



# PRIVACY POLICY

Privacy Statement Effective August 15, 2023.

Welcome to Sweet Grass Consulting, LLC (SGC). SGC is a consulting firm specializing in research and evaluation, strategy development, and impact assessment.

In Part I of this Privacy Statement we set forth SGC's Privacy Policy as to Personal Information which we collect online through [www.sweetgrassconsulting.net](http://www.sweetgrassconsulting.net), referred to herein as "SGC website".

In Part II of this Privacy Statement we set forth SGC's Privacy Policy as to Personal Information which we collect other than through the SGC website.

"Personal Information", is any information that enables us to identify you, directly or indirectly, by reference to an identifier such as your name, identification number, location data, online identifier or one or more factors specific to you. Personal Information includes "sensitive Personal Information" and "pseudonymised Personal Information" but excludes anonymous information or information that has had the identity of an individual permanently removed.

**Your use of the SGC website and/or provision of your Personal Information or sensitive Personal Information to SGC constitutes your consent to the use, storage, processing and transfer of that information in accordance with this Privacy Statement.**

For the purposes of the EU General Data Protection Regulation 2016/679 (the "GDPR"), except as otherwise expressly stated, the data controller is Sweet Grass Consulting, LLC with an office at 1501 Cleveland Avenue, Loveland, Colorado 80538. SGC is an organization based in the United States.

## QUESTIONS

If you have any questions or complaints regarding this Privacy Statement, please contact us at [directors@sweetgrassconsulting.net](mailto:directors@sweetgrassconsulting.net). If you have any questions about the SGC website, please contact us at [directors@sweetgrassconsulting.net](mailto:directors@sweetgrassconsulting.net), by phone at 970-412-5836 or send a letter to:

Sweet Grass Consulting, LLC  
1501 Cleveland Avenue  
Loveland, CO 80538

## CHANGES TO THIS PRIVACY STATEMENT

We will update this Privacy Statement from time to time, so please check back periodically.

If at any point we decide to use Personal Information in a manner that is materially different from that stated at the time it was collected, we will endeavor to notify you of such changes (e.g., we will post a revised Privacy Statement with a new effective date, display the word "updated" next to the Privacy Policy link on each page on the SGC website, or otherwise notify you as appropriate) prior to implementing them.



## **PART I – SGC WEBSITE PRIVACY POLICY**

Throughout the SGC Website, there are forms for visitors to request information and services, and to apply to various SGC programs. We use Personal Information from these forms to provide the services, promotional materials, or proposals you request, or assess the applications that you submit.

There are no forms on the SGC website that request financial information in order to bill you for products or services ordered. SGC does not store credit card information for any purposes. Unique identifiers (such as your email) may be collected from website visitors to verify the user's identity for access to restricted content or features on the SGC website.

This Privacy Policy discloses SGC's privacy practices and contains detailed information about the following:

- What information do we collect?
- What are "cookies" and how does SGC use them?
- Do we share information with third parties?
- How do we use the information we collect?
- How can you review and modify your Personal Information?
- What is the opt-out policy for the SGC website?
- Your California privacy rights
- Your European privacy rights
- What types of security procedures are in place to protect against the loss, misuse or alteration of your information?
- How does the SGC website use bulletin boards, discussion lists, and moderated chats?

### **1. What information do we collect?**

The SGC website collect the following Personal Information about site visitors:

#### **a) Site Use Information**

SGC collects technical information relating to each time a visitor comes to the SGC website, including IP address, browser type and version, time zone settings, browser plug-in types and versions, operating system and platform type (e.g. Internet Explorer browser on a Windows platform).

We may also collect information about your visit, including pages you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

Gathering this technical information helps us to learn what browsers we need to support and helps us determine what sections of the SGC website are most popular and how many visitors come to our site(s). You do not have to register with the SGC website before we can collect this information.

