

# Delphi Sales Consulting, LLC

## Privacy Statement Rev. Sept 2022

Across Delphi Sales Consulting we are fully committed to safeguarding your privacy. Whether you are engaging with us as a research or consulting client or a prospective client, as a research partner or as a research participant, we deploy robust data privacy systems and practices to ensure your research data and your personal data are respected and protected.

We will never share personal information or use it for any other reason other than which it was intended.

Wherever in the world we engage with you or conduct marketing research, we strictly adhere to the privacy laws and marketing research codes of conduct for that country.

Delphi Sales Consulting will not transfer personal information to a country or territory outside the United States or the European Economic Area unless that territory or country ensures an adequate level of protection for the rights and freedoms of data subjects.

Delphi Sales Consulting companies have implemented appropriate technical and organizational measures to meet all applicable laws, regulations, and regulatory guidance in relation to the processing or protection of personal information relating to a resident of the European Union or otherwise subject to protection under the laws of the European Union and its Member States, as amended from time to time, including but not limited to, Regulation (EU) 2016/679 of 27 April 2016, General Data Protection Regulation (GDPR).

Our Privacy Policies below set out how we will treat your Personal Information.

## Purpose

This privacy policy focuses on our data protection commitment to active and prospective marketing research clients and how we collect, store and process and transfer personal information for our direct marketing and communication purposes. (For our policy relating to marketing research, please see our [Marketing Research Privacy Policy](#).)

# Personal Information that is collected

## Information you submit

When you complete a form on our website or contact us to request a bid we ask you to provide your basic contact information.

When we meet you at an event or a private meeting, we invite you to provide your basic contact information.

When you confirm a project with us, we then ask you to provide billing information.

We retain any information collected in voluntary client surveys and feedback questionnaires.

## Cookies & Other Tracking Technology

Delphi Sales Consulting and our analytics provider use standard internet technology such as cookies and Web beacons, 'tag' and 'scripts' as navigational information to track interactions with our websites on an individual and aggregated basis.

Our website and newsletters may include social media features, such as the 'Share' button. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function. Social media features and widgets are hosted by a third party. Your interactions with these features are governed by the privacy policy of the social media company providing it.

## Children

The website is not intended for or targeted at children under the age of 16. And we do not knowingly or intentionally collect data about children under 16. If you believe we have collected information about a child under 16, please contact us at [gdichiara@delphisales.com](mailto:gdichiara@delphisales.com) so that we may delete the information.

## International Transfer of Personal Information

When you submit Personal Information, it is transferred to the United States to facilitate our global operations, and you hereby consent to such transfer which is protected in accordance with GDPR law. Your Personal Information may also be stored and processed in any country in which we engage service providers. Your data will be subject to the data transfer rules of that country and this privacy policy will still apply.

## How Personal Information is stored

Your information is stored in our database in the United States. Our project management and accounting software is used to process information from this system and is in turn governed by system security and strict data protection protocols.

Delphi Sales Consulting uses robust organizational, technical, and administrative measures to protect personal information within our company. This includes security controls to prevent unauthorized access to our systems. While we take reasonable steps to secure your personal information, please be aware that no transmission or security system is guaranteed to be 100% secure from intrusion or hacking, and there is always some risk assumed by sharing Personal Information online. If you have reason to believe that your interaction with us is no longer secure, please notify us immediately at [gdichiara@delphisales.com](mailto:gdichiara@delphisales.com).

## How Personal Information Is Used

Delphi Sales Consulting uses the information you provide to communicate with you to help provide these services you request from us.

We may use this information to provide you with additional personalized information about company and partner news, services, promotions, events, and content that we believe may be of interest to you.

If you provide us Personal Information about yourself or others, or if others give us your information, we will never share or sell that information for commercial purposes. We will only use that information for the specific reason for which it was provided to us.

### **Information processors**

We may provide your Personal Information to companies that provide services to help us with our business activities such e.com/munication processing or payment processing. These companies are authorized to use your Personal Information *only as necessary to provide* these services to us.

### **Website**

Delphi Sales Consulting may use information collected to improve its websites and services and personalize your experience on our website and our communications so you don't have to re-enter lots of information.

### **Testimonials**

If you share a testimonial with us, with your permission we may post this on our website. You can update or remove your testimonial at any time by contacting us at [gdichiara@delphisales.com](mailto:gdichiara@delphisales.com).

### **Links to other Websites**

Our website may include links to other websites whose privacy practices may differ from our own. Any Personal Information you submit to those sites is governed by their privacy policies. We recommend you read the privacy policy of any website you visit.

### **Changes in Ownership**

If our company or our assets are acquired by another company, that company would receive all information collected by Delphi Sales Consulting. In such an event, you would be notified by email or a prominent notice on our website of any changes of ownership, uses of your Personal Information, and choices you have relating to your preferences.

### **Compelled Disclosure**

We reserve the right to disclose your Personal Information if required by law or if we believe use or disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud or comply with a law, court order, or legal process.

### **Communication of Preferences**

We invite our clients and contacts in Europe to consent or not consent to receive marketing communications from Delphi Sales Consulting companies.

Every marketing email contains information for users in any country on how to opt out of future marketing and non-transactional communications.

Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our website, but your ability to use some features or areas of our website may be restricted.

You may contact us to update or change your information.

You may request access to your information or request for your information to be deleted.

### How to Contact Us Regarding Your Privacy

If you wish to contact us about any matter relating to client privacy, you may contact us at [gdichiara@delphisales.com](mailto:gdichiara@delphisales.com) or write to us at Delphi Sales Consulting, 995 Dogwood Trail, Franklin Lakes, NJ 07417. USA. Attention: Privacy Officer.

### Changes to this Policy

We may update this privacy policy to reflect changes to our information practices. We encourage you to periodically review this page for the latest information on our privacy practices to ensure they still meet with your approval.

## ***Mission statement to protect HCP, health information and business information privacy***

Delphi Sales Consulting is committed to the protection and safeguarding of personal data collected from persons who are HCPs, relating to practice information and (c) business individuals or entities relating to business information.

Privacy is an especially important issue for marketing research and opinion research since we may be contact with consumers, patients and business persons from time to time. In this regard, we often obtain confidential information from such persons. (“Personally Identifiable Information or PII”). In order to protect the company and our Respondents and comply with legal requirements such as the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”), the Child Online Privacy and Protection Act (“COPPA”) and other relevant statutes and regulations, it is important to us that we are aware of and comply with our Privacy Policy and Principles when handling PII.

## **PRIVACY & DATA PROTECTION**

In order to fulfill our Mission Statement to Protect Consumer, Health

Information and Business Information Privacy, Delphi Sales Consulting companies adhere to the following policies:

1. All PII obtained shall be lawfully collected, compiled, stored, allowed access to, processed and utilized by Delphi Sales Consulting
2. Participation in all research projects is voluntary and respondents may opt out of any research project, at any time. In addition, consent will be obtained prior to the collection of PII that will be recorded.
3. All PII obtained shall be treated confidentially, shall be used for research purposes only and shall not be disclosed to any person not employed by Delphi Sales Consulting companies, except with consent, as required by law or by court order.
4. All PII obtained shall not be disclosed to any client other than for lawful research purposes. In this regard, in general, clients will not receive (a) the last name or telephone number of any recruited Respondent for any research study; (b) any original screeners or sign-out sheets containing any last names or telephone numbers. Further, clients are bound by Schlesinger's Privacy Policy and any such information shared with clients will be used for marketing research and opinion research purposes only.
5. Delphi Sales Consulting companies adhere to the policy laws of all countries in which we manage research.
6. Delphi Sales Consulting companies will not transfer personal data to a country or territory outside the U.S. or the European Economic Area unless that territory or country ensures an adequate level of protection for the rights and freedoms of data subjects.
7. Delphi Sales Consulting companies adhere to research industry Codes and Standards relating to the USA and additionally the country in which each Delphi Sales Consulting project is executed.
8. Delphi Sales Consulting companies comply with all pertinent Federal and State laws governing privacy, including but not limited to the recently enacted California Consumer Privacy Act (CCPA).

### **Updating your personal information**

To request that we correct or update any of your Personal Information, you can contact us at [gdichiara@delphisales.com](mailto:gdichiara@delphisales.com)

### **Accessing your Personal Information**

If you wish to request access to your personal information which we may hold, you may contact us at [gdichiara@delphisales.com](mailto:gdichiara@delphisales.com).

**Delphi Sales Consulting utilizes standard contractual clauses to comply with privacy and security requirements of GDPR.**

**THESE ARE OUR PROMISES TO YOU:**

1. **Notice.** When we collect your personal information, we'll give you timely and appropriate notice describing what personal information we're collecting, how we'll use it, and the types of third parties with whom we may share it.
2. **Choice.** We'll give you choices about the ways we use and share your personal information, and we'll respect the choices you make. Upon registration, you will be asked for contact and demographic information and will be asked about topics such as health, technology and business
3. **Access.** We'll provide ways for you to access your personal information, as required by law, so you can correct inaccuracies.
4. **Security.** We'll take appropriate physical, technical, and organizational measures to protect your personal information from loss, misuse, unauthorized access or disclosure, alteration, and destruction.
5. **Enforcement.** We'll regularly review how we're meeting these privacy promises, and we'll provide an independent way to resolve complaints about our privacy practices.
6. **Accountability.** We may share Personal Data with third-party providers we have retained to perform services on our behalf. We'll include provisions in our contracts with third parties to whom EU personal data will be disclosed that the data may only be processed for the limited and specified purposes consistent with the consent provided by you and that the third party will provide the same level of protection as the Delphi Sales Consulting. We will require third parties to whom we disclose Personal Data to contractually agree to provide at least the same level of protection for Personal Data as Delphi Sales Consulting. If the third party does not comply with its privacy obligations, Delphi Sales Consulting may choose to, where appropriate, take steps to prevent or stop the use or disclosure of Personal Data.
7. **Data Integrity and Limitations.** We'll collect only as much personal information as we need for specific, identified purposes, and we won't use it for other purposes without obtaining your consent. We'll take appropriate steps to make sure the personal information in our records is accurate.
8. **Recourse.** We'll address any disagreements regarding potential misuse of data and have policies & procedures in place to investigate and resolve disputes.