

Privacy Policy

Emsi Privacy Statement

Your use of services provided by Economic Modeling, LLC (“Emsi”) is covered by this Privacy Statement (the “Statement”). We believe in a simple, plain-language privacy policy. Here’s a quick overview of what is covered below in this privacy statement:

- You may access most of our services without furnishing any personal information at all.
- Except as expressly stated in this Statement, we won’t furnish your personal information, including your name and email address, to third parties without your specific permission.
- We also use cookies to administer our site and deliver a personalized experience.
- For additional detailed information on each of these, please see below.

This Statement applies only to the Emsi website and does not apply to any third-party websites that may be accessible via the website. This Statement describes the information that we acquire from you when you use our online services, how we use such information, and whom we share it with. Our processing of the personal information you provide to us is subject to this Statement and any subsequent updates.

General

The personal information we do collect from you is based on your interactions with the website. Personal information is information that can be used to identify you or any other individual to whom the information may personally relate – such as name and email address. The information collected from you can include personal, demographic, and behavioral information, as described below. Emsi does not make available to any other party information that could be used to identify you individually, except with your separate consent or as is necessary to develop or provide our services (such as to payment processors, internet service providers, or hosting companies).

By accessing this website, you agree to the collection, use, and transfer of the information provided by you in the manner described in this Statement. Please read this Statement carefully as it affects your rights and liabilities under law.

Please review this Privacy Statement periodically as we may update it from time to time without prior notice to reflect changes in our data practices.

Information We Collect and Retain

We collect personal information that you choose to share with us, as well as information provided directly by your browser or device when you visit our website. You do not have to provide any personal information in order to use our licensed software products (such as Analyst, Developer, and Emsi Global) or perform any of the basic tasks on Career Coach (such as exploring careers or degrees).

Information Collected from You

Manage Account

Some portions of the Emsi website require you to create an account to access them. If you create an account, you will be asked to provide name and email address.

If you have created an account, you will be asked to provide your username and password when signing into your account.

We collect this information for the purpose of granting you access to the protected portions of the website and maintaining your account.

Contact Us

You are able to contact Emsi for more information, to schedule a demo, or otherwise to submit a question or request. When you use the contact feature of our website, we will collect your first and last name, email, organization or company, area of interest, and the content of your message (which may contain additional personal information you wish to share). You also have the option of providing your telephone number.

We collect this information when you initiate contact with us for the purpose of responding to your email or other communications.

Subscribe to Alerts and Updates

You have the option of registering to receive alerts, updates, and future communications from Emsi. If you

subscribe to receive such communications, we will collect your email address.

We collect this information for the purpose of fulfilling your request and providing you with future communications from Emsi.

Download Report

If you choose to download a report from the Emsi website, we may collect your first and last name and email, along with your organization.

We collect this information for the purpose of providing you with the report and contacting you about your interest in Emsi products and services.

Submit a Job Application

You are able to apply for jobs with Emsi via the website. When you submit a job application, we will collect your resume, first and last name, email address, eligibility to work within the United States, salary expectation, address, current employment status, availability, location preference, and a description of your interest in Emsi. You may also elect to provide your phone number, current employer, links to personal professional websites, references, referral information, and any additional comments and/or cover letter.

We collect this information for the purpose of evaluating your candidacy and contacting you regarding your application.

Information Collected via Web-Based Technology

Behavioral Information

Behavioral information is information about how you use our services, the areas of our site that you visit, what services you access (including what searches your conduct), and information about your computer hardware and software – including your IP address, geolocation, browser and operating system type, domain names, access times, number of visits, and referring website addresses. This information is necessary for

analyzing the use of resources, troubleshooting problems, preventing fraud, and improving our services.

Cookies and Web Beacons

A “cookie” is a text file that websites send to a visitor’s computer or other Internet-connected device to uniquely identify the visitor’s browser or to store information or settings in the browser. Emsi uses cookies and other similar technologies to administer our site and deliver a personalized experience for our users. Cookies enable us to serve secure pages to our users without asking them to sign in repeatedly. Emsi also uses cookies to store non-personally identifying information about you such as past searches conducted by your computer. We do this in order to provide a better user experience (e.g., by remembering a user’s preferences when they return to the service). Lastly, Emsi uses cookies to ensure the proper functioning and improve the efficiency of our sites. Most internet browsers enable you to erase cookies from your computer hard drive, block all cookies, or receive a warning before a cookie is stored. Please be aware, however, that some Emsi features or services may not function properly without cookies.

