**CYBS’ PRIVACY & COOKIE POLICY**

**General**

Create Your Brain State LLC (“CYBS”[[1]](#footnote-1)) is committed to respecting the privacy of consumers and its customers. This Privacy & Cookie Policy sets out how we collect, use, and share personal information. This Privacy & Cookie Policy also explains how we use cookies and similar technologies on our US websites.

You can access this Privacy & Cookie Policy via our homepage and from the bottom of every page by clicking on the appropriate link in the footer.

**Glossary**

“Consumer” – an individual or an individual's legal representative that visits our website.

“Customer” – a consumer that has an ongoing relationship with CYBS, whereby the consumer is a member of the Primal Trust™ Academy and Community (PTAC).

“Contractor” – a person who performs tasks as requested by CYBS, within the context of CYBS’s activities, including but not limited to the Primal Trust™ Academy and Community (“PTAC”), whether those tasks are remunerated or not.

“Nonpublic personal information” – "  All personally identifiable information.

**What information CYBS collects**

 CYBS collects the following information:

* From individuals who request informational materials, CYBS collects information including name, address, telephone number, email address and membership-related questions.
* From clients, prospective clients, contractors and prospective contractors, CYBS collects information provided orally and in writing via email, mail, online or in person.
* Our websites use cookies to collect technical information, such as IP address, browser used to view the website, operating system, resolution of screen, location, language settings in browser, the site directing to our site, keywords searched, the number of page views, etc. Please see “Cookie Policy” below.

**How CYBS uses and shares information collected**

CYBS may use the information for the following reasons:

* Internal record keeping.
* To improve products and services.
* To follow up, either by email, phone or mail, with people who have requested information and/or materials.
* To periodically send promotional email or mail about services, recent developments or other information individuals may find interesting using the email address or mailing address provided when requesting information.
* To access certain special features or areas of this website.
* To evaluate prospective employees for positions, and to employ its personnel.
* As otherwise permitted by law.

CYBS may disclose information externally as permitted or required by law (such as to affiliates, service providers, and governmental / regulatory agencies), or where individuals have provided permission. CYBS will not sell or lease personal information to third parties so they can market to individuals.

**How to contact CYBS**
If you have any questions or concerns regarding this Privacy & Cookie Policy, CYBS can be contacted by emailing admin@primaltrust.org. When contacting us, please ensure that full name and address are provided in exactly the form in which it was originally provided to CYBS to avoid any possible confusion with a different individual.

**How to unsubscribe**

To unsubscribe from CYBS marketing email communications, send an email to admin@primaltrust.org. Please put “UNSUBSCRIBE” in the subject field and include the email address where you received the content, along with any additional email addresses you would like suppressed. We will do our best, as quickly as we can, to prevent you from receiving our email content in the future.

**Security**

In order to prevent unauthorized access or disclosure, CYBS has put in place suitable physical, electronic and managerial procedures to safeguard and secure information. Nevertheless, due to the nature of the Internet and Internet technologies, security and privacy risks cannot be eliminated and CYBS cannot guarantee that information will not be disclosed in ways not otherwise described in this privacy policy.

**Other Websites**

The CYBS website may contain links to enable users to visit other websites of interest easily. However, once users have used these links to leave this site, users should note that CYBS does not have any control over that other website. Therefore, CYBS cannot be responsible for the protection and privacy of any information which users provide while visiting such sites and such sites are not governed by this Privacy & Cookie Policy. Individuals should exercise caution and look at the privacy and cookie policies applicable to the website in question.

**Cookie Policy**

A cookie is a small text file downloaded to an individual’s computer (or other device) when accessing **webpages** that use them. Cookies and other online tracking technologies (collectively referred to in this policy as “**cookies**”) allow a website to store and retrieve information about visitors’ online activity. Cookies are, for example, how a website remembers what display language you chose or what items you put into your online shopping cart.

Cookies can be categorized by who places them:

* First-party cookies: These cookies are downloaded to an individual’s computer from a server or domain managed by the publisher of the website whose service the individual is requesting.
* Third-party cookies: These cookies are downloaded to a computer from a server or domain that is not managed by the publisher, but by another entity that may be seeking data obtained through cookies.

Cookies can also be categorized by their duration:

* Session cookies: These cookies are designed to collect and store data while the individual accesses a web page. They are often used to store information for the duration of a visit to the site (e.g., what account you are logged into). Once an individual leaves the website, the session cookie is deleted.
* Persistent cookies: These cookies store data on a computer for the duration of the period set within the cookie’s file, which is determined by the entity controlling the cookie, and can range from a few minutes to several years, or until manually deleted.

Lastly, cookies can be categorized by the function they serve. CYBS uses the following types of first- and third-party cookies:

1. Functionality Cookies

These cookies allow the website to remember choices you make (such as your geographic region or preferred text size). Functionality cookies do not collect any personal information. Enabling functionality cookies may be necessary to access the full content of website material.

2. Personalization Cookies

Personalization cookies allow a website to remember information that changes the page’s appearance or behavior, such as, for example, the language selected for viewing the page.