#### **b) Information Provided to SGC**

You may provide Personal Information to us which may include your name, home and/or work email address, postal address, phone number and/or fax number, your employer and job title, demographic



information about you including birth year and other demographic data, etc. Such information is only required to allow SGC to respond to your inquiries and connect you with services and products provided through the SGC website.

SGC collects Personal Information in the following ways from different parts of the SGC website:

- **Program and Fellowship Applications:** You are sharing Personal Information with us when you apply for or inquire about SGC programs and fellowships through the SGC website.
- **Inquiries and Requests for Information:** When inquiring about specific services or requesting information we may ask for the same type of Personal Information. For example, if you subscribe to an e-mail newsletter, we will ask you to provide your e-mail address.
- **Employment Applications:** When you apply for employment with SGC using the SGC website, we may ask for your Personal Information, including copies of your Resume or CV, and any other information required to verify your qualifications.
- **SGC Research and Evaluation:** When you participate in SGC research and evaluation activities, except as described below, we may ask for your Personal Information, such as name, e-mail address, employer, and any other information required to verify your qualifications to participate and to conduct the research.
- **SGC Employer Programs:** When you participate in certain SGC programs purchased by your employer used for assessment, training and other workplace growth opportunities, we may collect your Personal Information from you or your employer, such as name, e-mail address, or other information required in order for you to participate in the program.
- **SGC Donations, Fellowships and Scholarships:** When you make a donation to SGC fellowships and scholarships, or apply for a SGC scholarship, fellowship, or other award, we may collect your Personal Information, such as your name, address, e-mail address, phone, educational institution (if applicable), and payment information (if applicable) for the purpose of processing your donation or award application, and recognizing you as an award winner.

## 2. What are "cookies" and how does SGC use them?

A cookie is a small text file containing a unique identification number that is transferred from a website to the hard drive of your computer. This unique number identifies your web browser to SGC computers whenever you visit the SGC website.

The use of cookies is an industry standard, and cookies are currently used on most major websites. Most web browsers are initially set up to accept cookies. If you prefer, you can reset your browser to notify you when you have received a cookie. You can also set your browser to refuse to accept cookies altogether.

The SGC website uses a "Cookie Banner", which displays across the bottom of the browser window upon navigation to the website. Using this banner, you can elect to enable all cookies by clicking "Accept", or you can choose the types of cookies you wish to enable or turn off by clicking the "Select" button.

While SGC does not require you to use cookies, keep in mind that certain services will not function properly if you set your browser to refuse all cookies. To help serve you better, SGC generally uses cookies to:



- Identify return visitors. Cookies let us remember your web browser so we can provide personalized services. Cookies also allow us to identify SGC members who are returning to the site.
- Display advertisements. SGC may, from time to time, use an outside ad company to display SGC-approved ads on our website. While we use cookies on other parts of our website(s), cookies received with banner ads are collected by the ad company. These cookies allow SGC to manage the delivery of ads.

### 3. Do we share information with third parties?

Personal Information collected through the SGC website is generally collected and maintained solely by SGC or its contracted vendors.

We may share Personal Information in the following ways:

#### a) Information You Give Us

1. Personal Information provided when you register for services or products. When you provide Personal Information about you on the SGC website to register for a service, buy a product, or request information, SGC will share such Personal Information as necessary to the complete the transaction requested by you. SGC also reserves the right provide to selected third parties, mailing/information/client lists derived from such registrations.