Emsi uses third party web analytics service providers to track activity on Emsi’s sites. The providers use cookies to collect information regarding our users’ visits to the sites (including IP addresses) and the resources they access on the Sites. The providers supply us with reports based on this information in order to help us understand how visitors engage with the sites, and to allow Emsi to advertise our services to visitors when they navigate to other websites. Emsi alone uses the information collected by the providers, and Emsi does not allow any third-parties to use any of the information collected for their own purposes.

How Information Is Used

How we use your personal data will depend on how you interact with our website and the personal data you have shared with us.

Respond to Your Requests

We use your personal information to respond to your requests, including communications and content downloads. If you ask us to do so, Emsi may use personal information you provide us to contact you about Emsi products and services.

Provide Services

When you set up a user account for one of our licensed software products, you may choose to give us personal information such as name and email address. We will use this data solely to provide our services to you.

Besides the information you provide to us when you set up your user account, our licensed software products collect only behavioral information. We use the information we gather for the purposes of providing our services, operating and improving our services, fostering a positive user experience, and delivering the products and services that we offer to jobseekers and educational institutions.

Enhance Website and User Experiences

We use the information regarding the use of our website to analyze and administer the site and track user movement for web analytics purposes. This website usage information enables us to provide you with an ever-improving site, service, and general offering.

Manage Account

If you create an account, we will use your personal information to administer the account. If necessary, we will also use your personal information to verify your identity and provide you with access to your account should you become locked out or forget your login and password.

Facilitate Products and Services

Career Coach

Our Career Coach product provides you with career and education information to aid in choosing a career or major course of study. We use the information gathered in the same manner as described above for our licensed software products (with the addition that we may use your contact details to respond to any queries that you may have).

Career Coach is a collaborative tool that brings or may bring together four separate parties to make the most of the tool. First, when you use the Career Coach tool, you are an End User of the tool and any of its associated customer services. Second, Emsi is the company that produces the Career Coach tool and hosts it on secure web servers. When you are using the Career Coach tool, you are interacting with software that runs on Emsi servers. Third, an organization, such as a university or private company (“the Organization”) has contracted with Emsi for Emsi to make Career Coach accessible in a customized format. As part Emsi’s contract with the Organization, Emsi agrees to provide the Organization with aggregated, depersonalized demographic information gathered through the Career Coach tool. This allows the Organization to adapt to better meet the needs of its constituents. Emsi has also agreed to provide the Organization with your personal information, when you – the End User – register on Career Coach. Fourth, third parties who provide services that are essential to delivering the Career Coach may receive information that is entered into Career Coach. These Third Parties include financial institutions and payment processors when necessary for the completion or collection of payment, and companies who provide internet transmission and hosting services. Emsi may also from time-to-time make available aggregated, de-personalized demographic information, which is gathered through the Career Coach tool, to other third parties. Because of the anonymous nature of this information, it would be impossible for any third-party user of this data to relate it back to any End User to whom the data actually does relate.

Skills Match

Emsi’s Skills Match tool operates very similarly to Career Coach. The relevant differences are that more Skills Match features require a login for access, and that Skills

Meet Legal and Regulatory Requirements

Match does not require you to provide your name when you create a login.

In certain circumstances, we may be required to disclose your personal information if required by law or court proceeding. We will only share the information we are required to disclose and only when we are required to do so.

Security and Fraud Prevention

When necessary, we will use your personal information to preserve the security of our website, systems, and personal information in our control. If necessary, we will also use your personal information to investigate possible fraud, to identify violations of this privacy policy and our terms and conditions, and to prevent any attempted harm to our users.

Disclosure of Information to Others

We share your personal data when you have granted us permission to do so, when necessary to fulfill our obligations to you, or when we have a legitimate business need to do so.

Affiliate Companies

Emsi and its affiliate companies are under the common control of Strada Education Network. Personal information you provide via the Emsi website may be transferred or otherwise disclosed to other affiliate companies within the Strada Education Network. Any such disclosures to and subsequent uses of your personal information by our affiliate companies will comply with this Statement.

Support Vendors

We may share your information with third parties who help us in the delivery of our own products and services to you. We disclose information to companies and individuals we employ to perform functions on our behalf. Examples include hosting our web servers and analyzing data. They may not share that information with any other third party or use that data for any other purpose. We will remain responsible for any information shared in this way.

Website and Analytics Companies

We share anonymous, aggregate information regarding visitors to our website with third-party website analytics companies. These companies use this aggregate data, which has been stripped of any personally identifying information about you, to provide us with insight regarding our web usage patterns. As we only share anonymous, aggregate data, this information cannot be traced back to you individually by either us or the website analytics vendors.

