

# The Florida Dysphagia Institute (“FDI”) Privacy Policy

## 1. General Policy

### A. Acceptance of Terms

The Florida Dysphagia Institute. (“FDI”) is committed to protecting Your privacy when You visit the FDI website located at the URL [www.FDI2.com](http://www.FDI2.com) (“FDI2 Website”). This Privacy Policy explains to You how we collect and use Your information. This document should be read in conjunction with the FDI Terms and Conditions, and we reserve the right to append or otherwise modify this privacy statement at any time.

### B. Term Definitions

1. The term “FDI2 Website” refers to the Florida Dysphagia Institute website accessible through the URL [www.FDI2.com](http://www.FDI2.com).
2. The term “FDI” refers to FDI LLC.
3. The term “User Profile” refers to a profile posted by a User on the Website.
4. The terms “You”, “Your” and/or “User” refer to any individuals and/or entities visiting and/or otherwise accessing the FDI Website for any reason.
5. The term “Content” refers to all information, data, text, software, music, sound, photographs, graphics, video, messages, tags, or other materials posted and/or otherwise displayed on, to, or at the FDI2 Website.
6. The term “Personal Information” includes, but is not limited to, any information that identifies or describes an individual, including his or her name, professional licensing information, social security number, physical description, age, gender, marital status, health status, financial status, home address, home telephone number, education, financial matters, and medical or employment history. Personal Information may also include statements made by, or attributed to, a User.

### C. Collection of User Data

FDI collects user data during registration and use of the FDI2 Website and associated services such as described below with the consent of the user and for the legitimate business purpose of providing the services offered by the FDI2 Website.

## II. Your Personal Information

### A. Information Collected by FDI

Information such as Your name and email address is collected at the FDI2 Website when You:

- (i) register for any Course offered by or via the FDI2 Website or its Deglut-Ed-Thinkific Link
- (ii) sign up for any e-mail alerts or communications;
- (iii) provide information voluntarily to FDI via the FDI2 Website.

Additional information is collected through your use of the site, including completion of courses and/or exercises. Personal Information is provided at your own risk. By providing your Personal Information, you are communicating Your consent to FDI for collection, use and disclosure of such Personal Information for the purposes for which You provided the information to FDI, and as described in this Privacy Policy.

### B. Data Controller

For the majority of the information maintained, collected, or used by FDI, FDI is the data controller who is responsible for determining the purpose and means of processing personal data.

## C. Using Your Information

Information is collected about You in order to establish and enhance our relationship with You. FDI's use of this information includes the following: (i) to personalize Your experience, so we are better able to respond to Your individual needs; (ii) improve our website through Your feedback; (iii) more effectively responding to customer service requests and support needs and improve customer service; (iv) process transactions; (v) contacting You; (vi) conducting research and compiling aggregate data for internal and external business purposes; and (vii) any other purpose disclosed to You at the time we collect Your information.

Much of the information collected by FDI is necessary for proper functioning of the FDI2 Website and use of the FDI products. For example, You may not be able to create a user account or reset your password without provision of a valid email address. In these situations, if You choose to withhold any personal data requested by FDI, it may not be possible for You to gain access to certain parts of the site.

## D. Updating and Deleting Your Information

On FDI or its Thinkific link You are able to correct, update, review, or delete information You have submitted by going back to the specific tool and making the desired changes. If You refuse to consent to, opt out of, or withdraw Your consent, we may not be able to offer You certain services or benefits. If at any point You wish for FDI to delete information about You, please contact us at [floridadyspagiainst2@gmail.com](mailto:floridadyspagiainst2@gmail.com).

## E. Information Sharing and Disclosure

We may share Your information with trusted third parties who assist us in operating our website, conducting our business, or serving You, as long as those parties agree to keep this information confidential to the extent outlined under this Privacy Policy and consistent with applicable laws and regulations. We may also release Your information when we believe it is needed to comply with the law, enforce our site policies, or protect ours or others rights, property, or safety. Non-personally identifiable information may be provided to other parties for marketing, advertising, or other uses.

## F. Changes in FDI LLC.

If FDI is sold, merged, or otherwise transferred, personal information may be transferred along with it.

