

FACCSE Website Privacy Policy

This Privacy Policy was last updated and is effective as of November 5, 2024.

A. Overview

This Privacy Policy (the “**Policy**”) governs the website (the “**Site**”) operated by or on behalf of the Finnish American Chamber of Commerce Southeast Inc. (“**FACCSE**”, the “**Chamber**”, “**we**”, “**us**” or “**our**”).

This Policy describes:

- The types of information we may collect or that you may provide when you download, register with, access, or use the Site.
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Policy applies only to information we collect on or through the Site. This Policy does not apply to information that we collect offline, or that you provide to or is collected by any third party, which may have their own privacy policies that we encourage you to read before providing your information on or through them (see “Third-Party Information Collection” below).

PLEASE READ THIS POLICY CAREFULLY TO UNDERSTAND OUR POLICIES AND PRACTICES REGARDING YOUR INFORMATION AND HOW WE WILL TREAT IT. IF YOU DO NOT ACCEPT THE TERMS OF THIS POLICY YOU MAY NOT ACCESS OR USE THE SITE AND YOU SHOULD DISCONTINUE YOUR USE OF IT. YOUR USE OF THIS SITE SHALL BE DEEMED TO BE YOUR AGREEMENT TO ABIDE BY EACH OF THE TERMS AND CONDITIONS SET FORTH IN THIS POLICY.

This Policy may change from time to time (see “Changes to Our Privacy Policy”). Your continued use of the Site after we revise this Policy means you accept those changes, so please check this Policy periodically for updates.

B. How We Collect Information

We collect information from and about users of the Site:

- Directly from you when you provide it to us.
- Automatically when you use the Site.

C. Information You Provide Directly to Us

When you download, register with, access, or use any aspect of the Site, we may ask you to provide the following types of information:

- Information by which you may be personally identified, including but not limited to, your name, postal address, email address, and telephone number (“**personal information**”).
- Payment information, including but not limited to, credit card information.

This information may be provided by you in the following ways:

- **Filling in forms on the Site.** This includes information that you may provide when downloading, registering with, accessing, or using any aspect of the Site, when requesting further services, and when reporting problems with the Site.
- **Contacting us.** This includes information you may provide when you correspond with us, including, but not limited to, email addresses and phone numbers.

- **Participating in surveys.** This includes information you may provide when you respond to surveys that we might ask you to complete for research purposes.
- **Carrying out transactions.** Details of transactions you carry out through the Site and of the fulfillment of your orders. You may be required to provide financial information before placing an order through the Site.
- **Searching within the Site.** This includes information you may provide when you perform search queries on the Site.

If you provide information for publication or display (“**Posted**”) on public areas of the Site or websites you access through the Site (collectively “**User Contributions**”), then your User Contributions are Posted and transmitted to others at your own risk. Additionally, we cannot control the actions of third parties with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

D. Automatic Information Collection and Tracking

When you download, register with, access, or use any aspect of the Site, the Site may use technology to automatically collect:

- **Usage Details.** When you access and use the Site, we may automatically collect certain details of your access to and use of the Site, including traffic data, location data, logs, and other communication data and the resources that you access and use on or through the Site.
- **Device Information.** We may collect information about your mobile device and internet connection, including the device’s unique device identifier, IP address, operating system, browser type, mobile network information, and the device’s telephone number.
- **Stored Information and Files.** The Site may also access metadata and other information associated with other files stored on your device. This may include, for example, photographs, audio and video clips, personal contacts, and address book information.

If you do not want us to collect any of the above information, then you may decide not to use the Site or not to download the mobile application, or delete the mobile application from your device. For more information, see “Your Choices About Our Collection, Use, and Disclosure of Your Information” below.

E. Information Collection and Tracking Technologies

The technologies we use for automatic information collection may include:

- **Cookies (or mobile cookies).** A cookie is a small file placed on your smartphone. It may be possible to refuse to accept mobile cookies by activating the appropriate setting on your smartphone. However, if you select this setting you may be unable to access certain parts of our Site. We use session cookies and persistent cookies on the Site. Session cookies are used during a given user session on our Site and enable us to efficiently provide the Site to you for the things that you want to do on the Site. Persistent cookies identify users if the users have accepted the use of such cookies. These help us remember your choices and preferences when using the Site and between visits to the Site.
- **Web Beacons.** The Site and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the FACCSE, for example, to count users who have visited those pages or opened an email and for other related app statistics (for example, recording the popularity of certain app content and verifying system and server integrity).

