



# Privacy Policy

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This Privacy Policy is for CyberSecurityEasy.com Corporate Web page

**Be advised that each of the products and services provided by Kravets and Associates LLC doing business as CyberSecurityEasy.com such as group, individual or business training, coaching, business consulting, tutoring, briefing, participating, or organizing keynote speaker events, etc. is subject to its own agreements, terms and conditions. Use of each individual product and service offered and/or provided by Kravets and Associates LLC doing business as CyberSecurityEasy.com is subject to their own set of policies, terms, and conditions as posted on their prospective webpages and dashboards or provided agreements and notifications. Such policies, terms and conditions may be different from each other.**

Kravets and Associates LLC doing business as CyberSecurityEasy.com LLC. appreciates your interest in its products and your visit to this website CyberSecurityEasy.com. The protection of your personal data during processing is an important concern for us, and we want you to feel secure when visiting our website. In this policy, we explain what information we collect and process during your visit to our web site [www.CyberSecurityEasy.com](http://www.CyberSecurityEasy.com).

## **Definitions and Interpretation**

In this Agreement the following terms shall have the following meanings:

“CyberSecurityEasy” means Kravets & Associates LLC doing business as CyberSecurityEasy.com LLC.

## *General Information*

We (hereinafter “CyberSecurityEasy”, “we”, “our”, “us”) are responsible for this online offer and must inform you at the beginning of your visit to our online offer about the type, scope and purposes of the collection and use of personal data in a precise, transparent, comprehensible and easily accessible form in clear and simple language. We are therefore obliged to inform you which personal data is collected or used.

## **The Regulations**

We value the security of your data and compliance with data protection regulations. As CyberSecurityEasy is a company operating in Illinois, the collection, processing and use of personal data is subject to the provisions of the Illinois Consumer Privacy Act (ICPA) and the European General Data Protection Regulation 2016/679 (GDPR). Further and given the similarity of the in spirit and notion akin provisions of the California Consumer Privacy Act (CCPA) and Nevada Privacy of Information Collected on the Internet from Consumers Act (NPICICA), we apply the most stringent provisions in instances where conflict arises. In this sense, CyberSecurityEasy strives to ensure certainty, transparency and uniformity amongst all its personal data processing activities.

## **Personal data**

Personal data is individual information about personal or factual circumstances of a specific or identifiable natural person. This includes information such as your real name, address, e-mail address, home address, educational and employment records, skills set, telephone number and other information about you or your company. Personal information may also include data that is publicly available. This includes, for example, information from social networks such as Facebook, LinkedIn, Twitter, Google and other service providers.

## *Your Rights*

You are entitled at any moment to enforce the rights available to you under applicable Data Protection Laws, including but not limited to the right of access, rectification, restriction, erasure, opposition (including objecting,



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at any time and for free, to the processing of your personal data for direct marketing purposes), right to portability as well as the right to withdraw your consent. You also have the right to lodge a complaint with the competent supervisory authority. In more details the following briefly summarizes your rights.

As an individual whose personal data is processed as described in this Privacy Policy, you have a number of rights which are summarized below. Please note that exercising these rights is subject to certain requirements and conditions as set forth in applicable law.

## **Right of access**

Subject to applicable law, you have the right to obtain confirmation from us as to whether or not personal data that concerns you is processed, and, if so, to request access to such personal data including, without limitation, the categories of personal data concerned, the purposes of the processing and the recipients or categories of recipients. However, we do have to take into account the rights and freedoms of others, so this is not an absolute right. If you request more than one copy of the personal data undergoing processing, we may charge a reasonable fee based on administrative costs.

## **Right to rectification**

You have the right to request from us the rectification of inaccurate personal data concerning you. Depending on the purposes of the processing, you also have the right to request that incomplete personal data be completed, including by means of providing a supplementary statement.

## **Right to erasure (right to be forgotten)**

You have the right to request from us the erasure of personal data concerning you in certain circumstances as defined under applicable law. When your request falls within one of those circumstances, we will erase your personal data without undue delay. If, for technical and organizational reasons, we were not able to erase your personal data, we will ensure that it is fully and irreversibly anonymized so that we will no longer be holding such personal data about you.

