

Longhorn-IFT Privacy Policy

Last updated: 9 July 2023

The Longhorn Institute of Food Technologists (LIFT) may at any time revise its Privacy Policy and Terms of Service policies. By accessing, browsing, or using the LIFT Site, you accept and agree to, without limitation or qualification, these Terms and Services (and any amendments) and LIFT's Privacy Policy. You are encouraged to visit this page from time to time to review the current policies.

The Longhorn Institute of Food Technologists (“LIFT”, “we”, “our”, or “us”) is committed to protecting your privacy. This privacy policy, available at the longhorn-ift.org website and as updated from time to time (“Privacy Policy”), is intended to disclose to our website visitors, members, customers, donors, partners, event registrants, and attendees how LIFT collects, uses, safeguards, and discloses the information collected on its various websites, including, longhorn-ift.org, *.expofp.com, “Websites”), our mobile application software (“Mobile App”) and all other publicly available online services controlled or provided by LIFT or its affiliates (collectively, the “Services”).

CONTACT INFORMATION

If you have questions about LIFT’s Privacy Policy or practices, or if you need to contact us about the information we collect about you, our contact information is:

LIFT

Longhorn Institute of Food Technologists
Www.longhorn-ift.org

APPLICABILITY

Your use of the Websites and our Services is always subject to our Terms of Service (available on the Longhorn-IFT website and as updated from time to time (the “Terms”)), which is incorporated by reference herein. Any capitalized terms we use in this Privacy Policy without defining them have the definitions given to them in the Terms. This Privacy Policy applies only to the Services, and LIFT’s collection, use, disclosure, and protection of your data. It does not apply to third-party websites, applications, or services.

Before accessing, using, or interacting with the Services you should carefully review the terms and conditions of this Privacy Policy.

ELIGIBILITY TO USE THE SERVICES

The Services are not directed to children under the age of 16. You may not use the Services unless you are over the age of 16. In the event that we learn that we have collected Personal Information from a child age 16 or younger without verification of parental consent, we will use commercially reasonable efforts to delete that information from our database.

See the section below under the heading “Additional Restrictions on Collection and Use of Sensitive Data” for information on additional steps LIFT takes to manage the privacy of data that are considered “sensitive data” by GDPR and other privacy regulations.

INFORMATION COVERED

This Privacy Policy covers our treatment of your personally identifiable information, which information may include name, mailing address, email address, telephone number, and other information which identifies you as a specific individual (“**Personal Information**”). Please see additional information below on the information we collect. For this Privacy Policy the definition of “Personal Information” is the definition under the state, country, or other law applicable to the person whose data is collected. If you are a citizen or resident of the European Economic Area

(“EEA“), United Kingdom, or Switzerland, the definition of Personal Information is defined under the General Data Protection Regulation (“GDPR”) and you have certain rights; therefore, please see the section below under the heading “GDPR” for more information.

Personal Information does not include your Personal Information that has been deidentified, pseudonymized, anonymized, aggregated, and/or otherwise processed so as to be unidentifiable in such a way that the data can no longer be attributed to a specific individual (by reasonable means) without the use of additional information, and where such additional information is kept separate and under adequate security to prevent unauthorized re-identification of a specific individual such that one could not, using reasonable efforts, link such information back to a specific individual (collectively, all of the foregoing in this sentence being referred to as “**De-Identified Personal Information**”).

INFORMATION WE COLLECT

Visitors may generally browse public portions of the Website anonymously without providing any Personal Information. LIFT collects data about you and your use of the Services through various means, including when you provide information when you apply to become an LIFT Member, donate, register for events or webinars, when you make a purchase from our Websites, and when we automatically collect information about you when you access, use, or interact with the Websites or the Services.

