***The Gateway Institute LLC*** respects the sensitive nature of any personal information you provide to us.  We have created this Privacy Policy to demonstrate our commitment to the privacy of those who visit our website [**https://www.gatewayocd.com**](https://www.gatewayocd.com)(the “Site”).  This Privacy Policy describes our online information collection, storage and disclosure practices and the choices you have regarding how your personal information is collected and used by us and our e-commerce providers.  By accessing and using the Site, you consent to the collection, use and disclosure of information through the Site as described in this Privacy Policy.

Residents of the European Economic Area (“EEA”), which includes the member states of the European Union (“EU”), should consult the sections of this policy relating to the “Rights of EEA Residents” and “International Data Transfers” for provisions that may apply to them.

We reserve the right to change this Privacy Policy at any time. In the event we make changes to this Privacy Policy, such policy will be re-posted in the “Privacy” section of our Site with the date such modifications were made indicated on the top of the page or we may contact you to inform you about the revisions with a link to the revised Privacy Policy. All changes are effective on the date listed at the top of this page and will apply to all information that we have about you. Your continued use of the Site or the services that we provide (“Services”) after any change is posted indicates your acceptance of the changes and your continued consent to our processing of your personal data. If at any point you do not agree to any portion of the Privacy Policy then in effect you should immediately stop using the Site and the Services. Because this Privacy Policy contains legal obligations, we encourage you to review this Privacy Policy carefully. If you have any questions concerning this Privacy Policy or our information collection, storage and disclosure practices, please contact us at [**info@gatewayocd.com**](mailto:info@gatewayocd.com)

Personal Data That We Collect and How We Use It

***The Gateway Institute LLC*** collects personal data about you when you visit the Site.  “Personal Data” is information that may be used to directly or indirectly identify you, including your name, e-mail address, phone number or other information about you.  The majority of such Personal Data is collected when you sign up for our newsletter, participate in our blog or otherwise provide us with your contact information.

In general, the type of Personal Data we collect includes, but is not limited to:

* Personal Data to contact you to promote our Services or alert you to special offers, features or matters of interest;
* Un-identifiable and aggregated Personal Data pertaining to your Site visits that help us maintain the appropriate features, functionality and user experience

We and our e-commerce providers use that data to: (i) provide you with information; (ii) allow you to make blog postings; (iii) guard against potential fraud; (iv) provide answers to your inquiries or questions; and (v) maintain regular communication with you as may be necessary to inform you of offers, updates and other information regarding ***The Gateway Institute LLC*** and its Services.

Social Networks

If you choose to connect to our Sites through a third-party social network such as Facebook, Twitter, Instagram, LinkedIn, Pinterest and other networks (each, a “Social Network”), we may collect Personal Data from your profile on such Social Network, such as your name, user name, and e-mail address. In addition, our Sites offer features that will allow you to share information from our Sites to a Social Network or share information from our Social Network sites. If you decide to use such features, they may allow the sharing and collection of information both to and from such Social Network so you should check the privacy policy of each Social Network before using such features.

Non-Identifiable Data and Aggregated Personal Data

Regardless of whether you submit information to us, ***The Gateway Institute LLC*** and third parties performing e-commerce services for us may send one or more “cookies” to your computer.  Cookies are small text files placed on your web browser when you visit our Site that store information on your computer, such as your Site preferences.  We use cookies when you sign in to keep track of your personal session.  We also use cookies to track your activity on the Site as a unique person.  For security purposes, all of this information is stored in encrypted form.  This data may be used to display information about our Services and Products on websites operated by third parties.

You can set your web browser to inform you when cookies are set, or to prevent cookies from being set altogether.  Please note, however, that if you decline to use cookies, you may experience reduced functionality and slower site response times.

***The Gateway Institute LLC*** or our service providers, including Google Analytics, may also collect web surfing data related to your use of the Site.  Such information may include: your Internet Protocol (IP) address, browser type, and internet service provider (ISP); your operating system; which of our web pages you access and how frequently you access them; referral or exit pages; click stream data; and the dates and times that you visit the Site.  This data may be collected using cookies, web beacons, page tags or similar tools.  As with cookies, the web surfing information is anonymous, “click stream” transactional data that is not associated with any users as individuals.