## **Right to restriction of processing**

In certain circumstances as defined under applicable law, you have the right to request the restriction of processing of your personal data. In such case, your personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest.

## **Right to data portability**

In certain circumstances as defined under applicable law, you have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format, and you may have the right to transmit that data to another controller or to have such personal data transmitted directly from us to another controller, where technically feasible.

## **Right to object**

In certain circumstances as defined under applicable law, you have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data by us, and we can be required to no longer process your personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims. This notably applies in case of processing of your personal data based on our legitimate interests or for statistical purposes.

## **Right to object to direct marketing**

Where your personal data are processed for direct marketing purposes, you have the right to object at any time to processing for such direct marketing (including profiling related to such direct marketing).



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## **Right not to be subject to a decision based solely on automated processing,**

Subject to certain restrictions, you have the right not to be subject to a decision based solely on automated processed, including profiling, which produces legal effects on you similarly significantly affects you.

## **Right to withdraw consent**

If you have declared your consent for any personal data processing activities as described in this Privacy Policy, you can withdraw this consent at any time with future effect. Such a withdrawal will not affect the lawfulness of the processing prior to withdrawal of the consent.

If you wish to access such personal data or exercise any of the rights listed above, you should apply in writing, providing evidence of your identity to us.

Any communication from us in relation to your rights as detailed above will be provided free of charge. However, in case of requests that are manifestly unfounded or excessive, in particular because of their repetitive character, we may charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or refuse to act on the request.

**Shine the Light-** In addition under California's "Shine the Light" law, California residents who provide personal information (as defined in the statute) to obtain services are entitled to request and obtain from us, once per calendar year, information about the personal information we shared, if any, with other businesses for marketing uses. If applicable, this information would include the categories of personal information and the names and addresses of those businesses with which we shared such personal information for the immediate prior calendar year (e.g., requests made in the current year will receive information about the prior year). To obtain the information about data we hold about you or to effect the opt-out, please contact us.

## *The Legal Basis*

Insofar as we obtain the consent of the data subject for processing operations involving personal data, consent serves as the legal basis for the processing of personal data. When processing personal data that is necessary for the performance of a contract to which the data subject is a party, the performance of a contract serves as the legal basis. This also applies to processing operations that are necessary for the performance of pre-contractual measures. If processing of personal data is necessary for compliance with a legal obligation to which our company is subject, a legal obligation serves as the legal basis. If processing is necessary to protect a legitimate interest of our company or a third party and if the interests, fundamental rights and freedoms of the data subject do not outweigh the first-mentioned interest, legitimate interest serves as the legal basis for the processing. Below you can find a simplified overview along with some explanation.

**Consent** – This is where we have asked you to provide explicit permission to process your data for a particular purpose.

**Contract** – This is where we process your information to fulfil a contractual arrangement, we have made with you.

**Answering your business enquiries** – This is where we process your information to reply to your messages, e-mails, posts, calls, etc.



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**Legitimate Interests** - This is where we rely on our interests as a reason for processing, generally this is to provide you with the best products and service in the most secure and appropriate way. Of course, before relying on any of those legitimate interests we balance them against your interests and make sure they are compelling enough and will not cause any unwarranted harm.

**Legal Obligation** – This is where we have a statutory or other legal obligation to process the information, such as for the investigation of crime.

### *Other Data Protection Principles*

#### **Do Not Track**

Do Not Track is a privacy preference you can set in most browsers. We support Do Not Track because we believe that you should have genuine control over how your info gets used and our site responds to Do Not Track requests.

#### **Do Not Sell My Personal Information**

We do not sell information that directly identifies you, like your name, address, banking information, or phone records. In fact, we do not even share that type of information except with service providers who can use the information solely to provide a service on our behalf, when a consumer directs us to share the information. If applicable, you can choose whether you want this sharing or not. Remember, we don't sell data that directly identifies you unless we have your explicit permission, no matter what choice you make. To make your choices, please contact us.

#### **Accuracy**

It is important that the data we hold about you is accurate and current, therefore please keep us informed of any changes to your personal data.

#### **Automated decision-making and profiling**

We do not use automation for decision-making and profiling.

#### **Children's Privacy**

CyberSecurityEasy does not knowingly collect personal data from children under the age of 18.