The types of Personal Information LIFT may collect about you include:

Category	Specific Items of Personal Information
Identifiers	Name, username, email address, postal address, unique personal identifier (e.g.: device identifier (e.g., mobile device ID), IP address, customer/account name or number, phone number, cookies, beacons, pixel tags, and mobile ad identifiers)
Characteristics of legally protected classifications	race, sex, gender identity and expression, sexual orientation, age, and country of origin, religion
Commercial Information	products/services purchased, purchasing/consuming history or tendencies, donation history
Internet or other electronic network activity	browsing, session, interaction, and search history related to our website
Geolocation	physical location or movements
Audio, electronic, visual, thermal, olfactory, or similar information	voice and video recording
Professional or employment information	email address that identifies you (e.g., jane.r.smith@website.com versus jrs@website.com), employment and employment history
Other information	education history
Inferences drawn from any of the above to create a profile of a consumer	a person’s preferences, characteristics, and behavior

HOW WE COLLECT PERSONAL INFORMATION

The Personal Information we collect through our websites, or from our affiliates or service providers may be obtained as part of the following:

- Information that you provide by filling in webforms on our website. This includes information provided when creating an online account, purchasing/registering our Products or Services, subscribing to our e-newsletters or other communications, requesting information from us, submitting or posting material (where permitted) on our forums, or interacting with customer support or service, report a problem with our website, products, or Services, or otherwise communicating with us.

- Records and copies of your correspondence (including email addresses), if you contact us
- Registering for an event
- Your responses to surveys that we or our service providers might ask you to complete for research purposes
- Your search queries on the website
- On mobile applications
- When communicating with customer service/support
- Third party websites and mobile applications (e.g., websites that share information with us or advertising partners regarding online activities)
- Data suppliers (e.g., companies that provide demographics and other information regarding consumers)
- When making a donation via our website
- Joint marketing partners
- Online advertising companies
- Fulfillment and delivery service providers
- Social media companies
- Other service providers
- Responding to employment opportunities

LIFT Membership and Event Registration: We collect Personal Information from you when you register for membership on our websites, purchase a subscription, signup for webinar, emails, newsletters, or white papers, or register to attend Annual Event.

LIFT Account Information: LIFT may require you to register for an account (an “LIFT Account”) to use certain Services. We do not require you to register to use all of our Services. However, if you do register for Services offering a LIFT Account, you will gain access to those areas and features of the Services that require registration. LIFT will collect certain information about you in connection with your registration for your LIFT Account, which may include Personal Information and other information such as a username, password, personal profile, pictures, your location, information about your contacts, and other information. Some of your LIFT Account information may be displayed publicly. You are not required to provide your Personal Information; however, if you choose not to provide certain Personal Information, we may not be able to provide you with certain Services.

Our Job Postings link on our website has information about employment opportunities for member and customers. Certain Personal Information will be requested of you. We may be provided your information, including some or all of the Personal Information (and other information) you submit.

Payment Transaction Information: We may collect, and store information related to purchases and donations made through the Services. To complete payments via the Services, you may be required to provide to our Service Providers your credit or debit card number, card expiration date, CVV code, and billing address (collectively, “Payment Information”), along with your name and billing, delivery, and shipping address. **LIFT does not itself collect or maintain your credit card or other financial account information; this information is handled for LIFT by our payment processing Service Providers.** You are subject to the privacy policies and terms and conditions of our Service Providers when purchasing an LIFT membership, shopping for LIFT products, or making donations, the terms of which may differ from those of LIFT for the LIFT Services. Please review the applicable Service Providers’ privacy policy and terms and conditions before using their services.

Correspondence Information: If you sign up for a membership, attend a conference or event, email us, subscribe to our newsletters mailing lists, publications, or blogs, we may keep your message, email address, and contact information to respond to your requests, provide the requested products or Services, and to provide notifications or other correspondences to you. If you do not want to receive email from us in the future, you may let us know by sending us an email or by writing to us at the address below or by unsubscribing from within electronic correspondence you receive from us. Please note requests to remove your email address from our lists may take some time to fulfill. We may also still contact you as needed to provide important announcements or notifications regarding the Services.

INFORMATION WE COLLECT AUTOMATICALLY

Cookies, Web Beacons, Links, and other tracking technologies: LIFT may keep track of how you use and interact with the Services using cookies, web beacons, links, and other tracking technologies. We do this to help analyze the use of and improve the Services. Through these technologies we may automatically collect information about your use of the Services and other online activities, including our email correspondences, third-party services, and client applications, and certain online activities after you leave the Services. Link information is generally only analyzed on an aggregate basis. Some Services may not function properly if you disable cookies. Such data may include analytics information, sites visited before visiting the Services, browser type, operating system, and tracking of your interactions with our content and emails.

