

Everly Design Group Corp. – Privacy Policy

1) Introductions

Everly Design Group Corp. is committed to protecting your privacy.

This statement is made in the light of the requirements of the General Data Protection Regulation (GDPR), and the California Privacy Act of 2018 (CCPA of 2018), to alert users to Everly Design Group Corp. data processing practices which will govern the processing of your personal data.

GDPR and the CCPA of 2018 not only applies to organizations located within the EU but also to organizations located outside of the EU if they offer goods or services to, or monitor the behavior of, EU and California data subjects. It applies to all companies processing and holding the personal data of data subjects residing in the European Union and California, regardless of the company's location. Whilst we understand this means it does not include non-EU citizens, we believe at Everly Design Group Corp. it is important to protect individual's personal data regardless of their nationality and therefore we look to apply the same standards across all individual's personal data regardless of their nationality.

As the controller, Everly Design Group Corp. adheres to numerous technical and organizational measures to ensure the most complete protection of personal data processed through this website. However, Internet-based data transmissions may in principle have security gaps, so absolute protection may not be guaranteed. For this reason, every data subject is free to transfer personal data to us via alternative means, e.g., by telephone.

2) Definitions

The data protection declaration of Everly Design Group Corp. is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation (GDPR) and the California Privacy Act of 2018 (CCPA of 2018). Our data protection declaration should be legible and understandable for the general public, as well as our clients and business partners. To ensure this, we would like to first explain the terminology used.

In this data protection declaration, we use, among others, the following terms:

a) Personal data

Personal data means any information relating to an identified or identifiable natural person ("data subject"). An identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

b) Data subject

Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

c) Processing

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

d) Restriction of processing

Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future.

e) Profiling

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements.

f) Controller or controller responsible for the processing

Controller or controller responsible for the processing is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

g) Processor

Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

h) Recipient

Recipient is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

i) Third party

Third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

j) Legitimate Interest

Legitimate Interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party or party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

3) Data controller

Everly Design Group Corp. acts as a data controller (Art. 24) for (i) the personal data relating directly to its clients and (ii) for its own employee management purposes.

4) Data processor

Everly Design Group Corp. will from time to time act as a data processor (Art. 28) and may supply personal data to third party service providers, contractors and agents that provide services to us, to support the completion of projects and events (in which case our client is the controller).

Where we share personal data with sub-processors, we will use all reasonable means to ensure that they only process this information in accordance with this Privacy Policy.

5) Legal basis for processing personal data

(Art. 6.1) lit. a GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the case, for example, when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on (Art 6.1) lit. b GDPR. The same applies to such processing operations which are necessary for carrying out pre-contractual measures, for example in the case of inquiries concerning our products or services. If Everly Design Group Corp. is subject to a legal obligation by which processing of personal data is required, such as for the fulfilment of tax obligations, the processing is based on (Art. 6.1) lit. c GDPR. In rare cases, the processing of personal data may be necessary to protect the vital interests of the data subject or of another natural person. This would be the case, for example, if a data subject were injured and his name, age, health insurance data or other vital information would have to be passed on to a doctor, hospital or other third party. Then the processing would be based on (Art. 6.1) lit. d GDPR. Finally, processing operations could be based on (Art 6.1) lit. f GDPR. This legal basis is used for processing operations which are not covered by any of the above-mentioned legal grounds, if processing is necessary for the purposes of the legitimate interests pursued by Everly Design Group Corp. or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. Such processing operations are particularly permissible because they have been specifically mentioned by the European legislator. He considered that a legitimate interest could be assumed if the data subject is a client of the controller (Recital 47 Sentence 2 GDPR).

6) Legal basis for processing personal data – Legitimate Interest

We have decided that the legal basis for our processing of your personal data is ‘Legitimate Interest’ to carry out our business, including to grow and improve our services and support our clients, provided those interests are not outweighed by your rights and interests. We have conducted a Legitimate Interest Assessment (LIA) to arrive at this decision, if you wish to receive a copy of this LIA, please contact to Info@EDGFurniture.com to request a PDF of the LIA.

7) Data Processing of Special Category data

We may be required to process special category data which includes such items as medical history, passport information etc. (Art. 9) to facilitate the successful completion of projects, in this case we will only undertake this processing following explicit consent being obtained by the individual data subjects either by ourselves directly, or via our clients who have commissioned us to undertake the specific project. (Art. 9.2a)

8) What information do we collect and why?