Our Services are intended for a general audience and are not intended for and should not be used by children under the age of 16.

We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Privacy Policy by instructing their children never to provide personal data on the website without their permission. If you have reason to believe that a child under the age of 18 has provided personal data to CyberSecurityEasy through the website, please contact us at [info@CyberSecurityEasy.com](mailto:info@CyberSecurityEasy.com). We will endeavor to delete that information from our databases and other stores as soon as reasonably practicable.

### *Collection and processing of personal data*

#### **How do we collect your data?**

On the one hand, your data is collected by you providing it to us. This may, for example, be data that you enter in a contact form. On the other hand, data is collected automatically by our IT systems when you visit the website. This is mainly technical data (e.g. internet browser, operating system or time of page view). This data is collected automatically as soon as you enter our website.



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## **What are the categories of data subjects?**

Customers, interested parties, visitors and users of the online offer, business partners. Visitors and users of the online offer. In the following, we refer to the data subjects collectively as "users".

## **What are the purposes for processing?**

- Provision of the online offer, its contents and functions.
- Provision of contractual services, service and customer care.
- Answering contact enquiries and communication with users.
- Marketing, advertising and market research.
- Security measures.
- Advertisement

## **When you merely browser our website**

When you access our web site, information is collected. This includes, for example, the type of web browser, the operating system used, the domain name of your internet service provider and similar. usage data is transmitted by the respective internet browser and stored in log files, the so-called server log files, such as the date and time of access, the name of the page accessed, the volume of data transferred and the requesting provider. This is exclusively information that does not allow any conclusions to be drawn about your person. This information is technically necessary in order to correctly deliver the contents of web sites requested by you and is mandatory when using the Internet. Anonymous information of this kind is statistically evaluated by us to optimize our Internet presence and the technology behind it.

## **Cookies**

Like many other web sites, we also use so-called "cookies". Cookies are small text files that are transferred from a website server to your hard drive. This automatically provides us with certain data such as IP address, browser used, operating system about your computer and your connection to the Internet. Cookies cannot be used to run programs or deliver viruses to a computer. The information contained in cookies enables us to facilitate your navigation and to display our web sites correctly. Under no circumstances will the data we collect be passed on to third parties or linked to personal data without your consent. For further Information please review our Cookie Policy.

## **SSL encryption**

To protect the security of your data during transmission, we use state-of-the-art encryption procedures (e.g., SSL) via HTTPS.

## **Newsletter**

We send newsletters, e-mails and other electronic notifications with promotional information via MailChimp and only with the consent of the recipients or a legal permission. Apart from that, our newsletters contain information about our products, offers, promotions of CyberSecurityEasy and our advertisers. Registration for our newsletter takes place in a so-called double opt-in procedure. This means that after registration you will receive an e-mail in which you are asked to confirm your registration. This confirmation is necessary so that no one can register with other email addresses. The registrations for the newsletter are logged in order to be able to prove the registration process in accordance with the legal requirements. This includes the storage of the registration and confirmation time as well as the IP address.

Your data will be transferred to MailChimp for the purpose of sending the newsletter. If you do not wish to receive any more newsletters from us at a later date, you can object to this at any time without incurring any costs other than the transmission costs according to the basic tariff. You will find a link to this effect in every newsletter. You can also inform us of your wish to do so using the contact option provided at the end of this privacy policy.

## **Contacting Us**



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If you contact us by e-mail or contact form, the information you provide will be stored for the purpose of processing the enquiry and for possible follow-up questions. Your data provided will not be used for any other purposes, in particular not for advertising.

### *When do we disclose your Personal Data?*

We may share your information with organizations that help us provide the services described in this policy and who may process such data on our behalf and in accordance with this policy, to support our online offer and our services. Typically, and unless otherwise stated in this policy, data may be shared on the basis of our contractual and pre-contractual obligations. Equally, if you have consented to it, or where there we have a legal obligation to do so or on the basis of our legitimate interests (e.g., when using agents, hosting providers, tax, business and legal advisors, customer care, accounting, billing and similar services that allow us to perform our contractual obligations, administrative tasks and duties efficiently and effectively). If we commission third parties to process data on the basis of a so-called "processing agreement".