We use Google Analytics to provide us website usage and analytic reports, which necessitates us sharing your anonymous, aggregate data. You may choose not to share your data with Google by installing the Google Analytics opt-out browser add-on, which instructs your browser not to provide your website usage data to Google Analytics. To opt-out of Google Analytics, visit <https://tools.google.com/dlpage/gaoptout> to install the browser add-on.

Please note that installing the Google Analytics opt-out browser add-on will only disable the use of Google Analytics and will not prevent data from being sent to the website itself or to other web analytics services.

Customer Organizations

If you use the Career Coach or Skills Match products, we will disclose your personal information to the Organization through which you are using the product. We are contractually required to share your personal information with the Organization, and by using the Career Coach or Skills Match products you consent to this disclosure.

Non-Personal Information Disclosure

We may aggregate on an anonymous basis behavioral information and demographic information. Such aggregated data does not identify users individually, and may be made available to the Organization, and Emsi customers.

Legal Requirements

We disclose information if legally required to do so, or at our discretion pursuant to a request from a

governmental entity or if we believe in good faith – after considering your privacy interests and other factors – that such action is necessary to: (a) conform to legal requirements or comply with legal process; (b) protect our rights or property or our affiliated companies; (c) prevent a crime or protect national security; or (d) protect the personal safety of users or the public. Because Emsi is a U.S. company and information collected on our Sites is stored in whole or in part in the United States, your information may become subject to U.S. law.

Sale of Business

We may disclose and transfer such information to a third party who acquires any or all of Emsi's business units, whether such acquisition is by way of merger, consolidation or purchase of all or a substantial portion of our assets or stock. In addition, in the event Emsi becomes the subject of an insolvency proceeding, whether voluntary or involuntary, Emsi or its liquidator, administrator, receiver or administrative receiver may sell, license or otherwise dispose of such information in a transaction approved by the court. You will be notified of the sale of all or a substantial portion of our business to a third party by email or through a prominent notice posted on Emsi's website.

Your Choices About Your Information

We retain information you provide to us by various means in an effort to make your repeat use of our services more efficient, practical and relevant, until you change or remove your personal data as described below. If you use our Career Coach product, you will have the option to establish an account profile. You may have access to, review, correct, update, change, or delete your account profile information at any time. Simply log in to your account, go to your profile, and make the necessary changes. Emsi may, however, retain behavioral and demographic information in an aggregated, anonymous format, which may include information you supplied.

If you wish to delete or close your account or account profile information altogether, you may do so in the Account > Settings section of Career Coach. Emsi will retain an archived copy of your account information as it reasonably

considers necessary for audit and record purposes. We will also retain logs, behavioral, demographic, indirect, and statistical information that may relate to you but do not identify you personally and cannot be connected with you once you have deleted or closed your account.

If you later do not want your information to be processed as described by this Statement, you may revoke your consent to this Privacy Statement. If you wish to do so, please contact us by email at privacy@economicmodeling.com. However, please note that if you do withdraw your consent, you may not be able to use the relevant services and your account and profile information will be deleted.

Important Information

Security

You are responsible for ensuring that your account credentials (your username and password) are kept confidential.

Emsi has implemented technical and organizational measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration or disclosure. Notwithstanding such measures, the Internet is an open system and we cannot guarantee that unauthorized third parties will not be able to defeat those measures or use your personal information for improper purposes. For security purposes, the information you enter in to the Career Coach should not contain any sensitive data that you would not want made available to third parties.

Children

Emsi's tools are not intended for, nor do we knowingly collect information from, children under the age of 13.

Legal

Your data is submitted to Economic Modeling LLC, dba Economic Modeling Specialist International. (Emsi), and is hosted and stored in a database on servers situated in the United States owned and maintained by Economic Modeling LLC, a Delaware limited liability company, whose principal place of business is at 409 S Jackson St, Moscow, Idaho, USA.

We process data both inside and outside the United States. It is important to know that data protection laws in the United States may not be as strong as those in your country. Where we transfer your personal information from the European Economic Area (“EEA”) to a location outside the EEA, we will only transfer your data if an appropriate level of protection for your personal data is guaranteed, such as where we have contractual obligations to protect or transfer data with certain safeguards in place. To ensure the continued protection of your personal data while in our care, we take appropriate organizational and technical measures. In addition, we may transfer your personal data if one of the legal exceptions for such transfer can be invoked, such as with your consent or in execution of an agreement you have with us.

Your California Rights

Collection and Use of Personal Information

We may collect certain information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a consumer or household (“Personal Information”). Personal information does not include de-identified or aggregated information. Please see the following disclosure regarding what we may collect, use, and share. This disclosure applies to information we do not collect directly from you. Our use of directly-collected information is described above.