We will obtain personal information from you when you enquire about our activities, website, register with us, attend one of our events or otherwise provide us with personal information.

The types of information collected might include names, e-mail address, postal address, telephone number, mobile phone number, credit/debit card details and dietary or access requirements.

9) What do we do with the information?

We will use the information you provide to:

- fulfill your requests – such as provision of information about our services
- process sales transactions, or other payments and verify financial transactions
- handle event/service orders; deliver products and communicate with you about event/service orders
- provide a personalized service to you when you visit our websites – this could include customizing the content and/or layout of our pages for individual users
- record any contact we have with you
- prevent or detect fraud or abuses of our websites and enable third parties to carry out technical, logistical or other functions on our behalf
- communicate with our supplier partners, supporters and collaborators to fulfill our contractual obligations
- provide you with information that we think may be of interest to you.

We may use generic photographs taken at our events for promotional purposes. In the event we use identifiable images of individuals, we will have sought and obtained written consent.

10) Sharing your information

We will only share your information if:

- We are legally required to do so, e.g., by a law enforcement agency legitimately exercising a power, if compelled by an order of the Court.
- We believe it is necessary to protect or defend our rights, property or the personal safety of our people or visitors to our premises or websites.

We are working with carefully-selected partners that are carrying out work on our behalf. These ethically-trusted partners may include, suppliers and accountants. The kind of information we may ask them to do includes sending emails, processing card payments, etc. We only choose partners we can trust. Because we are based in the U.S.A, some of our suppliers may process data outside the EU, but we only share data with such recipients where appropriate standards and safeguards are in place. Whenever we share or transfer your personal information, we comply with the standards set by the GDPR, the CCPA of 2018, and this privacy statement at a minimum.

11) Storing your information

We take appropriate measures to ensure that the information disclosed to us is kept secure, accurate and up to date and kept only for so long as is necessary for the purposes for which it is used. We have security measures in place to attempt to protect against the loss, misuse and alteration of personal data under our control. For example, only authorized personnel can access user information. While we cannot ensure or guarantee that loss, misuse or alteration of data will not occur while it is under our control, we use our best efforts to try to prevent this.

12) Retaining your information – data retention policy

If you have received marketing communications from Everly Design Group Corp. under our privacy policy and have not unsubscribed, you will be on our marketing communications mailing list unless you unsubscribe.

Where we hold subject data to facilitate the successful completion of business activities Everly Design Group Corp. will hold hard copies of this information for a maximum period of seven years. Everly Design Group Corp. will maintain an electronic copy of the pertinent program information indefinitely unless you request removal of this information under your right to erasure (Art.17).

13) Website cookies policy

We may use cookies to provide accurate monitoring reports to help us understand our users' interests and preferences, to ensure that our website is as user friendly as possible.

Our website may use Google Analytics, a service provided by Google LLC that uses cookies to help the website analyze how users use this site. The cookies will generate information about your use of the website, and this along with your IP address will be stored on servers in the United States by Google LLC. This information is retained for the purposes of evaluating and compiling reports on website activity and for other services relating to internet usage. This information may be transferred to third parties by Google LLC where required to do so by law, or where such third parties process the information on their behalf. Your IP address will not be associated with any other data held by Google LLC.

If you do not agree to the processing of data about you by Google LLC in the manner and for the purposes set out above, you can select 'disable cookies' on your browser.

14) Data protection provisions about the application and use of Google Analytics

On this website, the controller has integrated the component of Google Analytics. Google Analytics is a web analytics service. Web analytics is the collection, gathering, and analysis of data about the behavior of visitors to websites. A web analysis service collects, among others, data about the website from which a person has come (the so-called referrer), which sub-pages were visited, or how often and for what duration a sub-page was viewed. Web analytics are mainly used for the optimization of a website and to carry out a cost-benefit analysis of Internet advertising.

The operator of the Google Analytics component is Google LLC, 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, United States.

The purpose of the Google Analytics component is to analyze the traffic on our website. Google uses the collected data and information, among others, to evaluate the use of our website and to provide online reports, which show the activities on our websites, and to provide other services concerning the use of our Internet site for us.