**If you wish to opt out of the distribution of such lists to third parties at any time, you may do so by following the directions in Item 6 below. We will not share Personal Information relating to individuals based in the EU or the United Kingdom (the "UK") unless you have provided your opt in consent.**

2. Information provided when you apply for employment with SGC. If you apply for a position with SGC, you provide Personal Information required to verify your employment qualifications, including copies of your Resume or CV, in order to do education and employment verification, including your employment status, as required by law or SGC policy. **SGC does not sell or share Personal Information related to employment applications except as necessary to process the application, to conduct the required background checks and education and employment verification, or as necessary to comply with legal obligations.**
3. Information provided when you participate in SGC research and evaluation activities. If you participate in SGC research and evaluation activities, you may provide Personal Information about you, including your name, e-mail address, employer, and any other information required to confirm your eligibility to participate and to conduct the stated research. **SGC does not sell Personal Information related to SGC research activities, and, except as described below, will only share such Personal Information as necessary to process your application (if applicable), to allow you to participate in the research or evaluation, or as otherwise instructed by you.** In some cases, SGC may publish demographic information gathered in the course of the research. However, such information will only be published in an aggregated, non-identifiable format, for the purpose of reporting on the demographics of the participant group as a whole (e.g., "the participant group had an average of X years of experience in cultural anthropology", etc.), or where such information is relevant to the results of the research.
4. Information provided when you participate in a SGC Employer Program. If you participate in certain SGC programs purchased by your employer, as outlined in Section 1(b) above, we



may collect Personal Information about you, including your name and work email address in order to allow you to participate in such programs. *With respect to these programs only*, for the purposes of the GDPR, SGC is a processor, and is processing your data on behalf of your employer. **SGC does not sell Personal Information related to these SGC Employer Programs, and will only share such Personal Information as necessary to allow you to participate in these programs.**

5. Information provided when you make a donation to SGC scholarships and fellowships, or apply for a SGC scholarship, fellowship, or other award. If you make a donation to SGC or apply for a SGC award, we may collect Personal Information about you in order to process your donation or application, provide the award (if applicable), and to recognize you as a donor (unless you choose to remain anonymous) or award winner. **SGC does not sell Personal Information related to any donations or award winners. SGC and will only share such Personal Information as necessary to process your donation or application, to recognize you as a donor (unless you choose to remain anonymous) or award winner, or as otherwise instructed by you.**

Sensitive Personal Information. **SGC does not share with third parties, sensitive Personal Information such as passcodes, social security numbers, credit card numbers, felony conviction information, or health information except as necessary to complete transactions requested by you, to process employment applications, or to comply with legal obligations**, and under strict confidentiality and security protections; nor does SGC publish such sensitive Personal Information.

#### b) Site Use Information

We may disclose to third-party sponsors/advertisers aggregate statistics (i.e., impressions and click-throughs on a company's advertisement).

In addition, we may share aggregate website statistics with the media or other third parties. We do not disclose Personal Information to these sponsors/advertisers or other third parties as part of this process, only information in an aggregate form.

#### 4. How do we use the information we collect?

We use your Personal Information according to the terms of the Privacy Policy in effect at the time of our use. We will only process your Personal Information, including sharing it with third parties, where (1) you have provided your consent which can be withdrawn at any time, (2) the processing is necessary for the performance of a contract to which you are a party, or in the case of SGC Employer Programs, for the performance of a contract between SGC and your employer, (3) we are required by law, (4) processing is required to protect your vital interests or those of another person, or (5) processing is necessary for the purposes of our legitimate commercial interests, provided your interests and fundamental rights do not override those interests.

We use Personal Information for the following purposes:

##### a) Information You Give Us

We use the Personal Information you give us:



