, there are circumstances under which personal information might be shared with third parties. These include:

• Service Providers: We engage other companies and individuals to perform functions on our behalf. Examples include hosting our web servers, analyzing data, providing marketing assistance, and providing customer service. These service providers have access to personal information needed to perform their functions but may not use it for other purposes.

• Legal Requirements: We may disclose personal information when required to do so by law, such as in response to a subpoena or similar legal process, or to protect against fraud or security issues.

3.2 Assurance Against Selling or Renting Information:

Basile Consulting, Inc. guarantees that it will not sell, rent, or lease client personal information to third parties. All sharing of information is conducted strictly within the confines of the purposes outlined in this policy and is governed by our commitment to maintaining the privacy and integrity of client data.

ARTICLE 4: Data Security

4.1 Security Measures:

Basile Consulting, Inc. is committed to protecting the security of your personal information. We implement various security technologies and measures designed to protect your data from unauthorized access, use, or disclosure. These measures include, but are not limited to:

- Encryption: Sensitive data, such as transaction information and personal details, is encrypted during transmission over the Internet using secure protocols such as SSL (Secure Socket Layer).
- Access Control: Access to personal information is strictly restricted to personnel who need access to perform their job functions. We train our employees on our privacy and security policies to ensure data protection.

- **Regular Audits:** Our security systems and processes are regularly reviewed and updated to improve our handling of personal information and to mitigate potential risks of data breaches.
- **Physical Security:** Physical measures are in place to ensure the security of information at our facilities. This includes secured buildings, controlled access to our data centers, and secure destruction of media containing personal data.

ARTICLE 5: Rights of Users

5.1 User Rights:

At Basile Consulting, Inc., we respect the rights of our clients and users regarding their personal information. These rights include:

- **Right to Access:** You have the right to know whether your personal data is being processed, and, where that is the case, access to the personal data.
- **Right to Rectification:** You are entitled to have your personal information rectified if it is inaccurate or incomplete.
- **Right to Erasure:** You have the right to request the deletion or removal of personal data where there is no compelling reason for its continued processing.
- **Right to Restrict Processing:** You have the right to 'block' or suppress further use of your information under certain circumstances.
- **Right to Data Portability:** Where applicable, you have the right to receive your personal data in a structured, commonly used and machine-readable format and have the right to transmit that data to another controller.

• **Right to Object:** You have the right to object to the processing of your personal data in certain situations.

5.2 Exercise of Rights:

To exercise any of these rights, please contact us directly at our designated support address or through our website. Requests will be handled in accordance with the applicable legal requirements and without undue delay. We may require verification of your identity as part of the request process to ensure the security of your data.

ARTICLE 6: Third-Party Services

6.1 Overview of Third-Party Services:

Basile Consulting, Inc. utilizes various third-party services to enhance our website functionality and overall service delivery. These services may collect information through our website as part of their functionality. This includes, but is not limited to, analytics tools, marketing automation platforms, and customer relationship management systems.

- Analytics Services: These services collect data regarding visitor behavior on our site to measure traffic and usage trends. This information helps us to improve user experience and optimize our content.
- Marketing Automation: These platforms assist in managing email campaigns and communicate directly with clients, thereby necessitating access to client contact information.

We ensure that these third-party services are reputable and have privacy protections consistent with our standards. However, their data handling practices are governed by their respective privacy policies, which we encourage our users to review.

ARTICLE 7: International Transfer of Data

7.1 Transfer Mechanisms:

In certain circumstances, it may be necessary for Basile Consulting, Inc. to transfer personal data internationally, either to third parties or to our overseas facilities. When transferring data internationally, we take rigorous steps to ensure that adequate protections are in place to safeguard your personal information:

- **Data Transfer Agreements:** We utilize standard contractual clauses approved by regulators to ensure that data protection measures are maintained across borders.
- **Privacy Shield Framework:** Where applicable, we adhere to the principles of the Privacy Shield Framework, ensuring compliance with data protection requirements when transferring data between the United States and the European Union.

7.2 Security Measures:

We apply robust security measures consistent with international standards to protect data during transfer, including encryption and secure protocols.