Google Tools

- **Google Analytics.** We use, and some of our third-party service providers may use, [Google Analytics](#) (click for link to Google’s website) or other analytics service to help us understand use of our Website and Services. Such service providers may place their own cookies in your browser. This Privacy Policy covers use of cookies by us only and not the use of cookies by third parties.
- **Google AdSense Advertising.** We use Google AdSense Advertising (or other search engine or display network advertising) on our website. Google’s advertising requirements and principles are set forth [here](#). They are put in place to provide a positive experience for users. We have implemented the following: (a) Remarketing with Google AdSense and (b) Google Display Network Impression Reporting.
- **Google reCAPTCHA.** We may use Google reCAPTCHA, which identifies bots by collecting hardware and software information and sending that data to Google for analysis. To learn more about Google reCAPTCHA, please visit <https://www.google.com/recaptcha/intro/invisible.html> or <https://www.google.com/policies/privacy/>.

Users can set preferences for how Google advertises to you using the Google Ad Settings page. Alternatively, you can opt out by visiting the Network Advertising Initiative Opt Out page or by using the Google Analytics Opt Out Browser add-on.

POSTING CONTENT

You also may submit information, such as comments, reviews, testimonials, etc., to be published or displayed (“posted”) on public areas of the Website or transmitted to other users of the Website or third parties (collectively, “Content”). Your Content is posted and transmitted to others at your own risk. We cannot control the actions of other users of the Website with whom you may choose to share your Content. Therefore, we cannot and do not guarantee that your Content will not be viewed by unauthorized persons. By posting any Content or submitting Content for posting you agree to and do hereby grant us and our licensors, affiliates, partners, successors and assigns, a nonexclusive, perpetual, irrevocable, worldwide, sublicensable, transferrable, royalty-free right and license to use, store, display, publish, transmit, transfer, distribute, reproduce, rearrange, edit, redact, modify, aggregate, summarize, adapt, create derivative works of and publicly perform the Content that you post or otherwise submit to us for any purpose, in any form, medium, or technology now known or later developed (“**Right to Use**”).

The Right to Use you grant us above also extends to any Content that you have posted to our Facebook or other social media account pages, or on other websites, e.g., Google, Yelp, Trip Advisor, Instagram, etc. The term “Use” includes, but is not limited to, use, reproduce, modify, publish, list information regarding, edit, delete, translate, distribute, publicly display, publicly perform, and make derivative works of the content.

HOW WE USE YOUR PERSONAL INFORMATION

We use information that we collect about you or that you provide to us, including any Personal Information, for one or more of the following purposes:

- To present our Website and Mobile App and its contents to you.
- To provide you with information and respond to your questions on products or Services that you request from us and information on new products and services, discounts, special promotions or upcoming events, and features or offers that we believe will be of interest to you.
- To provide you with the products, services, or information that you have requested.
- To process transaction payments, including, but not limited to, product and/or service fees, subscription fees, professional fees, membership dues, registration fees, voluntary contributions, examination fees, credential and designation fees, and payments, refunds and reimbursements for any products or services that you choose to purchase from us (though we do not receive your credit or debit card number).
- We may use online forms to request certain information from you to perform certain Services, such as your location to assist you in locating our products, or your contact information to assist with contacts or service requests.
- To provide you with notices about your account, including expiration and renewal notices.
- To notify you about information regarding or changes to our website, our policies, terms, or any products or Services we offer or provide, or regarding your account
- To process your account application and any changes to your account information.
- To process Personal Information or other information that you submit through to us.
- To allow you to participate in interactive features on our website.
- To contact you about our own and third parties' products and services that may be of interest to you.
- To provide access to restricted parts of our website, e.g., areas accessible if you have a user account.
- To enhance and improve our products and Services, for example, by performing internal research, analyzing user trends, or measuring demographics and interests.
- For internal purposes, such as Website and system administration or internal audits and reviews.
- For analyzing how the Services are used, diagnosing Service or technical problems, maintaining security, and personalizing content.
- To operate, maintain, and provide to you the features and functionality of the Services.
- To provide statistics about the usage levels of the Website and other related information to our service providers.
- To notify you of data privacy incidents or provide you with legally required information.
- To contact you regarding a contest, or promotion in which you have participated.
- To request your participation in ratings, reviews, surveys, focus groups, or other initiatives which help us to gather information used to develop and enhance our products and Services.
- To determine eligibility for membership, credentials, designations, or volunteer opportunities.
- To evaluate your performance on continued learning courses and assist you in the tracking of your progress.
- For examination or event registration, scheduling, event attendance, administration and related purposes.
- To fulfill any other purpose for which you provide Personal Information.
- In any other way we may describe and for which we obtain your consent when you provide the information, and you give your consent.

