

PRIVACY STATEMENT

Policy last updated on: November 17th, 2023

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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 is 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.

To whom does this policy apply?

This privacy statement applies to person who:

- Visits and uses the Gorman Consulting website
- Communicates with Gorman Consulting
- Applies for positions at Gorman Consulting
- Is employed (staff and consultants) at Gorman Consulting.

Below, "you" refers to any individual who Gorman Consulting staff may come into contact through any of these means.

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. 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 the 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. In each case, the table indicates which personal data we use for a specific purpose and what legal basis allows us to process the given data. Retention periods are detailed in the right column; Gorman Consulting does not store your personal data for longer than is strictly necessary to achieve the purposes for which your data is collected. After the retention periods for keeping your personal data expire, Gorman Consulting will delete/dispose your data securely.

Activity from which personal data is acquired	Personal Data Collected	Legal Basis	Retention period
Contact	Gorman Consulting may need to gather and use information about individuals, which can include 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,	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	10 years after the last contact

	phone number and meta data and content of correspondence with you, the data subject.	Consulting legitimate interest.	
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>	5 years after application
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 after employment ends
Website	<p>In order to provide professional services, Gorman Consulting processes 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>	12 months after collection

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.

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 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 using the emails below 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.

Privacy Framework Notice

This notice explains how we obtain and process personal data from the EU/EEA in compliance with the new adequacy decision of European Commission from 10th July concluding the EU-U.S. Data Privacy Framework (EU-U.S. DPF) agreement which enables transfers of personal data according to Article 45 GDPR from the EU/EEA to organizations in the U.S.

Gorman Consulting has certified to the U.S. Department of Commerce that it adheres to the Data Privacy Framework Principles (Principles) with regard to the processing of personal data received from the EU/EEA in reliance on the EU-U.S. DPF. Therefore, to prove compliance with this mechanism, we provide this notice that outlines how we specifically address the Principles of this agreement, which are essentially rules. If there is any conflict between the terms in this Privacy Policy and the EU-U.S. DPF Principles, the Principles shall govern.

To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit:

<https://www.dataprivacyframework.gov/>.

The following content and table summarize how we comply with the Principles with respect to all personal data received from the EU/EE.

Principle	Description
Notice	This Privacy Policy in combination with this Privacy Framework Notice describes our privacy practices with respect to personal data received from the EU/EEA in reliance on the Data Privacy Framework.
Choice	You may choose (opt-out) whether your personal information is to be (i) disclosed to a third party or (ii) used for a purpose that is materially different from the purpose(s) for which it was originally collected or subsequently authorized. Nevertheless, this is not an option when disclosure is made to a third party that is acting as an agent to perform task(s) on behalf of and under the instructions of the organization (e.g., data processor). However, where such use or transfer involves sensitive information (e.g., personal information specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or information specifying the sex life of the individual), you must consent (opt-in) before such disclosure or use.
Accountability for Onward Transfer	We may transfer personal information for the purposes described in this Privacy Policy to third parties, including agents, regulatory authorities and service providers. We may transfer personal information to a third party acting as a data controller or as an agent. Such information may only be processed for limited and specified purposes consistent with the consent provided by the individual and with the same level of privacy protection as required by the Principles. We take reasonable and

	<p>appropriate steps to ensure that the agent effectively processes the personal information transferred in a manner consistent with the Principles; we require the agent to notify us if it makes a determination that it can no longer meet its obligation to provide the same level of protection as is required by the Principles; and upon such notice, we take reasonable and appropriate steps to stop and remediate unauthorized processing.</p> <p>We remain responsible for the processing of personal information we receive, and subsequent transfers to a third party acting as an agent on its behalf, unless we prove that we are not responsible for the event giving rise to the damage. We try to minimize disclosures of personal information as reasonably practical because we are mindful of our responsibility and potential liability in cases of onward transfers to third parties.</p> <p>We may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. For further information about how we disclose your personal information, please see With whom does Gorman Consulting share Personal data?</p>
Security	<p>We take reasonable and appropriate measures to protect your personal information from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into due account the risks involved in the processing and the nature of the personal data.</p>
Data Integrity and Purpose Limitation	<p>We process personal information only for the purposes indicated in this Privacy Policy, and we will not process personal information in a way that is incompatible with these purposes unless subsequently authorized by you. Therefore, we take reasonable steps to limit the collection and usage of personal information to that which is relevant for the purposes for which it was collected, and to ensure that such information is reliable for its intended use, accurate, complete and current.</p> <p>We will retain your personal information in an identifiable form only for the period necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law or by the Principles. In these cases, we will adhere to the Principles for as long as we retain any personal information collected under the EU-U.S. DPF.</p>
Access	<p>You have the right to access personal information that we hold about you and the right to request that we correct, amend or delete that information if it is inaccurate or processed in violation of the Principles. These rights would nevertheless be excluded in cases where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy in the case in question, or where the rights of persons other than the individual would be violated.</p> <p>If you would like to request access to, or a correction, amendment, or deletion of your personal information, you can submit a written request to the contact information provided below. We may request specific information from you to confirm your identity. In some circumstances we may charge a reasonable fee for access to your information.</p>