In relation to metadata obtained about you, we may share a cookie identifier and IP data with analytic service providers to assist us in the improvement and optimization of our website which is subject to our Cookies Policy.

We may also disclose information in other circumstances such as when you agree to it or if the law, a Court order, a legal obligation or regulatory authority ask us to. If the purpose is the prevention of fraud or crime or if it is necessary to protect and defend our right, property or personal safety of our staff, the website and its users.

We may transfer your personal information outside the United States. For example, our Websites are hosted on servers within Europe and the United States of America, and our third party service providers operate around the world. We will only transfer your personal information outside the United States if adequate protection measures are in place. To ensure that your personal information does receive an adequate level of protection outside the EEA we model contractual clauses and standard contractual clauses and processing agreements.

### *Data retention*

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, the data processed by us will be deleted or restricted in their processing. If the data is not deleted because they are required for other and legally permissible purposes, their processing is restricted. This means that the data is blocked and not processed for other purposes. This applies, for example, to data that must be retained for commercial or tax law reasons.

### *How do we protect your Personal Data?*

We protect your data using state-of-the-art technical, and physical safeguards and operate a firm system of policies, confidentiality agreements, digital safeguards and procedures to ensure the highest level of administrative protection. The data we collect from you may be stored, with appropriate technical and organizational security measures applied to it, on our servers. In all cases, we follow generally high data protection standards and advanced security measures to protect the personal data submitted to us, both during transmission and once we receive it.

### **Google Analytics**

This web site uses Google Analytics, a web analytics service provided by Google, Inc. (hereinafter: Google). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how users use the site. The information generated by the cookie about your use of the web site will be transmitted to and stored by Google on servers in the United States.



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However, due to the activation of IP anonymization (see also below) on these web sites, your IP address will be truncated beforehand by Google within Member States of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. On behalf of the operator of this website, Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity and providing other services relating to website activity and internet usage to the website operator.

The IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data. You may refuse the use of cookies by selecting the appropriate settings on your browser; however, please note that if you do this you may not be able to use the full functionality of this web site. You can also prevent the collection of data generated by the cookie and related to your use of the web site (including your IP address) by Google and the processing of this data by Google by downloading and installing the browser plug-in available at the following link: [Browser add-on to deactivate Google Analytics](#).

In addition or as an alternative to the browser add-on, you can prevent tracking by Google Analytics on our pages by clicking on this link. This will install an opt-out cookie on your device. This will prevent the collection by Google Analytics for this website and for this browser in the future, as long as the cookie remains installed in your browser.

Please note that this website uses Google Analytics with the extension "\_anonymizeIp()" and that IP addresses are therefore only processed in abbreviated form in order to exclude direct personal references.

## **YouTube**

We embed YouTube videos on some of our web sites. The operator of the corresponding plugins is YouTube, LLC, 901 Cherry Ave, San Bruno, CA 94066, USA. When you visit a page with the YouTube plugin, a connection to YouTube servers is established. This tells YouTube which pages you are visiting. If you are logged into your YouTube account, YouTube can assign your surfing behavior to you personally. You can prevent this by logging out of your YouTube account first.

If a YouTube video is started, the provider uses cookies that collect information about user behavior.

If you have deactivated the saving of cookies for the Google Ad program, you will not have to expect any such cookies when watching YouTube videos. However, YouTube also stores non-personal usage information in other cookies. If you wish to prevent this, you must block the storage of cookies in your browser.

## **Economic Analyses and Market Research**

In order to run our business economically, to identify market trends, customer and user wishes, we analyze the data available to us on business transactions, contracts, inquiries, etc. In doing so, we process inventory data, communication data, contract data, payment data, usage data, metadata on the basis of our legitimate interest whereby the persons concerned include customers, interested parties, business partners, visitors and users of the online offer. The analyses are carried out for the purposes of business management evaluations, marketing and market research.

In doing so, we may take into account the profiles of registered users with details, for example, of their purchasing transactions. The analyses serve us to increase user-friendliness, to optimize our offer and business efficiency and are not disclosed externally unless they are anonymous analyses with summarized values.

If these analyses or profiles are personal, they will be deleted or made anonymous upon termination by the user, otherwise after two years from the conclusion of the contract. In all other respects, the macroeconomic analyses and general trend determinations are prepared anonymously wherever possible.





