



ARC CONSULTING, LLC
BUSINESS SERVICES
PRIVACY POLICY

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Document Owner
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1. The Services

This ARC Business Services privacy policy (“Privacy Policy”) explains our privacy practices for processing our clients’ business data via our business services. ARC’s clients are companies that use Remote Call, Chat, and Email Performance Evaluations, Telephone, Chat, and Email Mystery Shopping, Customer Satisfaction Surveys, Employee Engagement Surveys, Call Coaching, and Training. The Privacy Policy applies when our Clients give information to us for evaluation or when our Clients incorporate our Business Services as a component of their service. ARC offers an integrated solution that provides clients with the information they need to drive sales, develop a strong service culture within their organization, and to keep them at the forefront of their industry in customer satisfaction and retention. (“Business Services”).

ARC has no direct interaction with individuals who use our Clients’ Services. ARC’s Clients are required to provide notice to individuals and to obtain the appropriate authorizations and lawful bases for ARC’s evaluations and training as outlined in this Privacy Policy and to provide a privacy policy of their own.

This Policy applies to all ARC’s operating divisions and affiliates. ARC has put in place devices to verify ongoing compliance with this Policy. Any employee or independent contractor who violates these privacy principles will be subject to disciplinary procedures.

2. Business Data We Receive

ARC gathers business data to provide Business Services and other specific purposes outlined in this Privacy Policy. We do not consciously collect information on children under sixteen years of age, and our services are not directed to such uses. In some jurisdictions, Business data may be considered as personal data.

When communicating providing the Business Services, ARC may obtain the following:

- Information about the Client, the Client’s employees, the Client’s customers, and the Client’s business processes.
- Personally Identifiable Information
 - A full name, name, maiden name, mother’s maiden name, or an alias.
 - A financial account, or credit card number.
 - A street or email address.
 - Any kind of telephone numbers, mobile numbers, business, and personal numbers.

- Information about an individual affiliated or with one of the above (e.g., financial information, medical information, place of birth, race, religion, weight, date of birth, employment information, geographical indicators).

3. What We Do with Business Data?

ARC utilizes business data to:

- provide the Business Services,
- provide support and training,
- measure the Business Services' activity for quality control and customer service,
- sustain, improve and evolve the Business Services,
- guarantee internal quality control,
- carry out activities per the directions of our Clients.

4. Sharing Information with Others

We may share data for the following purposes:

ARC may share data we receive with sub-contractors, employees, and service providers. The kinds of service providers to whom we consign data involve service providers for: IT-related services; online reporting platforms, customer service activities; call editing, training, and coaching, the requirement of information and services the client has requested; and the terms of the Business Services. We have administered relevant contracts with our service providers that forbid them from using or sharing information except as essential to perform the contracted services on our behalf or comply with applicable legal requirements.

ARC may use third-party platforms such as Google Workspace, Okta Verify, ResearchMetrics (ShopMetrics) and Prism Intelligence as part of our Business Services.

5. Data Retention

ARC retains and stores business data for as long as directed by its Clients and for its personal data as long as required to fulfill the objectives for which it was gathered to provide our Business Services, enforce our agreements and comply with applicable laws.

6. Transfer of data outside your territory

ARC may process and store data in various locations in the United States, in sites managed and controlled by cloud-based service providers and other types of service providers.

ARC will implement data onward transfer instruments to the degree required under applicable privacy laws and regulations and/or its Client contracts.

7. Information Security

ARC is committed to safeguarding the confidentiality of personal information it collects and its Clients' business data. ARC makes consistent efforts to secure personal information, minimize damage, risks of theft, loss of data, or unauthorized access or use. However, ARC cannot guarantee that the Business Services will be exempt from any wrongdoings, bugs, access, unlawful interceptions, or other kinds of abuse and misuse.

8. Collection of Information

ARC gathers personally identifiable information, like names, postal addresses, email addresses, etc., when freely submitted by our website visitors. The information collected is used to satisfy a request for information about our Business Services.

9. Cookie and Tracking technology

Cookie and tracking technology help gather information like operating system or browser type, track the number of visitors to the Site, and recognize how visitors are using the ARC Site. Cookies can also aid in customizing the Site for visitors. Personal information cannot be collected through cookies and other tracking technology; however, cookies may be tied to such information if you previously provided personally identifiable information. Accumulated cookie and tracking information may be shared with third parties. The ARC site may use cookie and tracking technology depending on the features offered.