We use this information for a variety of different reasons, including to improve the Services and to tailor the Services to you. We process Personal Information collected through the Services on the lawful basis of legitimate interests to provide the Services to you. Such processing is necessary for the purposes of the legitimate interests pursued by us or by our Service Providers related to the Services.

We use cookies, pixel codes, clear gifs, and log file information to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the Website; (b) provide custom, personalized content and information; (c) monitor the effectiveness of our Service; (d) monitor aggregate metrics such as total number of visitors, traffic, and demographic patterns; (e) diagnose or fix technology problems reported by our users or engineers that are associated with certain IP addresses; and, (f) help you efficiently access your information after you sign in.

We may use your Personal Information you provide us and which we obtain from other sources to better understand your interests so we can try to predict what other products, services, and information you might be most interested

in. This practice involves making automated decisions about you based on this information to better enable us to tailor our interactions with you to make them more relevant and interesting. You may object to our doing this at any time by contacting us (see Contact Information below).

INFORMATION SHARING

We may or do disclose your Personal Information, in whole or in part, to the following types of third parties, and for one or more the following purposes:

- Data storage or hosting providers for the secure storage and transmission of your data
- Database and software service providers for the management and tracking of your data
- Technology providers who assist in the development and management of our website or our Mobile App, or other digitally available products.
- Identity management providers for authentication purposes
- Legal and compliance consultants, such as external counsel, external auditors, or tax consultants
- Payment solution providers for the secure processing of payments you provide to us
- Outbound call center providers, who may perform outreach on our behalf regarding our products and Services
- Fulfillment and shipping vendors for the fulfillment of our Products and Services
- Survey and research providers who perform studies on our behalf
- Publishers and learning providers who develop products on our behalf
- Learning technology and online event providers for the delivery and improvement of web events and learning programs and the tracking of your progress
- Examination providers for the scheduling and delivery of credential and designation examinations
- Digital credential providers for the delivery of digital badges earned through your participation in learning programs
- Advertising partners, including social media providers, for the delivery of targeted advertisements
- Our volunteers or committee members who perform various functions on our behalf

LIFT Personnel: Our personnel may have access to your information as needed to provide and operate the Services in the normal course of business. This includes information regarding your use and interaction with the Services.

Service Providers: We work with various organizations and individuals to help provide the Services to you ("Service Providers"). This includes, without limitation, Service Providers which provide services relating to: outbound and/or inbound communications, data analysis, , marketing assistance, managing customer information, creating, hosting, and/or providing customer or support services on our behalf, fulfilling orders, delivering packages, sending postal mail and email, removing repetitive information from customer lists, providing search results and links (including paid listings and links), and processing credit card payments. These Service Providers may have access to your Personal Information in order to provide these services to us or on our behalf. If we engage Service Providers for any of the foregoing, use of your Personal Information will be bound by obligations of confidentiality and their use of Personal Information will be restricted to providing their services to us. We may store Personal Information in locations outside our direct control (for instance, on servers or databases located or co-located with hosting Service Providers).

- **Event-Related Disclosures:** From time to time, we may run contests, special offers, or other events or activities ("Events"), possibly together with a third-party Service Provider. If you provide information to such Service Providers, you give them permission to use it for the purpose of that Event and any other use to which you consent. We cannot control such third parties' use of your information. If you do not want your information to be collected by or shared with such third parties, you can choose not to participate in these Events.

