

TENSOR RISK CONSULTING, LLC Privacy Policy

Updated: January 17, 2024

Thank you for visiting Tensor Risk Consulting, LLC (“Tensor Risk”). This Privacy Policy describes the personal data handling policies of Tensor Risk as a data controller, including the following:

1. What personal data we collect, including from Tensor Risk’s online applications, services and our website at <https://tensorrisk.com> (collectively, the “Services”);
2. How we use the data;
3. With whom we may share the personal data;
4. Legal basis for processing the data;
5. Storage and security of your data;
6. Your Privacy Rights, Choices and Disclosures, including those for Europe and California;
7. Users outside the United States; and
8. Links to other sites;
9. Privacy Policy updates; and
10. Contact Information.

1. Personal Data We Collect or Process

- (a) The Services capture some information about you automatically utilizing background local storage and session storage technologies (“Cookies”). Cookies are small files or other pieces of data which are downloaded or stored on your computer or other device, that can be tied to information about your use of the Services (including certain third party services and features offered as part of our website). Examples of information of this type are your IP address, the browser you are using, the operating system you are using, the pages on the website that you visit and details of your transaction activity, such as the amount, date and time for each transaction. When we use Cookies, we may use “session” Cookies that last until you close your browser or “persistent” cookies that last until you or your browser delete them. You may change your browser setting to decline the use of Cookies.

We use GoDaddy to host our website. For more information on GoDaddy’s data handling practices, please review their privacy policy. The information regarding your use of this website that is generated by the cookie (including your truncated IP address) is transferred to a Google server in the United States and stored there. Google will use this information to analyze your use of the Services, compile reports on activity for us, and perform further services associated with website use and Internet use. Google may also transmit this information to third parties where required by law or to the extent that third parties process these data on behalf of Google. You can deactivate Google Analytics using a browser add-on if you do not wish the analysis to take place. You can download the add-on here: <https://tools.google.com/dlpage/gaoptout?hl=en>.

We operate social media pages on third party networks and we may provide have social media icons on our website. When you visit or link to our social media pages, data is processed both by us and the applicable social media provider. Social media providers are unaffiliated with us, and we are not responsible for the content or privacy practices of social media providers. Social media providers have their own terms of use and privacy policies, and we encourage you to review those policies whenever you visit their websites or interact with their platforms.

We may use third-party companies to help us tailor website content to users or to serve ads or messages on our behalf. These companies may employ cookies and web beacons to measure advertising or messaging effectiveness (such as which web pages are visited, which messages are responded to, or what products are purchased and in what amount). Any information that these third parties collect via cookies and web beacons is not linked (by them) to any personal information collected by us. There are opt-out tools available to you at www.aboutads.info/choices and www.networkadvertising.org/choices (U.S.-based) and www.youronlinechoices.com (Europe-based).

- (b) We also collect information that you provide to us voluntarily or otherwise authorize us to obtain through one of your social media or address book accounts, including but not limited to LinkedIn and Twitter. Tensor Risk collects the information that you provide to us when you sign up to receive newsletters, advisories, announcements and invitations, and contact us by email. This information includes your name, email address and mobile phone number. If you purchase any products or services from Tensor Risk, please note that we do not currently process payments through our website. Providing any information to us is completely voluntary. **Please do not submit to us any sensitive personal information.**

We do not knowingly collect information from users of our Services under the age of 18 and/or their internet usage, and such persons are not authorized to use the Services. By using the Services, you represent that you are at least 18 years old and consent to the application of U.S. law, to the extent it applies to your activities on this site. You also represent, by accessing or using the Services, that you are of legal age to enter into legal agreements.

2. How We Use the Data

We use the personal data we collect to respond to your inquiries, complete offline any transactions you initiate, provide or enhance the Services you request, perform our contractual obligations, provide updates and other important information related to your activity on and with the Services, inform you of new services or changes in Services, administer the Services, fill employment positions, enter into contracts for services, to fulfill legal obligations we have to governmental authorities or other third parties, and for other legitimate business purposes. You will have the opportunity to opt out of any electronic marketing communications you may receive from us.