F. Third-Party Information Collection

Generally. When you use the Site or its content, certain third parties may use automatic information collection technologies to collect information about you or your device. These third parties may include:

- Advertisers, ad networks, and ad servers.
- Analytics companies. Please see additional information below under “Our Use of Google Analytics”.
- Your mobile device manufacturer.
- Your mobile service provider.

These third parties may use tracking technologies to collect information about you when you use the Site. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites, apps, and other online services websites. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties’ tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

Payments Processing. For programs and/or services offered through the Site, we use third-party services for payments processing (e.g., payment processors). The FACCE itself will not store or collect your payment card details. That information is provided directly by you to our third-party payment processors whose use of your personal information for such purposes is governed by their respective privacy policy. These payment processors may include, without limitation, Stripe and PayPal. Payment processors are required by an industry self-governing body to adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

Other Sites. Our Site may contain links to other sites and applications/apps that are not operated by us. If you click a third party link, you will be directed to that third party’s site or app. We strongly advise you to review the applicable privacy policy of every site or app you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites, apps or services that are linked from our Site.

G. Our Use of Google Analytics

We use a tool called “Google Analytics” to collect information about use of this site. Google Analytics collects information such as how often users visit or use the Site, what pages users visit when they do so, and what other sites user used prior to coming to the Site. For more information regarding how Google uses such information, please visit the following website: <https://www.google.com/policies/privacy/partners/>.

We use the information we get from Google Analytics to improve the Site. Google’s ability to use and share information collected by Google Analytics about your visits to the Site is subject to and restricted by the Google Analytics Terms of Use (<https://marketingplatform.google.com/about/analytics/terms/us/>) and the Google Privacy Policy (<https://policies.google.com/privacy>). You can prevent Google Analytics from recognizing you on return

visits to the Site by disabling cookies on your browser. For more information on disabling cookies on your browser, see “Your Choices About Our Collection, Use, and Disclosure of Your Information” below.

H. How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information, to:

- Provide you with the Site and its contents, and any other information, programs, or services that you request from us.
- Fulfill any other purpose for which you provide it.
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- Notify you when updates for the Site are available, and of changes to any programs or services we offer or provide through it.

The usage information we collect helps us to improve the Site and to deliver a better and more personalized experience by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize the Site according to your individual interests.
- Speed up your searches.
- Recognize you when you use the Site.

We may also use your information to contact you about goods and services that may be of interest to you, including our own goods and services or the goods and services of third parties. For more information, see “Your Choices About Our Collection, Use, and Disclosure of Your Information” below.

We may use the information we collect to display advertisements. Even though we do not disclose your personal information for these purposes, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

I. Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not identify any individual without restriction.

In addition, we may disclose personal information that we collect or you provide:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the FACCSE’s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by the FACCSE about the Site’s users is among the assets transferred.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce our rights arising from any contracts entered into between you and us and for billing and collection.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the FACCSE, our customers, or others.

J. Your Choices About Our Collection, Use, and Disclosure of Your Information

This section describes mechanisms that we provide for you to control certain uses and disclosures of your information.

- **Tracking Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. However, if you disable or refuse cookies or block the use of other tracking technologies, some parts of the Site may then be inaccessible or not function properly.
- **Promotions by the FACCSE.** You can opt-out of receiving promotional materials by logging into the Site and adjusting your user preferences in your account profile or by selecting “unsubscribe” in emails we send to you.

California residents may have additional personal information rights and choices. Please see “Your California Privacy Rights” below for more information.

K. Accessing and Correcting Your Personal Information

You can review and change your personal information by logging into the Site and visiting your account profile page.

You may also contact us by using the contact information noted below under “Contact Information” to request access to, correct, or delete any personal information that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you delete your User Contributions from the Site, copies of your User Contributions may remain viewable in cached and archived pages or might have been copied or stored by other Site users.

California residents may have additional personal information rights and choices. Please see “Your California Privacy Rights” below for more information.

L. Children’s Privacy and Age Limitations for the Site

The Site is intended for use by persons aged 18 or older, and by your use of this Site you affirm that you are at least 18 years of age. We do not knowingly collect personal information from children under the age of 18. If we discover or are made aware that we have received personal information from an individual who indicates that he or she is, or whom we otherwise have reason to believe is, under the age of 18, we will delete such information from our systems. If you are a parent or legal guardian of a child under the age of 18 and believe that your child has disclosed personal information to us we welcome you contacting us as provided below so that we can address such matter.