Recourse, Enforcement and Liability	<p>In compliance with the Principles, we commit to resolving complaints about our collection or use of your personal information. EU/EEA individuals with inquiries or complaints regarding this Privacy Framework Notice should first contact Gorman Consulting at the contact information provided below.</p> <p>Gorman Consulting has further committed to cooperate with the panel established by the EU Data Protection Authorities (DPA) with regard to unresolved complaints concerning personal information transferred from the EU/EEA, including human resources data transferred in the context of the employment relationship.</p> <p>More information on how to submit a complaint can be found here: https://www.dataprivacyframework.gov/s/article/How-to-Submit-a-Complaint-Relating-to-a-Participating-Organization-s-Compliance-with-the-DPF-Principles-dpf.</p> <p>Under certain conditions, you may also be able to invoke binding arbitration for complaints regarding DPF compliance. More information on that can be found here: https://www.dataprivacyframework.gov/s/article/ANNEX-I-introduction-dpf?tabset-35584=2</p> <p>For the purposes of enforcing compliance with the EU-U.S. DPF, Gorman Consulting is subject to the investigatory and enforcement authority of the US Federal Trade Commission (FTC).</p>
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What are your rights?

If you are located in the EEA, Switzerland, or United Kingdom and we maintain your personal information, you have the following additional rights with regard to your personal information:

Type	Description
Right to information	You have the right to obtain a confirmation from Gorman Consulting's European Data Protection Officer on to whether or not personal data concerning you are being processed, and, where that is the case, all necessary information to make the process transparent
Right of access	<p>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.</p> <p>Under the European Union's General Data Protection Regulation ("GDPR") a response to your access request will be provided free of charge, unless the request is deemed to be manifestly unfounded, excessive or repetitive in character. We may charge you a reasonable fee if you request additional copies of your personal information or make other requests that are manifestly unfounded or excessive. If we are unable to honor your request, or before we charge a fee, we will let you know why.</p>
Right to rectification	You have the right to request 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 all or some of 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. This right may be limited if we have collected your personal information for research purposes.
Right to restriction	In some cases, you have the right to request that we restrict or limit the processing of all or some 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. Therefore, even if you withdraw your consent, we have the right to use your personal data if it has been fully anonymized and cannot be used to personally identify you.
Right to lodge complaint	You have the right to lodge a complaint with the supervisory authority in your country if you believe our processing of your personal data violates applicable law. You can find your supervisory authority here: https://edpb.europa.eu/about-edpb/about-edpb/members_en

For California Residents Only

If you are a California resident, there are some rights that may be available to you under the California Privacy Rights Act (CPRA). This policy explains the tools that we have made available to you to exercise your data rights under the CPRA, such as the right to deletion, right to correct inaccurate personal information (right to rectification), right to object to sharing of your personal data and the use of sensitive personal information, right to opt-out of behavioral profiling and automated decision-making, right to data portability and the right to request access to the categories of personal 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 CPRA - such as to protect against illegal activities, and for the development of new products, features, and technologies.

We don't sell your personal information.

Contact Information

We welcome your questions and comments about this Privacy Policy or how we process your personal information. Or, if you wish to exercise any of your rights listed above, please contact us using the information below and we will respond to you as soon as reasonably possible, at least 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.

Gorman Consulting, Inc

707 Driftwood Lane, Edmonds

Washington 98020

United States

Email: admin@gormanconsulting.org

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

For Individuals located in the EEA, Switzerland, or the United Kingdom:

If you have a question about your personal information or would like to exercise your data protection rights, please click here to submit your request through our web portal or contact one of the individuals below:

European Data Protection Officer:

Email: koen@gormanconsulting.org

European Data Protection Representative:

PrighterGDPR-Rep by Maetzler Rechtsanwalts GmbH & Co KG

Marshalllaan 2, unit 2.02

2625 GZ Delft

Netherlands

Website: <https://prighter.com>