This link briefly explains the CAN-SPAM requirements <https://www.ftc.gov/tips-advice/business-center/guidance/can-spam-act-compliance-guide-business>. They include (1) not using any misleading header (To/from) or subject line text, (2) identifying the communication as an ad (“This is a marketing communication”), (3) instructing how to opt out, and (4) listing your physical address.]

3. With Whom We Share Personal Data

Tensor Risk is a provider of services headquartered in the United States, and may have to share your personal data to third parties (within or outside your country of residence) who perform services on our behalf, including without limitation our website hosting provider, technology providers and professional advisors. As stated above, we do not currently process any payments through our website. Users are instructed to refrain from providing any payment information through our website.

Tensor Risk may disclose any information we have about you (including your identity) if we determine that such disclosure is necessary in connection with any investigation or complaint regarding your use of the Services, or to identify, contact or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) Tensor Risk's rights or property, or the rights or property of visitors to or users of the Services. Tensor Risk reserves the right at all times to disclose any information that we deem necessary to comply with any applicable law, regulation, legal process or governmental request. Tensor Risk also may disclose your information when we determine that applicable law requires or permits such disclosure, including exchanging information with other companies and organizations for fraud protection purposes.

Your information may be transferred to another company (within or outside your country of residence) in connection with a merger or in the event that our business is acquired in whole or part by another company.

We may share aggregated and de-identified information with third parties (within or outside your country of residence) for analytical, research or other similar purposes.

Tensor Risk may obtain your written consent from time to time in electronic form by using online agreements or other acknowledgements on the Services, including for any other contemplated uses of your personal data not addressed in this Privacy Policy. Please read all online agreements carefully before accepting them.

4. Grounds for Using Your Personal Data [GDPR]

We rely on the following legal grounds to process your personal information:

Consent. Some uses of your personal data as described in this Privacy Policy are subject to your consent, such as marketing email communications. To withdraw your consent, please contact us at michael@tensorrisk.com. You may also refrain from providing, or withdraw, your consent for Cookies via your browser and mobile settings.

Performance of a contract. We may need to collect and use your personal information to enter into a contract with you and to perform Services that you request.

Legitimate Interests. We may use your personal information for our legitimate interests to provide our Services and to improve our Services and the content contained thereon. We may use technical information as described in this Privacy Policy and use personal information for our marketing purposes consistent with our legitimate interests and any choices that we offer or consents that may be required under applicable law.

Compliance with Legal Obligations. We may use your personal information as necessary to comply with our legal obligations.

5. Storage and Protection of Your Personal Data

We retain the personal data we collect for so long as reasonably necessary to fulfill the purposes for which the data was collected and to perform our contractual and legal obligations. Notwithstanding the generality of the foregoing, we store email addresses until the user requests to be unsubscribed or removes themselves through any self-service tools offered to the user.

We do not process any payments on this website and you should not submit any payment information through this website.

We take reasonable administrative, physical and technical precautions to protect your personal data and communications between us. This includes, when required or as we deem appropriate and feasible under the circumstances, dual authentication, encryption and written commitments from third parties that may have access to your data that they will protect the data with safeguards that are substantially equivalent to those used by Tensor Risk.

No Internet or e-mail transmission is ever fully secure or error free, however. We therefore cannot guarantee absolute security of your data, and we are not responsible for processes and networks that we do not control. Users assume the risk of security breaches and the consequences resulting from them. Please be careful in deciding what information you send to us via email or over the Internet.

6. Your Rights, Choices and Disclosures

(a) General. This section is subject to specific disclosures on privacy rights set forth below. We are committed to facilitate the exercise of your rights granted by the laws of your jurisdiction, which may include the right to request the correction, modification or deletion of your personal information and the right to opt out of the sale of your personal information (as applicable). We will do our best to honor your requests subject to any legal and contractual obligations. If you would like to make a request, cancel your account or request we delete or no longer use your account information to provide you Services, contact us at michael@tensorrisk.com or make changes to any user profile information connected to your account.