From time to time there may be instances when we collect information through the Site about children under the age of 18 but we will only do this when such information is provided to us by that child’s parent or legal guardian. In all cases where we’ve collected information about a child under the age of

18, the parent or legal guardian may contact us as provided below to review and request deletion of such child's personal information as well as to prohibit the further use of such information by us.

California Minors

California residents under 18 years of age may have additional rights regarding the collection and sale of their personal information. Please see "Your California Privacy Rights" below for more information.

M. Changes to Our Privacy Policy

We may update this Policy from time to time. If we make material changes to how we treat our users' personal information, we will post the most recent privacy policy on this page.

The date that this Policy was last revised is identified at the top of the page. You are responsible for periodically visiting this Policy to check for any changes.

N. Your U.S. State Privacy Rights.

N.1 Additional Rights Under State Laws.

U.S. state consumer privacy laws provide residents of certain states additional rights regarding our use of their personal information. In particular, the following state-specific rights may be applicable to you:

- California residents have the rights set forth in more detail in subsection N.3 below of this Policy.
- Residents of Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Montana, Oregon, Tennessee, Texas, Utah, and Virginia residents have rights to:
 - Confirm whether we process their personal information.
 - Access and delete certain personal information.
 - Correct inaccuracies in their personal information, taking into account the information's nature and the purpose of the processing (excluding Iowa and Utah).
 - Data portability.
 - Opt-out of personal data processing for:
 - o targeted advertising (excluding Iowa);
 - o sales; or
 - o profiling in furtherance of decisions that produce legal consequences or other similarly significant effects (excluding Iowa and Utah).
 - Either limit (opt-out of) or require consent to process sensitive personal data.

To exercise any of these rights please contact us as noted in the "Contact Us" portion of this Policy.

N.2 Appeals of Decisions Concerning Your Rights

For residents of California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Montana, Oregon, Tennessee, Texas, Utah, and Virginia, to appeal any decision that we make with regard to your exercise of any of your aforementioned rights, please contact us as noted in the "Contact Us" portion of this Policy.

N.3 Your California Privacy Rights

The following additional privacy notices for California residents (the "**California Notice**") supplement the information contained in the other portions of this Privacy Policy and apply solely to individuals who reside in the State of California ("**California consumer**" or "**you**"). The FACCSE adopts this California Notice to comply with the California Consumer Privacy Act, as amended by the California Privacy Rights Act, and their related regulations (collectively the "**California Privacy Law**" or the "**CCPA**") and other applicable California laws.

Overview of Consumer Rights Under the CCPA

Under the CCPA, California consumers have certain rights regarding their personal information, including:

- The right to know the categories of personal information that we have collected and the categories of sources from which we obtained such information.
- The right to know our business purposes for sharing personal information.
- The right to know the categories of third parties with whom we shared personal information.
- The right to know if we sold or disclosed your personal information for a business purpose, comprising two separate lists disclosing:
 - any sales, which list identifies the personal information categories that each category of recipient purchased (note that at present we do not sell personal information that we collect); and
 - any disclosures for a business purpose, which list identifies the personal information categories that each category of recipient obtained.
- The right to access the specific pieces of personal information that we have collected
- The right to correct personal information that we have collected.
- The right to delete your personal information.
- The right to not be discriminated against if you exercise your rights under the CCPA.

The provisions below of this California Notice provide further details about these and other rights and certain details about the exercise of such rights.

Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California consumer, household or device (collectively, "personal information"). Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated California consumer information.
- Information excluded from the CCPA’s scope, including:
- Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; and
- Personal information covered by certain other laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

We have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples
Identifiers	An individual’s name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number or other similar identifiers

Personal information categories described in Cal. Civ. Code § 1798.80(e)	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information (Note: Certain of the above information may be considered to be sensitive personal information under the CCPA and, to the extent such data is considered to be sensitive personal information you have the right to limit the use and disclosure of such data.)
Commercial information	Records of personal property, programs or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
Internet or other similar network activity	Browsing history, search history, information on a California consumer's interaction with our website, application, or advertisement and any social media sites from which user information is linked, connected or obtained
Geolocation data	Physical location or movements (Note: Certain precise geolocation data may be considered to be sensitive personal information under the CCPA and, to the extent such data is considered to be sensitive personal information you have the right to limit the use and disclosure of such data.)
Professional or employment-related information.	Current or past job history or performance evaluations.
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.
Inferences drawn from other personal information	Examples include a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes

Sources of Personal Information

In addition to sources of personal information addressed elsewhere in this Privacy Policy, we obtain the categories of personal information listed above from the following categories of sources:

- **Directly From You.** For example, from forms you complete or programs and services you purchase or from communications with you such as when you contact us (whether in person, by mail, by phone, online, via electronic communication or by other means) including our customer support service.

