
Web Privacy Policy**Policy No. OSC-OSC-xx**

Policy Owner: Optimum Solutions Corporation (OSC)

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Overview

This Privacy Policy describes how Optimum Solutions Corp. and its subsidiaries, affiliates and related entities ("OSC," "We," "Our") collects, uses, discloses, transfers, and stores your personal information as we engage with you to provide our products, services and content. We encourage you to review this information so that you may understand and consent to how we may collect, use, and share your personal information.

The current version of our Privacy Notice can be found at: <https://www.oscworld.com/privacy-policy/>

OSC respects individual privacy and values the confidence of its customers, clients, and business partners. Not only do we strive to process and store personal information in a manner consistent with the laws of the countries in which we do business, but we also have a tradition of upholding the highest ethical standards in our business practices. OSC is fully committed to transparency and compliance with applicable laws and regulations. This Privacy Policy (the "Policy") sets forth the privacy principles OSC follows with respect to transfers of personal information from the EEA to the United States.

Student Data Privacy Notice

OSC may collect or process personally identifiable information (PII) when working with educational institutions. The types of data we may collect include names, contact information, academic information, and other data elements provided by the educational agency.

In compliance with NY Education Law 2-d:

- We do not sell or use student data for commercial purposes.
- We use such data only for purposes explicitly authorized in our contract with the educational agency.
- We maintain encryption in transit and at rest in accordance with NIST standards.
- We use technical, administrative, and physical safeguards to protect PII.
- We ensure that all employees with access to PII receive annual data privacy and security training.
- Any third-party subcontractor we work with must agree in writing to adhere to the same privacy and security standards as required by 2-d and FERPA.
- We will return or securely destroy student data upon termination of the contract unless otherwise required by law.
- In the event of a data breach, we will notify the educational agency no later than 7 calendar days after discovery.
- Parents (or eligible students) have the right to:
 - Inspect and review their child's education records.
 - File complaints about possible breaches of student data.

- OSC does not sell student data or use it for marketing or commercial purposes.
- Parents (or eligible students, as defined by law) have the right to inspect and review their education records.

Complaints regarding breaches may be submitted to the NY State Education Department Chief Privacy Officer at: <http://www.nysed.gov/data-privacy-security/report-improper-disclosure>

A list of student data elements collected and the purposes for collection, as well as data storage locations, may be requested through the contracting educational agency.

What Information We Collect

In order to provide our products, services, and content for our customers and clients, we must collect certain personal information from and about you. OSC does not sell personal information.

The types of personal information collected, processed, and stored by OSC will be limited to those which are required to establish and maintain the use of the products, services, and content we provide. This information has been collected and transferred to third parties within the last 12 months. Such information may include:

- Information We Collect Directly from You:
 - Name
 - Address
 - Company Name
 - Contact Information (phone number and e-mail address)
 - Any Personal Data you provide us when purchasing products
 - Any Personal Data you provide when you communicate with us or our customer service representatives (so please only provide what is necessary).
- Information We Automatically Collect When You Use Our Site:
 - We don't employ tracking devices for marketing purposes ("cookies", "web beacons," single-pixel gifs"). The only data we collect is data you provide via the contact page.
- Information We Collect from Other Sources:
 - Name
 - Company Name
 - Position
 - Contact Information (phone number and e-mail address)

OSC's service is not directed at children. We do not knowingly collect personally identifiable information from children under the age of 16.

How We Use Personal Information

OSC will use the information it collects to:

- Establish and maintain merchandising, product and customer relations-related services as well as respond to inquiries or perform other tasks that are necessary when acting as a supplier of our products or services.

- Create, build, or enhance customer and client profiles for marketing and sales purposes.
- Comply with legal obligations or other legal purposes, such as audit, security, fraud prevention, or preserving and defending OSC's legal rights.

Data that has been anonymized does not personally identify you and is not covered by this Privacy Statement.

OSC will retain your personal information only as long as it is necessary to provide our products and services, except where retention of personal information is necessary for compliance with a law, regulation, or other legal authority, or is otherwise permitted to be maintained for other legal purposes, such as audit, security, fraud prevention, or preserving and defending OSC's legal rights.

Sharing, Disclosure and Transfer to Third Parties

We do not sell personal data to any third party.

Your information may be shared with third-party service providers or other external entities that may be engaged in assisting us in managing the processes required to meet our obligations as a supplier of products and services or when required to do so by applicable law. Any engagement of a third-party service provider will be governed by appropriate contractual requirements prohibiting the use of your information for any purpose beyond those specifically directed by OSC and requiring that they ensure sufficient administrative and technical security mechanisms are in place to prevent your information from being improperly used, disclosed, or accessed.

As a result of the operations and services we provide, the sharing of your information with other service providers and partners may result in your data being sent to countries outside of your country of residence, which may have data protection laws that differ from those in your country of residence. Regardless of the source or destination location of your information, OSC will protect your information as described in this Privacy Statement and abide by all applicable data protection laws. OSC remains responsible for information that we share with third parties for processing on our behalf.

For individuals located in the European Economic Area ("EEA") or Switzerland, when transfers to third parties outside of the EEA or Switzerland occur, OSC will put sufficient protections in place to ensure compliance with the applicable data protection laws.

Access to Personal Information

You have the right to request access to, correct inaccuracies, or request deletion of your personal information, subject to certain legal exceptions. Requests may be submitted to:

Email: privacy@oscworld.com

Mailing Address:

Optimum Solutions Corp. Attn: Privacy Officer
170 Earle Avenue Lynbrook, NY. 11563

Only you or a person registered with the California Secretary of State, if you are a California Resident, that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

To submit a verifiable request, please initially provide the following information using the contact information in the "Access to Personal Data" section of this policy.

- Name
- Contact Information (Email Address and Phone Number)

Once you submit your verifiable consumer request, we will attempt to verify your identity by matching the information you provided us with the information in our systems. If you submit a request to know specific pieces of personal information or a request to delete certain information, additional steps may be taken to validate your identity and the request prior to processing.

We will generally avoid requesting additional information from you to verify you. However, if we cannot verify your identity based on the information originally provided or what we currently maintain, we may request additional information from you, which will only be used to verify your identity and for security or fraud-prevention purposes. We will delete any new personal information we collect to verify your identity as soon as practical after processing your request unless otherwise required by law.

If we are unable to verify your identity, we will deny your request and inform you of our inability to verify your identity and explain why we were unable to do so.

Please note that we are only required to respond to your request for access to your personal information twice within a 12-month period.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA or Privacy rights.

OSC is committed to treating all individuals with fairness and respect in accordance with applicable privacy laws. We do not discriminate against any individual for exercising their privacy rights under applicable laws, including but not limited to the California Consumer Privacy Act (CCPA), the General Data Protection Regulation (GDPR), the New York Education Law 2-d, and any other federal or state privacy law.

If you believe you have been subject to discriminatory treatment in connection with your privacy rights, you are encouraged to contact us as described in the "Access to Personal Data" section of this policy.

Questions Regarding the Privacy Policy or Use of Personal Data

We welcome your comments or questions about this Privacy Notice or our practices regarding your personal information. If you wish to inquire about this Privacy Policy, our practices, or exercise your privacy rights you may also contact us as described in the "Access to Personal Data" section of this policy.

Privacy Policy Changes and Notifications

OSC may update its Privacy Policy from time to time. Use of information we collect now is subject to the current version of our Privacy Policy. Please check back for updates.