3. Analytics Cookies

Analytics cookies analyze how individuals browse a website and enable CYBS to measure the number of visitors to its websites, as well as to measure and analyze how individuals interact with the site. We use this information to improve the websites and the products or services offered.

4. Behavioral Advertising Cookies

CYBS serves advertisements on various websites using third party companies. If an individual visits a website or clicks on one of CYBS’ advertisements, behavioral cookies will be placed on the individual’s computer. Behavioral cookies allow CYBS to manage and optimize its digital marketing (e.g., banner ads, pages offering informational brochures, email campaigns, etc.). Behavioral cookies may be used to build a profile to provide content more relevant to an individual’s interests. They adapt advertising and the content the individual sees on other websites based on browsing habits, including how the individual navigates websites, as well as how the individual interacts with internet advertising.

**“Do Not Track” Signals**
Our website does not respond to “do not track” signals from users’ web browsers.

**How to Manage Cookies**

To learn more about behavioral advertising cookies and to opt in or out of multiple advertising networks at once, you can visit the website [YourAdChoices](https://youradchoices.com/). Some advertising networks do not participate in the YourAdChoices service. To opt out of some of these networks, please visit the [consumer opt-out page](https://optout.networkadvertising.org/?c=1) of the Network Advertising Initiative.
As explained above, cookies help you to get the most out of the websites that make use of this technology. Disabling cookies may affect the functionality of many of the websites you visit. If you do disable cookies, performance and functionality will be affected. If you wish to delete, disable, or re-enable cookies, you may do so through your browser as follows:

Internet Explorer: https://support.microsoft.com/en-au/help/17442/windows-internet-explorer-delete-manage-cookies#ie=ie-11

Chrome: https://support.google.com/chrome/answer/95647?hl=en
Firefox: https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer
Safari: http://www.apple.com/au/support/mac-apps/safari/

All other browsers: Please look for a ‘help’ function in the browser or contact the browser provider.

**Changes to Privacy Policy**

From time to time, CYBS may use data for new uses not previously disclosed in its Privacy & Cookie Policy. If its information practices change at some time in the future, CYBS will post the policy changes to <https://www.primaltrust.org/privacypolicy> to notify users of these changes and provide the ability to opt out or unsubscribe from these new uses. For the most up-to-date information on how CYBS uses personal information, please visit the privacy policy on our website.

**California Residents Only**

Beginning January 1, 2020, California residents have certain rights relating to their personal information described in the chart below. A California resident with questions about our privacy policies should contact us by email at admin@primaltrust.org. A California resident with a disability seeking privacy information in an alternative format should contact us in the same manner. For other contact information, refer to “How to contact CYBS” above.

Information Collected and How it is Used

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| **Categories of Personal Information**  | **Purposes of Collecting and Using Personal Information**  |
| Name, address, telephone number, email address, and other identifying information relating to individuals  | Marketing purposes, including delivering informational materials to individuals who request them and offering financial services  |
| Commercial information limited to records of informational materials requested and other individual interactions with us  | Marketing purposes, including tracking responses from prospective clients and research to improve offerings  |
| IP addresses and other technical information as described in “Cookie Policy” above  | Marketing purposes, including direct marketing optimization and insight on performance of web based applications  |
| Employment-related information  | Promote employment opportunities; evaluate competence and qualifications; perform background checks; and administer employment relationship, including payroll, benefits, travel arrangements, expense reimbursement, career development, employee recognition, and promotion of CYBS in internal and external materials and advertising  |
| Other information obtained in the course of providing advice and other services  | Provide services; enhance client service capabilities; and meet CYBS’ regulatory obligations  |

CYBS obtains information used for marketing purposes directly from individuals who request informational materials, through cookies and other online tracking technologies, from existing clients and other referral sources, and from list vendors that gather and sell identifying information. Employment-related information is obtained from third party recruiters, employee referrals, directly from individuals, and background check providers. Other information is obtained directly from individuals. CYBS only discloses personal information as required by law to regulatory agencies, law enforcement authorities, its lawyers and accountants, and other third parties explicitly authorized by the individual. CYBS does not sell or lease personal information to third parties.

**Accessing and Deleting Your Personal Information**

California residents have the right to request disclosure of the categories of personal information collected, specific pieces of personal information collected, sources, purposes for collecting and using, and categories of third parties whom the information is shared. California residents also have the right to request deletion of their personal information and to not be discriminated against for exercising their rights with respect to personal information.

To exercise these rights, California residents or their authorized agents should email admin@primaltrust.org . Requests must include sufficient information to verify the requester’s identity, including name, email, phone, and zip code. Deletion requests will require additional confirmation. For requests submitted by agents, proof of authority, such as a copy of a valid power of attorney, will generally be required. CYBS will confirm receipt of a request within 10 days and respond within 45 days.

1. Please note that CYBS may also be referred to as “we” or “us” , “our” in this document, as grammatically appropriate. [↑](#footnote-ref-1)