1. to carry out our obligations arising from your contract with SGC, and any other agreement entered into between you and us, or in the case of SGC Employer Programs, between SGC and the vendor
2. to update your client information as required
3. to provide you with the information, products and services you request from us
4. to arrange and deliver conferences, events and programming relevant to your subjects of interest
5. to respond to your questions and provide related client services
6. to improve the SGC website
7. to send you SGC publications, information about benefits and special offers, and other information that SGC believes is relevant and useful to its clients and prospective clients, where you have not opted out of receiving such information; we may automatically process your information to determine which products and services may be of most use to you. You may object to such processing by contacting us at [directors@sweetgrassconsulting.net](mailto:directors@sweetgrassconsulting.net)
8. to send you third party information that SGC believes is relevant and useful to you, where you have given your consent
9. to notify you about changes to your relationship with SGC or related services or to ask you to provide feedback
10. to enable you to partake in a prize draw, competition or complete a survey
11. to administer and protect our business and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)
12. for those who apply for employment with SGC, to process your employment application, including background checks and education and employment verification, as applicable
13. to comply with all applicable laws or legal processes, including providing information on individual users to the appropriate governmental authorities where required by law enforcement or judicial authorities
  - i. in matters involving a danger to personal or public safety, or to protect the rights, property or safety of SGC, our clients, or others, SGC may voluntarily provide information to appropriate governmental authorities
  - ii. in some cases clients may receive products or services, which are paid for by their government employer, and as a result of payment by the government employer, the record must be open for public access pursuant to applicable law, such as the Florida Public Records Act, and SGC will share only such information as is mandatory pursuant to those laws
  - iii. in some cases members who are veterans may receive products or services, which are paid for by the Department of Veterans Affairs (VA), and as a result of payment by the VA, the record must be made available to the VA pursuant to VA regulation, and for processing payment, and SGC will share such information pursuant to such regulations.
  - iv. Tribal governments.

**b) Site Use Information**

As mentioned above, SGC uses the aggregate, anonymous data collected to let our sponsors/advertisers know the number of impressions or views and the number of "click throughs" on their advertisement(s).



SGC also uses this aggregate, anonymous data to perform statistical analyses of the collective characteristics and behavior of visitors to the SGC website; to measure user interests regarding specific areas of the SGC website; and to analyze how and where best to use our resources.

Without such data, we would not know which parts of the SGC website are the most popular, and we would not be able to change and update the content and services appropriately.

### **c) Exceptions**

On occasion SGC collects Personal Information through the SGC website with the intent to afford a greater degree of privacy for such information than is otherwise set forth in this privacy policy.

In those relatively rare situations where SGC does so it will clearly disclose to you at the time it collects such information, what degree of privacy will be afforded to the Personal Information collected at such time; and SGC will follow a process to assure that the specifically disclosed degree of privacy is in fact afforded to such information.

For example, SGC may collect survey information through a survey where SGC's use of any Personal Information from that survey is more limited than the general SGC Privacy Statement would otherwise allow; in such a case, SGC will disclose the stricter privacy policy governing that survey information at the time such Personal Information is collected from the survey respondent.

## **5. How can you review and modify your Personal Information?**

You have the following options for modifying or causing to be deleted Personal Information or demographic information previously provided by you to SGC or its subsidiaries.

### SGC

1. E-mail: [Directors@sweetgrassconsulting.net](mailto:Directors@sweetgrassconsulting.net)
2. Send mail to the following postal address: Sweet Grass Consulting, LLC, 1501 Cleveland Avenue, Loveland, Colorado 80538, ATTN: Directors.
3. Call: 970-412-5836.

## **6. What is the opt-out policy for the SGC website?**

SGC provides members and customers with the opportunity to opt-out of receiving communications from us and our partners. If you no longer wish to receive specific communications or services, you have the following options:

### SGC

1. E-mail: [Directors@sweetgrassconsulting.net](mailto:Directors@sweetgrassconsulting.net)
2. Send mail to the following postal address: Sweet Grass Consulting, LLC, 1501 Cleveland Avenue, Loveland, Colorado 80538, ATTN: Directors.
3. Phone: 970-412-5836

## **7. Your California Privacy Rights**



**For California Residents Only.** SGC may disclose your Personal Information to our subsidiaries or other third parties who may use that information to market directly to you. As a California resident, you have the right to opt-out of having your Personal Information licensed to such third parties. We will not share your information after we have received your notification that you are opting out. If you wish to opt-out you have the following options:

SGC

1. E-mail: [Directors@sweetgrassconsulting.net](mailto:Directors@sweetgrassconsulting.net)
2. Send mail to the following postal address: Sweet Grass Consulting, LLC, 1501 Cleveland Avenue, Loveland, Colorado 80538, ATTN: Directors.
3. Call: 970-412-5836.