Business Transactions: You consent to our disclosure of your Personal Information and other information to a potential or actual buyer of our company or of one of our affiliates or other successor for the purpose of considering

a merger, divestiture, restructuring, reorganization, dissolution, change in control, or sale or transfer of some or all of our assets (each of the foregoing referred to as a “**Transfer**”), whether as a going concern or as part of bankruptcy, liquidation or other court proceeding, in which Personal Information held by us is among the assets transferred. You agree to and do hereby consent to (and shall not object to) our assignment, conveyance, transfer, and/or license (whether by contract, merger, or operation of law) as part of a Transfer, of any or all our rights, in whole or in part, in or to your Personal Information and other information and your consents, with or without notice to you and without your further consent.

Lawful Requests: We may be required to disclose User information pursuant to lawful requests, such as subpoenas or court orders, or in compliance with applicable laws. We generally do not disclose User information unless we have a good faith belief that an information request by law enforcement or private litigants meets applicable legal standards. We may share your information when we believe it is necessary to comply with applicable laws, to protect our interests or property, to prevent fraud or other illegal activity perpetrated through the Services or using the LIFT name, or to protect the safety of any person. This may include sharing information with other companies, lawyers, agents, or government agencies. Nothing in this Privacy Policy is intended to limit any legal defenses or objections that you may have to a third party’s, including a government’s, request to disclose your information.

Disclosure of De-Identified Personal Information: We may share De-Identified Personal Information with third parties for any purpose. De-Identified Personal Information or non-Personal Information may be aggregated for system administration and to monitor usage of the Website. It may be utilized to measure the number of visits to our website, average time spent, number of pages viewed and to monitor various other Website statistics. This monitoring helps us evaluate how visitors use and navigate our website so we can improve the content. We may share De-Identified Personal Information or anonymous information (including, but not limited to, anonymous usage data, referring/exit pages and URLs, IP address, platform types, number of clicks, etc.) with interested third parties in any way we choose and for any purpose. We may disclose, sell, rent, etc., your De-Identified Personal Information to third parties and we may receive valuable consideration for doing so.

ADDITIONAL RESTRICTIONS ON COLLECTION AND USE OF SENSITIVE DATA

LIFT also collects sensitive categories of data, as defined by GDPR, including race, ethnicity, native language, gender identity, and sexual orientation. LIFT obtains explicit consent to gather these categories of sensitive data before we accept them from any individual and store them in our database. LIFT uses these categories of sensitive data to measure progress in developing a diverse and inclusive membership community at LIFT, and to conduct activities that promote ongoing development of a diverse and inclusive membership community. LIFT does not provide sensitive data to service providers or other third parties except as may be required by law. LIFT does not display personally identifiable sensitive data to the public. LIFT limits access to sensitive data by LIFT personnel to a small group that needs such access to measure and promote development of a diverse and inclusive membership community at LIFT. LIFT may use service providers to assist with collection of sensitive data. In such cases, LIFT maintains strict confidentiality agreements with the service provider.

DATA TRANSFER/ACCESS OUTSIDE OF THE UNITED STATES

We have our headquarters in the United States. The Personal Information we or our service providers collect may be stored and processed in servers within or outside of the United States and wherever we and our service providers have facilities around the globe, and certain information may be accessible by persons or companies outside of the United States who provide services for us. As such, we and our service providers may transfer your Personal Information to, or access it in, jurisdictions that may not provide equivalent levels of data protection as your home jurisdiction. We will take reasonable steps to ensure that your Personal Information receives an adequate level of protection in the jurisdiction in which we process it. If you are in the UK, European Economic Area (“**EEA**”), or Switzerland, we provide adequate protection for the transfer of Personal Information to countries outside of the UK, EEA, or Switzerland through agreements. We may also need to transfer your information to other group companies or service providers in countries outside the EEA. This may happen if our servers or suppliers and service providers are based outside the UK, EEA, or Switzerland, or if you use our services and products while visiting countries outside this area.

If you are a resident of a country other than the United States, you acknowledge and consent to our collecting, transmitting, processing, transferring, and storing your Personal Information out of the country in which you reside.

SECURITY

We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure. Your Personal Information is contained behind secured networks and a firewall and is only accessible by our personnel and by a limited number of Service Providers who have special access rights to our systems, and who are required to keep the information confidential. Our website, software, and Mobile App software are scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our Website, software, and Mobile App safe.