10. Distribution of Information

We may yield information with companies or governmental agencies helping us in fraud investigation or prevention in the following situations: (1) permitted or required by law; (2) investigating fraud that has already taken place; (3) attempting to protect against or prevent actual or potential fraud or unauthorized transactions. The information is not granted to these companies for marketing purposes.

11. California Privacy Rights

This section of the Privacy Policy pertains only to users, visitors and others who reside in the State of California.

Personal Information Collected & Shared Under the CCPA

We utilize this segment in compliance with the California Consumer Privacy Act of 2018 ("CCPA").

Any articles defined in the CCPA have the equivalent meaning when applied in this section.

ARC collects personal information. This Personal information does not include publicly available information from government records; de-identified or aggregated consumer information; or information excluded from the CCPA. The personal information that we collect includes information that may identify, relate to, describe, is rationally able to be

associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

Your Rights and Choices

This Privacy Policy To exercise your privacy rights under the CCPA, please submit a verifiable consumer request to our email info@arcqs.com. Note that only you, or a person that is authorized to act on your behalf, may make a valid consumer request related to your personal information.

ARC will not discriminate against anyone for exercising any of their CCPA rights.

California's definition of "sale" includes transfers that habitually may not be thought of as a "sale" in the usual traditional of the word, like sharing data with our affiliates.

12. Changes to this Privacy Policy

This Privacy Policy may change periodically. In the event of any tangible changes to this Privacy Policy, ARC will inform any required parties as dictated by applicable law. You agree and understand that you will be considered to have accepted the updated Privacy Policy if you use the Business Services after the updated Privacy Policy is posted to this website. If you do not agree to any part of the Privacy Policy, then in effect, you must instantly stop using the Business Services.

13. Contact Us

For any concerns, questions, or comments, please send correspondence to ARC Consulting, LLC, 820 Columbia Street Orange, CT 06477 or via email to info@arcqs.com.

The right to access personal data and correction.

You have the right to correcting or updating your personal data at any time. We understand the value of this, and if you want to exercise your rights, you may contact us by sending an email to info@arcqs.com and indicate the subject as "request to update or correct my personal data,"

The right to data portability

Your personal data is portable, which means it can be copied, moved, or transmitted electronically. Nonetheless, this right is only applicable when:

- Processing is based on your consent;
- Processing necessitates executing a contract;
- he processing transpires by automated means;

Concerning what is written above, you have the right to receive the personal data you provided in a commonly recognized, structured, and machine-readable format and can transmit that data to a different controller.

If you want to utilize your right to data portability, please contact us by sending an email to info@arcqs.com indicating the contact subject ("request to exercise data portability right").

The right to deletion of personal data

You have the right to ask that your data be deleted when:

- the personal data you provided is no longer necessary concerning the objectives for which we collected it; or
- you revoke the permission that you had previously given for processing your personal data, and there are no additional legal grounds to process that personal data; or
- any time if you desire; or
- the data is not being processed legally; or
- your personal data needs to be deleted to adhere to the law.

If you wish to delete personal data that we hold about you, let us know by sending an email to info@arcqs.com indicating the contact subject (e.g., 'request for deleting my personal data'); we will respond to the request within 20 days.

If the personal data collected is no longer required for any expectations and by law, we are not required to retain it, we will do what we can to delete it.

Your right to restriction of processing data

- Restricting the processing of your personal data is possible in the following cases:
- you do not believe the personal data we have about you is accurate; or
- you believe the personal data is not being processed lawfully, but instead of deletion of the personal data, you request us to restrict the processing thereof; or
- we no longer require your personal data for the purposes we collected it, but you need the data to exercise, establish, or defend legal claims; or
- you have objected to the processing of your personal data and are awaiting verification on whether your concerns related to that objection exceed the legitimate grounds for processing your data.

If you prefer to restrict our personal data processing, please let us know by sending an email to info@arcqs.com and indicate in the subject (e.g., 'request for the restriction of processing my personal data'). We will respond to your request within 20 days.

The right to object

You have the right to dissent to the processing of your personal data at any moment. Please contact ARC Consulting, LLC by sending an email to info@arcqs.com and indicate in the subject (e.g., 'request for exercise right to object), and we will respond to your request within 20 days.

You have the right to file any complaints with a supervisory authority.

You have the right to file complaints directly with responsible supervisory data protection authorities about how we process personal data.

Moreover, in case of infringement of any of your rights or if you are not satisfied with the answer, you are entitled to seek remedy at the competent supervisory data protection authority and/or court.

USA data protection authorities:

Federal Trade Commission

600 Pennsylvania Avenue, NW Washington, DC 20580;

telephone: +1 (202) 326-2222