Google Analytics places a cookie on the information technology system of the data subject. The definition of cookies is explained above. With the setting of the cookie, Google is enabled to analyze the use of our website. With each call-up to one of the individual pages of this Internet site, which is operated by the controller and into which a Google Analytics component was integrated, the Internet browser on the information technology system of the data subject will automatically submit data through the Google Analytics component for online advertising and the settlement of commissions to Google. During this technical procedure, the enterprise Google gains knowledge of personal information, such as the IP address of the data subject, which serves Google, among others, to understand the origin of visitors and clicks, and subsequently create commission settlements.

The cookie is used to store personal information, such as the access time, the location from which the access was made, and the frequency of visits of our website by the data subject. With each visit to our Internet site, such personal data, including the IP address of the Internet access used by the data subject, will be transmitted to Google in the United States of America. These personal data are stored by Google in the United States of America. Google may pass these personal data collected through the technical procedure to third parties.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent Google Analytics from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by Google Analytics may be deleted at any time via a web browser or other software programs.

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In addition, the data subject has the possibility of objecting to a collection of data that are generated by Google Analytics, which is related to the use of this website, as well as the processing of this data by Google and the chance to preclude any such. For this purpose, the data subject must download a browser add-on under the link <https://tools.google.com/dlpage/gaoptout> and install it. This browser add-on tells Google Analytics through a JavaScript, that any data and information about the visits of Internet pages may not be transmitted to Google Analytics. The installation of the browser add-ons is considered an objection by Google. If the information technology system of the data subject is later deleted, formatted, or newly installed, then the data subject must reinstall the browser add-ons to disable Google Analytics. If the browser add-on was uninstalled by the data subject or any other person who is attributable to their sphere of competence, or is disabled, it is possible to execute the reinstallation or reactivation of the browser add-ons.

Further information and the applicable data protection provisions of Google may be retrieved under <https://www.google.com/intl/en/policies/privacy/> and under <http://www.google.com/analytics/terms/us.html>. Google Analytics is further explained under the following Link <https://www.google.com/analytics/>.

15) Data protection provisions about the application and use of Facebook

On this website, the controller has integrated components of the enterprise Facebook. Facebook is a social network.

A social network is a place for social meetings on the Internet, an online community, which usually allows users to communicate with each other and interact in a virtual space. A social network may serve as a platform for the exchange of opinions and experiences; or enable the Internet community to provide personal or business-related information. Facebook allows social network users to include the creation of private profiles, upload photos, and network through friend requests.

The operating company of Facebook is Facebook, Inc., 1 Hacker Way, Menlo Park, CA 94025, United States. If a person lives outside of the United States or Canada, the controller is the Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

With each call-up to one of the individual pages of this Internet website, which is operated by the controller and into which a Facebook component (Facebook plug-ins) was integrated, the web browser on the information technology system of the data subject is automatically prompted to download display of the corresponding Facebook component from Facebook through the Facebook component. An overview of all the Facebook Plug-ins may be accessed under <https://developers.facebook.com/docs/plugins/>. During this technical procedure, Facebook is made aware of what specific sub-site of our website was visited by the data subject.

If the data subject is logged in at the same time on Facebook, Facebook detects with every call-up to our website by the data subject—and for the entire duration of their stay on our Internet site—which specific sub-site of our Internet page was visited by the data subject. This information is collected through the Facebook component and associated with the respective Facebook account of the data subject. If the data subject clicks on one of the Facebook buttons integrated into our website, e.g., the “Like” button, or if the data subject submits a comment, then Facebook matches this information with the personal Facebook user account of the data subject and stores the personal data.

Facebook always receives, through the Facebook component, information about a visit to our website by the data subject, whenever the data subject is logged in at the same time on Facebook during the time of the call-up to our website. This occurs regardless of whether the data subject clicks on the Facebook component or not. If such a transmission of information to Facebook is not desirable for the data subject, then he or she may prevent this by logging off from their Facebook account before a call-up to our website is made.

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The data protection guideline published by Facebook, available at <https://facebook.com/about/privacy/> provides information about the collection, processing and use of personal data by Facebook. In addition, it is explained there what setting options Facebook offers to protect the privacy of the data subject. In addition, different configuration options are made available to allow the elimination of data transmission to Facebook. These applications may be used by the data subject to eliminate a data transmission to Facebook.

16) Data protection provisions about the application and use of Instagram

On this website, the controller has integrated components of the service Instagram. Instagram is a service that may be qualified as an audio-visual platform, which allows users to share photos and videos, as well as disseminate such data in other social networks.