**8. Your European Privacy Rights**

**For European or United Kingdom Residents Only.** If you are based in the EU or the UK, in certain circumstances, you have rights under the GDPR in relation to your Personal Information.

- **Request access to your Personal Information.** You may have the right to request access to any Personal Information we hold about you as well as related information, including the purposes for processing the Personal Information, the recipients or categories of recipients with whom the Personal Information has been shared, where possible, the period for which the Personal Information will be stored, the source of the Personal Information, and the existence of any automated decision making.
- **Request correction of your Personal Information.** You may have the right to obtain without undue delay the rectification of any inaccurate Personal Information we hold about you.
- **Request erasure of your Personal Information.** You may have the right to request that Personal Information held about you is deleted.
- **Request restriction of processing your Personal Information.** You may have the right to prevent or restrict processing of your Personal Information.
- **Request transfer of your Personal Information.** You may have the right to request transfer of Personal Information directly to a third party where this is technically feasible.

Where you believe that we have not complied with our obligations under this Privacy Policy, or under European or UK data protection laws, you have the right to make a complaint to an EU or UK Data Protection Authority, such as the UK Information Commissioner's Office.

If you wish to exercise your European or UK data subject rights, you have the following options:

SGC

1. E-mail: [Directors@sweetgrassconsulting.net](mailto:Directors@sweetgrassconsulting.net)
2. Send mail to the following postal address: Sweet Grass Consulting, LLC, 1501 Cleveland Avenue, Loveland, Colorado 80538, ATTN: Directors.
3. Call: 970-412-5836.

**9. What kinds of security procedures are in place to protect against the loss, misuse or alteration of your information?**



The SGC website has security measures equal to or better than those reasonably expected in the industry, such as firewalls, in place to protect against the loss, misuse and alteration of your Personal Information under our control. While we cannot guarantee that loss, misuse or alteration to data will not occur, we take reasonable precautions to prevent such unfortunate occurrences.

**10. How does the SGC website use bulletin boards, discussion lists, and moderated chats?**

The SGC website may make bulletin boards, blog entries, and moderated chats available to its clients and prospective clients. Any information that is disclosed in these areas becomes public information, and you should exercise caution when deciding to disclose your Personal Information. Although users may post messages that will appear on the message boards anonymously, SGC does retain a record of who posts all notes.

**PART II – SGC PRIVACY POLICY FOR INFORMATION COLLECTED OTHER THAN THROUGH THE SGC WEBSITE**

If you submit Personal Information to SGC through any channel other than the SGC website, the same privacy rules set forth at Part I above for the SGC website will be applied to such Personal Information you submit through channels other than the SGC website (including without limitation your opt-out rights at Part I, Section 6 above), except as follows:

1. The "cookies" and other tracking devices used by the SGC website and described in Part I above do not apply to Personal Information gathered through channels other than the SGC website.
2. Hardcopy Personal Information provided to SGC which is not converted to electronic media and hosted by SGC will be subject to different security procedures than will stored electronic Personal Information. SGC has security measures equal to or better than those reasonably expected in the industry, in place to protect against the loss, misuse and alteration of your hardcopy Personal Information under our control.
3. When SGC collects Personal Information through channels other than the SGC website it may in some instances apply a different data security policy to such information; but where it does so it shall conspicuously disclose to you at the time of collection what data security policy will apply to such information. For example, SGC may collect survey information through a survey where SGC's use of any Personal Information from that survey is more limited than the general SGC Privacy Statement would otherwise allow; in such a case SGC will disclose the stricter privacy policy governing that survey information at the time such Personal Information is collected from the survey respondent.

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