## G. Additional Information Use

We may use Your email for transactional purposes, as well as for promotional purposes. Transactional purposes include confirmation and notification of changes to Your account. Promotional purposes include sending You newsletters about new features, special offers, promotional announcements, consumer surveys, and other items concerning our service. During registration at the FDI Website, You may be signed up to receive promotional email newsletters from FDI, unless disallowed by Your jurisdiction of residence. Email messages may contain code that enables our database to track Your usage of the emails to determine whether the email was opened and what links, if any, were clicked. Should You prefer not to receive promotional emails from us, please edit the preferences in Your account menu or click Unsubscribe at the bottom of any promotional emails.

## H. Access to Information

Users may have a right to request access to some of the information FDI collects. You can request such access by contacting us at [floridadyspagiainst2@gmail.com](mailto:floridadyspagiainst2@gmail.com). Upon verification of Your identity, we will make sure to provide You with a copy of the data we process about You.

## I. International Privacy Laws

If You are accessing the FDI Website and its affiliated services from outside the United States, please be aware that You are sending information (including Personal Data) to the United States where our servers are located.

## III. Automatically Collected Information

As You use FDI, certain information may also be passively collected and stored on our or our service providers' server logs, including Your Internet protocol address, browser type, and operating system. We also use Cookies and navigational data like Uniform Resource Locators (URL) to gather information regarding the date and time of Your visit and the solutions and information for which You searched and viewed, or on which of the advertisements displayed on FDI You clicked. This type of information is collected to make FDI and solutions more useful to You and to tailor the experience to meet Your interests and needs.

We engage in remarketing to market our sites across the web. When a user visits our site, a cookie is dropped on the user. Users with this cookie may be targeted across advertising networks to receive relevant advertisements. You may opt out of this ad serving using the Network Advertising Initiative (NAI) opt-out page ([http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp)).

An "Internet protocol address" or "IP Address" is a number that is automatically assigned to Your computer when You use the Internet. In some cases, Your IP Address stays the same from browser session to browser session; but if You use a consumer internet access provider, Your IP Address probably varies from session to session. FDI and/or our service providers, may track Your IP Address when You access FDI to assist with ad targeting.

"Cookies" are small pieces of information that a website sends to Your computer's hard drive while You are viewing a website. We may use both session Cookies (which expire once You close Your web browser) and persistent Cookies (which stay on Your computer until You delete them) to provide You with a more personal and interactive experience with FDI. Persistent Cookies can be removed by following Your Internet browser help file directions.

We may also enable advertisers and ad servers to promote third-party products and/or services by placing advertisements on FDI. These advertisers and ad servers may use Cookies and/or "Web Beacons" (which are usually small, transparent graphic images) in order to monitor information related to served advertisements. Clicking on such advertisements will direct You to the website of a third-party and the advertiser. This Privacy Policy does not cover the privacy practices of any advertisers or ad servers.

## IV. Safety Measures

### A. Internet Security

We use a variety of security measures to maintain the safety of Your personal information when You place an order or access Your personal information: (i) A secure server; (ii) All sensitive/credit information is transmitted via Secure Socket Layer (SSL) technology and then entered into our Payment gateway providers database "Stripe", accessible only to those authorized who are required to keep the information confidential; (iii) All data stored on the FDI Website server(s) is

stored in a database “behind” a secure firewall; (iv) There is no permissible access to the database outside of the hosted environment; and (v) After a transaction, Your credit card information will not be stored on our servers.

## B. Security Limitations Disclaimer

FDI cannot and does not guarantee that Personal Information You post on the FDI Website will not be accessed by unauthorized persons. Despite FDI’s efforts to safeguard Your personal information, there is always a risk of security breach. FDI is not responsible for circumvention of any privacy settings or security measures of the FDI Website. You understand and acknowledge that, even after removal, copies of Personal Information on User Profiles may remain viewable in cached and archived pages or if other Users have copied or stored Your Personal Information.

The FDI Website might be linked to other websites. Please be aware that FDI is not responsible for the privacy policies of those other sites. If users provide information directly to websites other than FDI, different rules may apply for the use of personal information.

You are solely responsible for Your privacy settings, and FDI is not and will not be responsible for Personal Information shared by You via a User Profile or the settings associated therewith.

## C. Children’s Privacy

FDI does not collect any information from anyone under 18 years of age. Our website and courses are directed at people who are older than 18 years.

Please direct additional Questions or Concerns to [floridadyspagiainst2@gmail.com](mailto:floridadyspagiainst2@gmail.com).