The operating company of the services offered by Instagram is Instagram LLC, 1 Hacker Way, Building 14 First Floor, Menlo Park, CA, UNITED STATES.

With each call-up to one of the individual pages of this Internet site, which is operated by the controller and on which an Instagram component (Insta button) was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to the download of a display of the corresponding Instagram component of Instagram. During the course of this technical procedure, Instagram becomes aware of what specific sub-page of our website was visited by the data subject.

If the data subject is logged in at the same time on Instagram, Instagram detects with every call-up to our website by the data subject—and for the entire duration of their stay on our Internet site—which specific sub-page of our Internet page was visited by the data subject. This information is collected through the Instagram component and is associated with the respective Instagram account of the data subject. If the data subject clicks on one of the Instagram buttons integrated on our website, then Instagram matches this information with the personal Instagram user account of the data subject and stores the personal data.

Instagram receives information via the Instagram component that the data subject has visited our website provided that the data subject is logged in at Instagram at the time of the call to our website. This occurs regardless of whether the person clicks on the Instagram button or not. If such a transmission of information to Instagram is not desirable for the data subject, then he or she can prevent this by logging off from their Instagram account before a call-up to our website is made.

Further information and the applicable data protection provisions of Instagram may be retrieved under <https://help.instagram.com/155833707900388> and <https://www.instagram.com/about/legal/privacy/>.

17) Data protection provisions about the application and use of LinkedIn

The controller has integrated components of the LinkedIn on this website. LinkedIn is a web-based social network that enables users with existing business contacts to connect and to make new business contacts. Over 400 million registered people in more than 200 countries use LinkedIn. Thus, LinkedIn is currently the largest platform for business contacts and one of the most visited websites in the world.

The operating company of LinkedIn is LinkedIn, 2029 Stierlin Court Mountain View, CA 94043, United States. For privacy matters outside of the United States LinkedIn Ireland, Privacy Policy Issues, Wilton Plaza, Wilton Place, Dublin 2, Ireland, is responsible.

With each call-up to one of the individual pages of this Internet site, which is operated by the controller and on which a LinkedIn component (LinkedIn plug-in) was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to the download of a display of the corresponding LinkedIn component of LinkedIn. Further information about the LinkedIn plug-in

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<https://developer.linkedin.com/plugins> may be accessed. During this technical procedure, LinkedIn gains knowledge of what specific sub-page of our website was visited by the data subject.

If the data subject is logged in at the same time on LinkedIn, LinkedIn detects with every call-up to our website by the data subject—and for the entire duration of their stay on our Internet site—which specific sub-page of our Internet page was visited by the data subject. This information is collected through the LinkedIn component and associated with the respective LinkedIn account of the data subject. If the data subject clicks on one of the LinkedIn buttons integrated on our website, then LinkedIn assigns this information to the personal LinkedIn user account of the data subject and stores the personal data.

LinkedIn receives information via the LinkedIn component that the data subject has visited our website, provided that the data subject is logged in at LinkedIn at the time of the call-up to our website. This occurs regardless of whether the person clicks on the LinkedIn button or not. If such a transmission of information to LinkedIn is not desirable for the data subject, then he or she may prevent this by logging off from their LinkedIn account before a call-up to our website is made.

LinkedIn provides under Guest Controls <https://www.linkedin.com/psettings/guest-controls>, the possibility to unsubscribe from e-mail messages, SMS messages and targeted ads, as well as the ability to manage ad settings. LinkedIn also uses affiliates such as Eire, Google Analytics, BlueKai, DoubleClick, Nielsen, Comscore, Eloqua, and Lotame. The setting of such cookies may be denied under <https://www.linkedin.com/legal/cookie-policy>. The applicable privacy policy for LinkedIn is available under <https://www.linkedin.com/legal/privacy-policy>. The LinkedIn Cookie Policy is available under <https://www.linkedin.com/legal/cookie-policy>.

18) Data protection provisions about the application and use of You Tube

On this website, the controller has integrated components of You Tube. YouTube is an Internet video portal that enables video publishers to set video clips and other users free of charge, which also provides free viewing, review and commenting on them. You Tube allows you to publish all kinds of videos, so you can access both full movies and TV broadcasts, as well as music videos, trailers, and videos made by users via the Internet portal.