Any payment transactions will be performed using our third-party payment processors or gateways, who will use appropriate security procedures designed to protect your information. We do not collect or store full credit card numbers.

Our agents, contractors, service providers, and partners who require access to your Personal Information in order to provide services to us or to you on our behalf are also required to keep the information confidential in a manner consistent with this Privacy Policy and are not permitted to disclose the information to third parties or use the information for any purpose other than to carry out the services they are performing for us, or as permitted pursuant to our agreement with them.

The safety and security of your information also depends on you. You should maintain good internet security practices. Where you have password-protected access to an account or certain parts of the Website or Services, you are responsible for keeping this password confidential. You should not share your password with anyone. You must prevent unauthorized access to your account and Personal Information by selecting and protecting your password appropriately and limiting access to your computer or mobile device and browser by signing off after you have finished accessing your account. If your email account or Facebook account is compromised this could allow access to your account with us if you have given up those details and/or permitted access through those accounts. If your email account is compromised, it could be used to ask us to reset a password and gain access to your account with us. If you think that any of your accounts have been compromised you should change your account credentials with us, and make sure any compromised account does not allow access to your account with us. The information you share in public areas may be viewed by other users. We will never email you to ask for your password or other account login information. If you receive such an email, please send it to us so we can investigate. You agree to and do hereby release and forever discharge us and our affiliates, subsidiaries, parents, officers, directors, employees, successors and assigns and contractors (collectively, the "**LIFT Group**"), and you will indemnify, defend and hold the LIFT Group harmless, from any and all past, current, and future liability, claims, demands, damages, losses, fines, penalties, assessments, private rights of action, or other actions, of whatever kind of nature, either in law or equity, as well as costs (including, but not limited to, attorneys' fees and costs), which arise from any failure of you to maintain the security of your email or other accounts which results in unauthorized access by a third party to such account and the transfer of funds by us in reliance of instructions purporting to originate from you.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do use security measures designed to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to us or which we obtain. Any transmission of Personal Information is at your own risk. Unauthorized entry or use, or hardware or software failure, and other factors, may compromise the security of user information at any time. We are not responsible for circumvention of any privacy settings or security measures contained on the Website or used with our Services.

DATA RETENTION

The time periods for which we retain your Personal Information depend on the purposes for which we use it. We will retain your Personal Information for as long as your account is active, or as long as you are a registered subscriber or member or account holder or user of our Services or for as long as we have another business purpose

to do so (such as, but not limited to, for business, tax, or legal purposes) and, thereafter, for no longer than is required or permitted by law, or our records retention policy, reasonably necessary for internal reporting and reconciliation purposes, or to provide you with feedback or information you might request. This period of retention is subject to our review and alteration.

Following termination or deactivation of your user account, we may retain your profile information and all information posted to public areas of the Website. Following termination or deactivation of your user account, we may retain your Personal Information and other data, but will maintain it as confidential according to the Terms, this Privacy Policy, and as required by applicable law. We have the right to delete all your Personal Information and other data after termination of your user account without notice to you.

We may retain De-Identified Personal Information for as long as we deem appropriate.

WHAT INFORMATION YOU CAN ACCESS, CHANGE OR DELETE

Through your user account settings page, you may access and, in some cases, edit, or delete certain information you have provided to us, such as name and password, email address, address, user profile information, etc. The information that you can view, update, and delete may change as the Products, Website, Services, or our practices change. If you have any questions about viewing or updating the information we have on file about you, please contact us.

NOTICES; OPTING OUT

By providing us with your email address (including by “following,” “liking,” linking your account to our Website or Service or other services, etc., on a third party website or network), you consent to our using the email address to send you Service-related notices by email, including any notices required by law (e.g., notice of data privacy or security incidents), in lieu of communication by postal mail. You also agree that we may send you notifications of activity regarding the Services or the Websites to the email address you give us, in accordance with any applicable privacy settings. We may use your email address to send you other messages or content, such as, but not limited to, newsletters, additions, or changes to features of the Service, or special offers. If you do not want to receive such email messages, you may opt out by emailing us your opt-out request or, where available, by clicking “unsubscribe” at the bottom of our e-newsletter. Opting out may prevent you from receiving email messages regarding updates, improvements, special features, announcements, or offers. You may not opt out of Service-related emails.