- **Indirectly From You.** For example, from observing your actions on our website or from programs or services that you have purchased from us, if you have enabled such functionality, such as telemetry services.
- **From Others.**
 - From third party service providers. For example, if you choose to make an electronic payment directly to us, or through a linked website or mobile application, or through an affiliate of ours, we may receive personal information about you from third parties such as payment services providers, for the purposes of that payment.
 - From affiliates. We may collect personal information about you from our affiliates or others acting on their behalf.
- **From Public Sources.** For example, we may collect information from public records.

Uses of Personal Information

In addition to uses of personal information addressed elsewhere in this Privacy Policy, we may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill the reason that you provided the information. For example, if you share your name and contact information to request a price quote, request to be contacted by an affiliate, or ask a question about our programs or services, we will use that personal information to respond to your inquiry. If you provide your personal information to attend or purchase a program or service, we may use that information to process your payment and facilitate delivery. We may also save your information to facilitate new program or service orders or to process returns.
- To perform services such as customer service, order fulfillment, payment processing, financing and advertising, marketing or analytic services.
- To advance our commercial or economic interests, such as by helping you to buy, rent, lease, join, subscribe to, provide, or exchange programs, information, or services, or enabling or effecting, directly or indirectly, a commercial transaction.
- To verify or maintain quality or safety standards or improve or upgrade a program or service provided or controlled by or for us.
- To provide, support, personalize and develop our website, programs and services.
- To create, maintain, customize and secure your account with us.
- To process your requests, purchases, transactions and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your website experience and to deliver content and program and service offerings relevant to your interests, including targeted offers and ads through our website, third-party sites and via mail, email or text message (with your consent, where required by law).
- To help maintain the safety, security and integrity of our website, programs and services, databases and other assets and business.
- For testing, research and analysis purposes, including to develop and improve our website, programs and services.
- To respond to law enforcement requests and as required by applicable law, court order or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA or applicable law.
- To send you information relevant to your past purchases and interests, subject to compliance with applicable laws regarding direct marketing.
- To otherwise use as reasonably necessary and proportionate to achieve our operational or

notified purpose for collecting personal information and as compatible with the context in which we collected the information.

- To perform services on behalf of a CCPA-covered business or its service provider, such as customer service, order fulfillment, payment processing, financing and advertising, marketing, or analytic services.
- To review and audit our business interactions with you.
- To detect or prevent security incidents or other illegal activity.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of a bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our website users, including California consumers, is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated or incompatible purposes without providing you notice.

Sharing Personal Information

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

- Identifiers
- Personal information categories described in Cal. Civ. Code § 1798.80(e)
- Commercial information
- Internet or other similar network activity
- Professional or employment-related information
- Non-public education information
- Inferences drawn from other personal information

The categories of third parties to which we may disclose personal information collected by us include the following:

- Service providers
- Affiliates
- Recipients of data from cookies

Sales of Personal Information

The FACCSE does not sell personal information to third parties.

Exercising Your CCPA Rights and Choices

The sections below describe how you may exercise your rights under the CCPA.

Access to Specific Information and Data Portability Rights. You have the right to request that we disclose certain information to you about our collection and use of your personal information. Once we receive and confirm your verifiable consumer request (see “Exercising Access, Data Portability and Deletion Rights” below), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we disclosed your personal information for a business purpose, a list disclosing the personal information categories that each category of recipient obtained.

As allowed by the CCPA, we do not provide these access and data portability rights for business-to-business personal information.

Deletion and Correction Request Rights.

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see “Exercising Access, Data Portability, Deletion and Correction Rights” below), we will delete (and direct our service providers to delete) your personal information from our (and service provider) records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a program or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug our Site.
- Exercise free speech, ensure the right of another California consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with California consumer expectations based on your relationship with us, such as future field campaigns or any safety issues.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

As allowed by the CCPA, we do not provide these deletion rights for business-to-business personal information.

In addition, if you provide us with a verifiable consumer request to correct inaccurate personal information that we maintain about you, we will use commercially reasonable efforts to correct such information in accordance with your instructions.

Exercising Access, Data Portability, Deletion and Correction Rights.