The operating company of You Tube is You Tube, LLC, 901 Cherry Ave., San Bruno, CA 94066, United States. The You Tube, LLC is a subsidiary of Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, United States.

With each call-up to one of the individual pages of this Internet site, which is operated by the controller and on which a YouTube component (You Tube video) was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to download a display of the corresponding YouTube component.

Further information about YouTube may be obtained under www.youtube.com/yt/about/en/. During the course of this technical procedure, YouTube and Google gain knowledge of what specific sub-page of our website was visited by the data subject.

If the data subject is logged in on YouTube, YouTube recognizes with each call-up to a subpage that contains a YouTube video, which specific sub-page of our Internet site was visited by the data subject. This information is collected by YouTube and Google and assigned to the respective You Tube account of the data subject.

YouTube and Google will receive information through the You Tube component that the data subject has visited our website, if the data subject at the time of the call to our website is logged in on You Tube; this occurs regardless of whether the person clicks on a YouTube video or not. If such a transmission of this information to YouTube and Google is not desirable for the data subject, the delivery may be prevented if the data subject logs off from their own You Tube account before a call-up to our website is made. You Tube's data protection provisions, available at www.google.com/intl/en/policies/privacy/, provide information about the collection, processing and use of personal data by YouTube and Google. (Version 1.0)

19) Data protection provisions about the application and use of Vimeo

This website has integrated components of the video portal Vimeo.

Provider is Vimeo Inc., 555 West 18th Street, NY, New York 10011, USA.

If you visit any of our sites equipped with a Vimeo plugin, you will be connected to Vimeo's servers. This tells the Vimeo server which of our pages you have visited. In addition, Vimeo obtains your IP address. This also applies if you are not logged in to Vimeo or do not have an account with Vimeo. The information collected by Vimeo is transmitted to the Vimeo server in the United States.

If you are logged in to your Vimeo account, you allow Vimeo to associate your surfing behavior directly with your personal profile. You can prevent this by logging out of your Vimeo account. For more information on how to deal with user data, see the Vimeo Privacy Policy <https://vimeo.com/privacy>.

20) Mailing lists

If you subscribe to our mailing list, you will be automatically subscribed to receive email updates.

We use MailChimp to manage our email marketing. MailChimp stores their data in the US, they comply with the EU-U.S. Privacy Shield Framework and the Swiss – U.S. Privacy Shield Framework. They do share data with third parties but never sell data.

You can change your email marketing preferences at any time, by clicking 'unsubscribe' on any of our emails or by contacting: Info@EDGFurniture.com

21) Your rights

By providing us with your personal data, you consent to the collection and use of any information you provide in accordance with the above purposes and this privacy statement. You have the right to ask for a copy of the information we hold about you and to have any inaccuracies in your information corrected.

If you want to exercise these rights or update your personal details, please contact Info@EDGFurniture.com.

22) Data subject rights

As an individual whose personal data is processed by Everly Design Group Corp. you have the following rights, where applicable:

- [the right to be informed](#) – which is what this privacy policy is for
- [the right to access the data we hold about you the right to object to direct marketing](#) – either use the 'unsubscribe' button on our emails or contact us directly
- [the right to object to processing carried out based on legitimate interests](#)
- [the right to erasure](#) (in some circumstances)
- [the right of data portability](#)
- [the right to have your data rectified if its inaccurate](#)
- [the right to have your data restricted or blocked from processing](#)

To exercise any of these rights, please email Info@EDGFurniture.com to get in touch.

We reserve the right to amend this privacy statement. If we do so, we will post notice of the change on our website and you will be deemed to have accepted such changes.

23) Employees and job applicants

If you apply to work at Everly Design Group Corp. we will only use the information you give us to process your application and to monitor recruitment statistics. If we want to disclose information to someone outside Everly Design Group Corp. - for example, if we need a reference, or need to get a 'disclosure'

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from the Criminal Records Bureau - we will make sure we tell you beforehand, unless we are required to disclose this information by law.

If you are unsuccessful in your job application, we will hold your personal information for 12 months after we finish recruiting the post you applied for. After this date we will destroy or delete your information.

If you begin employment with us, we create a file about your employment. We keep the information in this file secure and will only use it for matters that apply directly to your employment.

Once you stop working for us, we will keep this file according to our record retention guidelines. You can contact us, Info@EDGFurniture.com to find out more about this.

This policy was last updated March 24, 2020.