You may opt out of receiving electronic marketing communications from us by clicking on the “unsubscribe” link on the communication or contacting us at michael@tensorrisk.com. Some non-marketing communications may not be subject to a general opt-out, such as communications about transactions, disclosures to comply with legal requirements, software updates and other support-related information. If you do not wish to receive any service-related emails from us, you have the option to deactivate your account.

Subject to local law, you may have additional rights under the laws of your jurisdiction regarding your personal data, such as the right to complain to your local data protection authority.

You may be able to disable Cookies through your browser settings, but if you delete or disable Cookies, you may experience interruptions or limited functionality in certain areas of the Services.

(b) Your European Privacy Rights and Choices. If you reside or otherwise find yourself in the territory of Europe, your privacy rights under the European data protection law include:

- Transparency and the right to information. Through this policy we explain how we use and share your information. However, if you have questions or need additional information you can contact us any time.
- Right of access, restriction of processing, erasure. You may contact us to request information about the personal data we have collected from you and to request the correction, modification or deletion of such personal information, which requests we will do our best to honor subject to any legal and contractual obligations.
- Right to withdraw your consent at any time. When we process your personal data based on your consent, you have the right to withdraw it at any time.
- Right to object at any time. You have the right to object at any time to receiving marketing or promotional materials from us by either following the opt-out instructions in commercial e-mails or by contacting us, as well as the right to object to any processing of your personal data based on your specific situation. In the latter case, we will assess your request and provide a reply in a timely manner, according to our legal and contractual obligations. Some non-marketing communications are not subject to a general opt-out, such as communications about transactions and disclosures to comply with legal requirements.
- Right to data portability. You have the right to data portability of your own personal data by contacting us.
- Right not to be subject to an automated decision, including profiling. We do not make automated decisions using your personal data that may negatively impact you.
- Right to lodge a complaint with a supervisory authority. If you consider that the processing of your personal data infringes your privacy rights according the European Privacy regulation, you have the right to lodge a complaint with a supervisory authority, in the member state of your habitual residence, place of work, or place of the alleged infringement.

To make a request or to ask us a question about our data practices, please contact us via email at michael@tensorrisk.com.

(c) California Disclosures

California “Shine the Light” Information-Sharing Disclosure: California residents may request a list of all third parties with respect to which we have disclosed any information about you for direct marketing purposes and the categories of information disclosed. If you are a California resident and want such a list, please send us a written request by email to michael@tensorrisk.com with “California Shine The Light Rights” in the subject line.

California Do Not Track Disclosure: Our website hosting provider uses reasonable efforts to honor Do Not Track browser settings. However, at this time, there is no worldwide uniform or consistent industry standard or definition for responding to, processing, or communicating Do Not Track signals.

California Consumer Privacy Act. Tensor Risk is not a “business” subject to the California Consumer Privacy Act.

7. Users Outside the United States

Tensor Risk and the Services are controlled and operated from the United States. If you are an individual from the European Union, Canada or any other jurisdiction with laws or regulations governing personal data collection, use, and disclosure that differ from United States laws, please be advised that we may store the information we collect in the United States which is not deemed an “adequate jurisdiction” by the European regulatory authorities. Personal data may also be transferred from the country of your residence to other countries, including the United States.

8. Links to Other Sites

Our Services may contain links to other websites for your convenience or information. These websites may be operated by companies unaffiliated with Tensor Risk, and we are not responsible for the content or privacy practices of those websites. Linked websites may have their own terms of use and privacy policies, and we encourage you to review those policies whenever you visit the websites.

9. Privacy Policy Changes

We may update this Privacy Policy from time to time and without prior notice to you to reflect changes in our information practices, and any such amendments shall apply to information already collected and to be collected. Your continued use of the Services after any changes to our Privacy Policy indicates your agreement with the terms of the revised Privacy Policy. Please review this Privacy Policy periodically and especially before you provide personal data to us. If we make material changes to this Privacy Policy, we will notify you here, by email or by means of a notice on our home page. The date of the last update of the Privacy Policy is indicated at the top of this Privacy Policy.

10. Questions and Contact Information

Please contact us if you have any questions about our Privacy Policy. You may contact us by emailing us at michael@tensorrisk.com.