To exercise the access, data portability, deletion and correction rights described above, you should submit a verifiable consumer request to us by using the contact information above under “Contact Information”.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of a minor child for whom you are a parent or legal guardian.

You may only make a verifiable consumer request for access or data portability twice within a twelve (12) month period. The verifiable consumer request must provide sufficient information that allows us to reasonably verify that you are the person about whom we collected personal information or an authorized representative, which may include:

- Your name
- Your address
- Additional information depending upon the type of request and the sensitivity of the information involved with such request
- Describe your request with sufficient detail to enable us to properly understand, evaluate and respond to such request.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or your authority to make the request and confirm that the personal information involved with the request relates to you.

Making a verifiable consumer request does not require you to create an account with us. However, we will consider requests made through a password-protected online account that you maintain with us to be sufficiently verified when the request relates to personal information associated with that online account, provided such online account functionality is then made available by us on the website.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time, we will inform you of the reason and extension period in writing.

If you have an online account with us, we may deliver our written response to that online account, provided that such online account functionality is then made available by us on the website. If you do not have an online account with us, or such functionality is not available for your online account we will deliver our written response by mail or electronically, at your option.

If we're unable to comply with your request, the response we provide will also explain the reasons we cannot comply with the request. For data portability requests, we will select a format to provide your personal information that is readily usable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA or other applicable law, we will not as a result of you exercising any of your rights under the CCPA:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

Retention of Personal Information

Our policy is to retain personal information only for as long as is necessary to fulfill the reason for which the personal information was collected and as necessary to process such personal information. In addition to the above, we will retain your personal information for the purposes of satisfying any professional, legal, accounting or reporting requirements to which we are subject. To determine the appropriate retention period for personal information, we consider the scope, nature and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of the personal information, the purposes for which we collected and processed your personal information and whether we can reasonably achieve those purposes through other means, as well as any applicable legal and professional requirements.

Other California Privacy-Related Disclosures

Sharing Personal Information for Direct Marketing Purposes. Before sharing personal information of California consumers with third parties for direct marketing purposes we will obtain opt-in consent from the applicable California consumers or provide such California consumers with a cost-free method to opt out.

California Do-Not-Track Disclosure. At this time, the website is not set up to honor web browser do-not-track settings. Do-not-track is a privacy preference that users can set in their web browsers. When a user activates the do-not-track settings in browsers that offer this setting, the browser sends a message to websites or applications requesting them not to track the user. For more information about do-not-track matters, please visit www.allaboutdnt.org.

Information on Marketing Disclosures. California Civil Code Section 1798.83 permits our users who are California residents to request and obtain from us once a year, free of charge, information about the personal information (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year. If applicable, this information would include a list of the categories of personal information that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us by using the contact information above under "Contact Information".

Content Removal Requests for website Users Under 18 Years Old. If you are a website user under 18 years of age and reside in California, you may request and obtain removal of, content or information that you have posted on the website. You may send us any such requests by one of the following methods: (i) by email (writing "Privacy Policy/Removal Request" in the subject line) or (ii) by postal mail by using the contact information above under "Contact Information". We will review the request and respond

promptly. You should be aware that a request to remove content or information posted by you on the website does not ensure or require complete or comprehensive removal of such content or information from our databases.

Complaints

If you have any complaint about use of the website, you may contact us by email or by postal mail by using the contact information above under “Contact Information”. In accordance with California Civil Code Section 1789.3, California residents may also file complaints with the Complaint Assistance Unit, Division of Consumer Services, California Department of Consumer Affairs by postal mail at 1625 North Market Road, Suite N112, Sacramento, CA 95834 or by telephone at 800-952-5210.

Changes to Our California Notice

We reserve the right to amend this California Notice at our discretion and at any time. When we make changes to this California Notice, we will post the updated California Notice on the website and update the California Notice’s effective date. Your continued use of our website following the posting of changes constitutes your acceptance of such changes.

O. Your EU Privacy Rights

Persons who are residents of the member countries of the European Union (“EU”) or other data subjects covered by the EU’s General Data Protection Regulation, (EU) 2016/679 (the “GDPR”), have certain additional privacy rights under applicable law. The following provisions of this Privacy Policy provide an overview of these additional rights.

Legal Bases for Processing Personal Information of European Union Citizens

When processing your personal information, the FACCSE may rely on one or more of the following legal bases (or other available legal grounds), depending on the circumstances:

- **Legitimate Interests.** We may process your personal information where the FACCSE has a legitimate interest in such processing for managing, operating or promoting our business, and that legitimate interest is not overridden by your interests, fundamental rights or freedoms.
- **Consent.** We may process your personal information where the FACCSE has obtained your consent to the processing.
- **Contractual Necessity.** We may process your personal information where such processing is necessary in connection with any contract that the FACCSE has with you.
- **Legal Requirements.** We may process your personal information where such processing is required by applicable law.