Categories of Personal Information that may be Collected (preceding 12 months)	Category of Sources from which the Information was Collected	The Business or Commercial Purpose(s) for which the Information was Collected	The Categories of Third Parties with which we may share the Personal Information
Categories of personal information described in Cal. Civ. Code § 1798.80(e), including name, address, email, telephone number, education, employment, and employment history (e.g., jobs held, compensation, etc.).	We collect this information from third-party data-services providers.	<ul style="list-style-type: none"> • to provide our products and services; • to improve the quality, safety, and security of our products and services; • to develop new products and services; • to customize and improve communication content; 	Our customers and service providers.

		<ul style="list-style-type: none"> • to comply with legal, regulatory or contractual requirements; • to evaluate or conduct a merger, divestiture, acquisition, restructuring, reorganization, dissolution, or other sale or transfer of all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us is among the assets transferred; • to debug to identify and repair errors that impair existing intended functionality. 	
Education information, defined as information that is not publicly available personally-identifiable information as defined in the FERPA, 20 USC 1232g.	We collect this information from educational institutions.	Solely to perform institutional functions on behalf of the institution providing the information.	We do not share this data with any third-parties.

We do not knowingly collect, or provide to any third party, personal information of minors under 16 years of age.

Your Right to Opt-Out

You have the right to opt out of Emsi selling your personal information at any time. In order to exercise this right, you can either submit a request via our webform at: <https://www.economicmodeling.com/privacy-request/>, or use one of the other methods described below in “Submitting a Request”.

Your Other Rights Under the CCPA

Under the California Consumer Privacy Act, you have the following right with respect to your data we collect:

- The right to request what personal information of yours we have collected, used, disclosed, and sold within the 12 months preceding your request.
- The right to request that we delete your personal information.
- The right to receive non-discriminatory treatment from us if you exercise your rights.
 - We will not penalize you in any way for exercising your rights under the CCPA. If you request that we delete your information, we will no longer be able to provide you services and features that require your personal information, but we will not limit your access to any other features because of your request for information, request to delete, or request to opt out.
- The right to have an authorized agent make a request on your behalf.
 - You may decide to have an authorized agent exercise your rights on your behalf. If you do so, we may require the agent to provide us with proof of your written and signed permission to act on your behalf. [Follow this link](#): to access a sample form for your convenience. In addition to the form, we may need to verify your identity and confirm your authorization of your agent by contacting you directly.

Submitting a Request

If you wish to submit a request for Emsi to disclose what personal information of yours we have, for Emsi to delete your personal information, or to opt out of Emsi selling your personal information, you may do so by submitting a request via our web form at: <https://www.economicmodeling.com/privacy-request/>, or by:

- Calling toll-free at: 1-888-984-2511; or
- Emailing at: privacy@economicmodeling.com.

If you submit a request, we will respond within 10 business days confirming receipt of your request. We will either comply with your request, or explain why we cannot comply with your request, within 45 calendar days of receiving your request. If we are unable to comply within that time period, we will let you know and will comply within an additional 45 calendar days.

Complying with a Request

Prior to complying with a request, we will attempt to verify your identity. This may require you to provide us with several items of personal information for us to cross-reference with our own records (we will only use the information you provide us for the purposes of verifying your identity). If you are a user of one of our products, we will verify your identity using your account information. If we are unable to verify your identity, we will inform you of that fact and will not comply with your request.

European Data Subjects

Emsi is GDPR compliant, and is self-certified under the EU-US Privacy Shield framework. You can view our certification at:

<https://www.privacyshield.gov/participant?id=a2zt00000008QtyAAE&status=Active>.

Emsi follows its Privacy Shield Policy in the processing of all GDPR-covered data. You can view Emsi's Privacy Shield policy at:

<https://www.economicmodeling.com/wp-content/uploads/2019/07/Emsi-Privacy-Shield-Policy.pdf>.

Contact Information

If, at any time, you have questions or concerns about this Privacy Statement or believe that we have not adhered to this Statement, please feel free to contact us by phone, email, or at the address above.

We will use reasonable efforts to promptly answer your question or resolve your problem.

Updates and Changes

We will post a prominent notice on our websites to notify you of any significant changes to our Privacy Policy and indicate at the bottom of the notice when it was most recently updated. If we make material changes to the policy that will affect previously collected Personal Information, you will be notified and asked to consent to the updated Privacy Policy.

You can download a copy of this Statement by clicking this link:

INSERT ADDRESS OF PDF.

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