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## **Advertising**

Advertisers and third parties also may collect information about your activity on our sites and applications, on devices associated with you, and on third-party sites and applications using tracking technologies. Tracking data collected by these advertisers and third parties is used to decide which ads you see both on our sites and applications and on third-party sites and applications. You can opt out on the [Digital Advertising Alliance \(DAA\)](#) if you wish not to receive targeted advertising. You may also be able to choose to control targeted advertising on other websites and platforms that you visit. In addition, you may also choose to control targeted advertising you receive within applications by using the settings and controls on your devices.

## **Social media plugins**

We offer you the option of using so-called "social media buttons" on our web site. This means that these buttons are only integrated on the web site as a graphic that contains a link to the corresponding web site of the button provider. By clicking on the graphic, you are thus redirected to the services of the respective provider. Only then will your data be sent to the respective providers. If you do not click on the graphic, there is no exchange between you and the providers of the social media buttons. Information about the collection and use of your data in the social networks can be found in the respective terms of use of the corresponding providers.

## *Miscellaneous*

### **Direct marketing**

From time to time we may use the personal information we collect from you to identify particular services which we believe may be of interest to you. We may contact you to let you know about these products and services and how they may benefit you.

You may give us your consent in a number of ways including by selecting a box on a form where we seek your permission to send you marketing information, or sometimes your consent is implied from your interactions or relationship with us. Where your consent is implied, it is on the basis that you would have a reasonable expectation of receiving marketing communication based on your interactions or relationship with us.

Direct Marketing from generally takes the form of e-mail but may also include other less traditional or emerging channels. These forms of contact will be managed by us, or by our contracted service providers. Every directly addressed marketing form sent or made by us or on our behalf should include a means by which customers may unsubscribe (or opt-out) from receiving similar marketing in the future.

### **Hosting**

The services for hosting and displaying the website are partly provided by our service providers as part of processing on our behalf. Unless otherwise explained in this privacy policy, all access data and all data collected in forms provided for this purpose on this website are processed on their servers. If you have any questions about our service providers and the basis of our relationship with them, please contact them as described in this privacy policy.

### **Content Delivery Network**

For the purpose of a shorter loading time, we use a so-called Content Delivery Network ("CDN") for some offers. With this service, content (e.g., large media files) are delivered via regionally distributed servers of external CDN service providers. Therefore, access data is processed on the servers of the service providers. Our service providers work for us within the framework of order processing. If you have any questions about our service providers and the basis of our cooperation with them, please use the contact option described in this privacy policy.

### **Data Breaches and Notification**





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Databases or data sets that include Personal Data may be breached inadvertently or through wrongful intrusion. Upon becoming aware of a data breach, CyberSecurityEasy will notify all affected individuals whose Personal Data may have been compromised, and the notice will be accompanied by a description of action being taken to reconcile any damage as a result of the data breach. Notices will be provided as expeditiously as possible after which the breach was discovered.

## **Confirmation of Confidentiality**

All company employees must maintain the confidentiality of Personal Data as well as company proprietary data to which they may have access and understand that such Personal Data is to be restricted to only those with a business need to know. Employees with ongoing access to such data will sign acknowledgment reminders annually attesting to their understanding of this company's requirements.

## *Changes, Complaints, Contact and Closing*

### **Changes**

This policy and our commitment to protecting the privacy of your personal data can result in changes to this policy. Please regularly review this policy to keep up to date with any changes. We reserve the right, in its sole discretion, to update and amend all or parts of this Privacy Policy, at any time. The version published on the Site is the version actually in force.

### **Queries and Complaints**

Any comments or queries on this policy should be directed to us by emailing us at [info@CyberSecurityEasy.com](mailto:info@CyberSecurityEasy.com). If you believe that we have not complied with this policy or acted otherwise than in accordance with data protection law, then please contact us.

### **Closing**

We would like to point out that data transmission on the Internet (e.g., communication by e-mail) can have security gaps. Complete protection of data against access by third parties is not possible.

### **Contact Us:**

Email: [info@CyberSecurityEasy.com](mailto:info@CyberSecurityEasy.com)

[www.CyberSecurityEasy.com](http://www.CyberSecurityEasy.com)

Phone number: 847-845-9360

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