Disclosures to Third Parties

Your personal information will not be disclosed to third parties except for where it is necessary for fulfillment of the FACCSE’s obligations to you or where the FACCSE is obliged or permitted to do so by law (including, without limitation, through the terms of any agreement the FACCSE may have with you), or where the FACCSE makes disclosures that are otherwise consistent with the uses described in this Policy.

The FACCSE may also disclose any information (including personal information) relating to you to law enforcement authorities or any regulatory or government authority in response to any request including requests in connection with the investigation of any suspected illegal activities.

The FACCSE reserves the right to transfer any personal information the FACCSE has about you in the event the FACCSE sells or transfers all or a portion of our business or assets, or merges with another organization. Should such a sale, transfer or merger occur, the FACCSE will use reasonable efforts seeking to require that the transferee uses personal information you have provided to the FACCSE in a manner that is consistent with this Policy.

We will not sell, resell or lease your personal information to any third parties but the FACCSE may, if required for the purpose(s) for which your personal information was collected and processed, share it with the FACCSE partners and/or service providers to enable them to provide their services to the FACCSE or to you, as applicable. The foregoing uses are in addition to the other uses described elsewhere in this Policy.

Security of Personal Information of European Citizens

The FACCSE has policies and technical and organizational measures in place which are intended to safeguard and protect your personal information against unauthorized access, accidental loss, improper use and disclosure. However, you should be aware that information transmitted over the internet is not completely secure because of the nature of the internet and that systems and measures used to secure information are not flawless. For these reasons, although the FACCSE will use reasonable efforts to protect your personal information, the FACCSE does not warrant the security of personal information transmitted to the FACCSE or stored by the FACCSE, and personal information that is transmitted to the FACCSE by you electronically is done at your own risk.

Retention of Personal Information of European Citizens

Our policy is to retain your personal information only for as long as is necessary to fulfill the purposes for which the FACCSE collected such personal information, including for the purposes of satisfying any professional, legal, accounting or reporting requirements to which the FACCSE is subject. To determine the appropriate retention period for personal information, the FACCSE considers the scope, nature and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of the personal information, the purposes for which the FACCSE collected and processed your personal information and whether the FACCSE can achieve those purposes through other means, and any applicable legal and professional requirements.

Your Rights as a European Citizen

You have a number of rights concerning your personal information that the FACCSE holds and uses, including the following:

- **Right of Access.** You have the right to be informed about what personal information the FACCSE holds about you and to a copy of this personal information.
- **Right to Rectification.** You have the right to have any inaccurate personal information which the FACCSE holds about you updated or corrected.
- **Right to Erasure.** In certain circumstances you may request that the FACCSE delete the personal information that the FACCSE holds about you.
- **Right to Complain.** You have the right to lodge a complaint regarding the processing of your personal information to an applicable governmental or supervisory authority in your country.
- **Right to Withdraw Consent.** Where processing of personal information is based on your consent, you have the right to withdraw such consent at any time.
- **Right to Object.** Where the FACCSE relies on our legitimate interests to process your personal information, you have the right to object to such use and the FACCSE is required to discontinue

such processing unless the FACCSE can demonstrate an overriding legitimate interest in such processing.

- **Right to Restriction.** You have the right to request that the FACCSE stop using your personal information in certain circumstances including if you believe that the personal information the FACCSE holds about you is inaccurate or that the FACCSE's use of your personal information is unlawful. If you validly exercise this right, the FACCSE will store your personal information and will not carry out any other processing until the issue is resolved.

You may exercise any of the above requests in writing to the FACCSE by mail or by postal mail by using the contact information above under "Contact Information". You are also free at any time to request that the FACCSE stop using your personal information for marketing purposes by using the contact information above under "Contact Information".

P. Contact Information

For inquiries, requests and other matters concerning this Policy and our privacy practices, you may contact the FACCSE by one of the following methods:

- Emailing us at: info@faccse.org
- By postal mail at: Finnish American Chamber of Commerce of the Southeast, % SGR LAW, 1105 W. Peachtree St. NE, Suite 1000, Atlanta, GA 30309
- By accessing your online account that you maintain with us (if such functionality is then enabled on the Site)