ARTICLE 8: Data Retention

8.1 Retention Period:

Basile Consulting, Inc. retains personal information for as long as necessary to fulfill the purposes outlined in this privacy policy, unless a longer retention period is required or permitted by law. The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide our services to you;
- Whether there is a legal obligation to which we are subject (such as certain laws requiring us to keep records of your transactions for a certain period of time before we can delete them);
- Whether retention is advisable considering our legal position (such as regarding applicable statutes of limitations, litigation, or regulatory investigations).

We review our retention periods for personal information on a regular basis. When we no longer need to retain your personal information, we ensure that it is securely deleted.

ARTICLE 9: Cookies and Tracking Technologies

9.1 Use of Cookies:

Basile Consulting, Inc. uses cookies and similar tracking technologies to track the activity on our website and hold certain information. Cookies are files with a small amount of data which may include an anonymous unique identifier. These are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our service.

• **Purpose of Cookies:** Cookies help us enhance your access to our site and identify repeat visitors. For instance, when we use a cookie to identify you, you would not have to log in



a password more than once, thereby saving time while on our site. Cookies can also enable us to track and target the interests of our users to enhance the experience on our website.

ARTICLE 10: Compliance with Legal Obligations

10.1 Legal Compliance:

Basile Consulting, Inc. commits to comply with all applicable laws and regulations in the handling of personal data. Our compliance measures are designed to ensure that personal information is managed lawfully, fairly, and transparently.

• **Regulatory Compliance:** We regularly update our practices to keep pace with changes in the legal framework, ensuring our processing of your data meets all legal, financial, and ethical standards.

ARTICLE 11: Children's Privacy

11.1 Protection of Children's Personal Information:

Basile Consulting, Inc. recognizes the importance of protecting the privacy and safety of children. Our services are not directed to individuals under the age of 18 ("Children"). We do not knowingly collect, use, or disclose personal information from children under the age of 18 without obtaining prior consent from a parent or guardian.

• **Restrictions on Collection:** If we learn that we have collected personal information from a child under the age of 18 without verification of parental consent, we will take steps to remove that information from our servers as quickly as possible.

• **Parental Involvement:** We support parental control and encourage parents or guardians to take an active role in their children's online activities and interests.

11.2 Procedures for Handling Children's Data:

Should it become necessary to collect information from children under the age of 18, for example, through educational programs or services directed at children, Basile Consulting, Inc. will do so only with the explicit consent of the child's parent or guardian. This includes clear communication about the types of personal information being collected, how it will be used, and who will have access to it.

• **Consent Process:** We will provide parents or guardians with a consent form that must be signed and returned to us before any personal information of a child is collected. The form will clearly describe the purpose of the collection and how the data will be managed.

11.3 Commitment to Compliance:

Basile Consulting, Inc. is committed to complying with the Children's Online Privacy Protection Act (COPPA) and other applicable laws and regulations concerning children's privacy. We take every precaution to safeguard the information we collect from children under 18.

• **Review and Verification:** Our privacy practices are reviewed regularly to ensure compliance with COPPA and to maintain our commitment to protecting children's privacy. We also provide training to employees about the safe and effective handling of children's personal information.

ARTICLE 12: Minimization of Data

12.1 Principle of Data Minimization:

Basile Consulting, Inc. adheres to the principle of data minimization, ensuring that we collect only the information that is necessary for the specified purposes outlined in this policy. We are committed to collecting data that is relevant and limited to what is necessary in relation to the purposes for which it is processed.

- Limiting Data Collection: We limit the collection of personal information to what is directly relevant and necessary to accomplish the intended purpose of processing and refrain from collecting data in excess of what is required.
- **Periodic Review:** Regular evaluations are conducted to identify and eliminate any unnecessary data collection, thereby streamlining our data management practices.

ARTICLE 13: Changes to the Privacy Policy

13.1 Updates and Notifications:

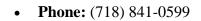
This Privacy Policy may be updated periodically to reflect changes in our privacy practices. Clients will be notified of any significant changes through our website or via direct communication, ensuring that they remain informed about the information we collect, how we use it, and under what circumstances, if any, it is disclosed.

ARTICLE 14: Contact Information

14.1 Queries and Concerns:

If you have any questions or concerns about this Privacy Policy or the handling of your personal data, please contact us at:

• Email:



• Address: 6 Abingdon court, Staten Island NY 10308.

We are committed to resolving any inquiries or issues concerning your privacy promptly.

ARTICLE 15: Effective Date

15.1 Policy Effective Date:

This Privacy Policy is effective as of 30th April 2024 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.