

# TFC Consultants, Inc. Privacy Policy

Last updated: April 13, 2023

**TFC Consultants, Inc. ("us", "we", or "our") operates the <https://focus.tfcOregon.com> website (the "Service").**

This page informs you of our policies regarding the collection, use and disclosure of Personal Information when you use the Service.

We will not use or share your information with anyone except as described in this Privacy Policy.

We use your Personal Information for providing and improving the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible at <https://focus.tfcOregon.com/PDR/terms>

## Privacy Shield Certification

TFC Consultants, Inc. complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. TFC Consultants, Inc. has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>

In compliance with the Privacy Shield Principles TFC Consultants, Inc. commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact TFC Consultants Inc. at:

**Jordan Winans**  
**Office Coordinator**  
**TFC Consultants, Inc.**  
**12 Shelton McMurphey Boulevard**  
**Eugene, OR 97401**  
**Office: (541) 343-2388**  
**[jordanc@tfcOregon.com](mailto:jordanc@tfcOregon.com)**

TFC Consultants Inc. has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints concerning data transferred from the EU.

The Federal Trade Commission has jurisdiction over TFC Consultants, Inc.'s compliance with the Privacy Shield.

An individual has the possibility, under certain conditions, to invoke binding arbitration for complaints regarding Privacy Shield compliance not resolved by any of the other Privacy Shield mechanisms. Please see Annex I for additional information:

<https://www.privacyshield.gov/article?id=ANNEX-I-introduction>

### **Information Collection and Use**

While using the Service, certain Personally Identifiable Information (PII) may be collected and stored. That PII may be used to contact or identify you and/or clients your agency serves. Personally identifiable information may include email addresses, names, phone numbers or other specifically identified information ("Personal Information"). We collect this information for the purpose of providing the Service, identifying and communicating with you, responding to your requests/inquiries, servicing your purchase orders, and improving our services, however we do not require PII to be used or stored. Agencies and the clients they serve may have access to their PII upon request.

We do not sell your Personal Information to third parties, though we at times need to provide access to such information to The Oregon Social Learning's Information Technology Department so that they assist us in providing the Service to you.

We will not share your information with a third party for a purpose that is materially different from the original purpose(s) without your consent. We will also give you an opportunity to choose whether your Personal Data may be used for a purpose that is materially different from the purposes for which it was originally collected or subsequently authorized by you.

### **Log Data and Cookies**

We may also collect information that your browser sends whenever you visit the Service ("Log Data"). This Log Data may include information such as; your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of the Service that you visit, the time and date of your visit, the time spent on those pages, and other statistics.

Cookies are files with a small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and transferred to your device. We may use cookies to collect information in order to improve our services for you.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. The "Help" feature on most browsers provide information on how to accept cookies, disable cookies or to notify you when receiving a new cookie.

If you do not accept cookies, you may not be able to use some features of the Service.

### **Service Providers**

We employ a third party vendor to assist us in providing the Service and operate our business. As mentioned above, this third party may have access to your Personal Information only to extent necessary to perform specific tasks on our behalf. We prohibit all such vendors from otherwise using or disclosing your Personal Information for any other purpose.

Our service provider is The Oregon Social Learning Center's IT department, who provides technical support to TFC Consultants, Inc.

TFC Consultants, Inc. may be liable under the Privacy Shield Principles if its agent process personal information in a manner inconsistent with the Principles, unless proven that it is not responsible for the event giving rise to the damage. However, TFC Consultants, Inc. does not transfer personal information to third parties. Additionally, the provision regarding liability for the actions of agent processors do not apply because our organization will not transfer personal information to third parties.

### **Compliance with Laws**

We will disclose your Personal Information where required to do so by law or subpoena or if we believe that such action is necessary to comply with the law and the reasonable requests of law enforcement or to protect the security or integrity of the Service.

### **Security**

The security of your Personal Information is important to us, and we strive to implement and maintain reasonable, commercially acceptable security procedures and practices appropriate to the nature of the information we store, in order to protect it from unauthorized access, destruction, use, modification, or disclosure.

However, please be aware that no method of transmission over the internet, or method of electronic storage is 100% secure and we are unable to guarantee the absolute security of the Personal Information we have collected from you.

### **Changes to this Privacy Policy**

This Privacy Policy is effective as of April 13, 2023 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our website.

### **Contact Us**

If you have any questions about this Privacy Policy or would like to provide us notice, please contact us at the following:

TFC Consultants, Inc.  
12 Shelton McMurphey Blvd.  
Eugene, OR 97401

001-541-343-2388