You can add, update, or delete information as explained above. When you update information, however, we may maintain a copy of the unrevised information in our records. You may request deletion of your account by emailing us. It is your responsibility to maintain your current email address with us.

DO NOT TRACK

LIFT does not currently employ a process for automatically responding to “Do Not Track” (DNT) signals sent by web browsers, mobile devices, or other mechanisms. Per industry standards, third parties may be able to collect information, including Personal Information, about your online activities over time and across different websites or online services when you use Services. You may opt out of online behavioral ads at <http://www.aboutads.info/choices/>. You also may limit certain tracking by disabling cookies in your web browser.

CHANGES TO OUR PRIVACY POLICY

LIFT reserves the right to revise this Privacy Policy at any time by posting a revised version on our websites. Use of the Websites after such change signifies your acceptance of the updated Privacy Policy.

PRIVACY OUTSIDE OF THE UNITED STATES

If you are a citizen or resident of the UK, European Economic Area (“**EEA**”), Switzerland, or other regions with laws governing data collection and use that may differ from the laws in the United States, please note that we may transfer your information to a country or jurisdiction that does not have the same data protection laws as your jurisdiction. We may do so to process your information by staff operating outside these countries who work for us or for one of our service providers.

GDPR

The Follow Provisions Apply Only to Citizens and Residents of the United Kingdom, EEA, or Switzerland

The following provisions apply only if you are a citizen or resident of the UK, EEA or Switzerland. For such citizens or residents, all processing of your Personal Information is performed in accordance with privacy rights and regulations, in particular, (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, known as the General Data Protection Regulation (“**GDPR**”), and our processing will take place in accordance with the GDPR. For purposes of the GDPR, we will be the “data controller” of Personal Information (referred to and defined in the GDPR (available [here](#)) as “Personal Data”) we collect through the Website, unless we collect such information on behalf of a “data controller” in which case we will be a “data processor.” This Privacy Policy does not apply to websites, applications or services that do not display or link to this Privacy Policy or that display or link to a different privacy policy. For UK, EEA, and Switzerland residents and citizens only, to the extent any definition in this Privacy Policy conflicts with a definition under the GDPR, the GDPR definition shall control.

Our Legal Basis for Processing Personal Data (UK, EEA and Swiss Visitors Only)

If you are a visitor using our Website from the UK, EEA or Switzerland, our legal basis for collecting and using the Personal Data described above will depend on the Personal Data concerned and the specific context in which we collect it. However, we will normally collect Personal Data from you only where we need the Personal Data to perform Services for you for which you have contracted with us, or where the processing is in our legitimate interests or rely upon your consent where we are legally required to do so and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect Personal Data from you or may otherwise need the Personal Data to protect your vital interests or those of another person.

Your Rights and Choices Regarding Your Information

If you are subject to GDPR, your rights include the following:

- **The right to access** - Upon request, we will confirm any processing of your Personal Information and provide you with a copy of that Personal Information in an acceptable machine-readable format.
- **The right to rectification** - You have the right to have us correct any inaccurate Personal Information or to have us complete any incomplete Personal Information.
- **The right to erasure** - You may ask us to delete or remove your Personal Information and we will do so in some circumstances, such as where we no longer need it (we may not delete your data when other interests outweigh your right to deletion).
- **The right to restrict processing** - You have the right to ask us to suppress the processing of your Personal Information, but we may still store your Personal Information. See below for more information.
- **The right to object to processing** - You have the right to object to your Personal Information used in the following manners: (a) processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling); (b) direct marketing (including profiling); and (c) processing for purposes of scientific/historical research and statistics. See below for more information.

- **The right to data portability** - You have the right to obtain your Personal Information from us that you consented to give us or that is necessary to perform fulfillment of member benefits with you. We will give you your Personal Information in a structured, commonly used, and machine-readable format.
- **The right to complain to a supervisory authority** - You have the right to file a complaint with a supervisory authority, in the European member state of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of Personal Information relating to you infringes upon your rights.

The right to withdraw consent - If we are processing your Personal Information based on your consent to do so, you may withdraw that consent.