Web surfing data and similar information may be aggregated for administrative purposes. ***The Gateway Institute LLC*** may, for example, use this aggregated information in the administration of the Site to improve its usability and to evaluate the success of particular marketing and advertising campaigns, search engine optimization strategies, and other marketing activities.  We also use it to help optimize the Site based on the needs of our users.

How and When Your Information Is Shared With Other Parties

***The Gateway Institute LLC***  does not sell, trade or license Personal Data about its users for marketing purposes. We do, however, work with a number of trusted partners who perform vital functions as part of our operations. We do not share your Personal Data unless it is necessary to fulfill our responsibilities, including providing information or Services to you.

Additional Sharing of Information

We may engage third parties to help us carry out certain other internal functions or other data collection relevant to our business.  Personal Data is shared with these third parties only to the extent necessary for us to process the transactions you initiate or perform other specific services.  Our partners are legally required to keep your Personal Data private and secure.

We may share your Personal Data with law enforcement or other government agencies as required by law or for the purposes of limiting fraud. We reserve the right to disclose your Personal Data when we believe that disclosure is necessary to protect our rights or to comply with a judicial proceeding, court order or legal process. We further reserve the right to disclose any of your Personal Data that we believe, in good faith, appropriate or necessary to take precautions against liability, to investigate and defend against any third-party claims or allegations, to assist government enforcement agencies, to protect the security or integrity of the Site or our services, or to protect the rights, property or personal safety of ***The Gateway Institute LLC***, its users, issuers, or others.

We will not share your Personal Data if such sharing is prohibited by applicable privacy and data protection law, including, without limitation, the EEA’s General Data Protection Regulation effective May 25, 2018.

EEA Residents

This section of the Privacy Policy is applicable to residents of the European Economic Area (“EEA”).  The EEA consists of the member states of the European Union, i.e., Austria, Belgium, Bulgaria, Croatia, Republic of Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden and the United Kingdom, and Iceland, Liechtenstein, and Norway.  This section also applies to residents of Switzerland and, in the event of its departure from the EU, residents of the United Kingdom.   Residents of the EEA and Switzerland are referred to here as “EEA Residents.”

From May 25, 2018, all processing of Personal Data of EEA Residents is performed by ***The Gateway Institute LLC*** in accordance with the General Data Protection Regulation (2016/679) of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons regarding the processing of Personal Data and on the free movement of such data (“GDPR”).

Under the GDPR, ***The Gateway Institute LLC*** is both the controller and a co-processor of the Personal Data of EEA Residents. The purpose for collecting and processing Personal Data from EEA Residents is to authenticate subscription to our mailing lists and to provide information about our Services. The legal basis for collecting Personal Data for subscribing to our e-mail lists is your consent.  You may withdraw consent for obtaining such communications by following the “Unsubscribe” instructions on any communication or by contacting us at [**info@gatewayocd.com**](mailto:info@gatewayocd.com).

EEA Residents may obtain information about the Personal Data that ***The Gateway Institute LLC*** holds about them by contacting us at [**info@gatewayocd.com**](mailto:info@gatewayocd.com).

International Data Transfers

If you are resident outside the United States, including in the EEA, we transfer Personal Data provided by you for processing in the United States.  Under the GDPR, ***The Gateway Institute LLC*** is considered a “controller” and a “co-processor” of the Personal Data of EEA Residents.  By providing Personal Data to ***The Gateway Institute LLC*** for the purpose of obtaining Services, you consent to the processing of such data in the United States.

Please note that the United States does not have data protection laws equivalent to those in the EEA and other jurisdictions.

Notifications and Communications from Our Site

**Communications Regarding Our Services**

We will send you email notifications and free newsletters from time to time with offers, suggestions and other information.  Some notifications are communications relating to us and our Services.  You may “opt-out” from receiving such communications by following the “Unsubscribe” instructions provided in the e-mail.

**Legal or Security Communications**

We also send out notices that are required for legal or security purposes.  For example, certain notifications are sent for your own protection.  In other cases, these notifications involve changes to various legal agreements, such as the Privacy Policy or Terms of Service.  Generally, you may not opt out of such emails.

**Account and Order Communications**

If you purchase Products, we may send you communications regarding such purchases.  We may also send communications providing customer support or responses to questions regarding the operation of the Services.  Generally, you may not opt out of such emails.

**Deleting Your Information**

If you want us to delete your Personal Data and your account, please contact us at [**info@gatewayocd.com**](mailto:info@gatewayocd.com) with your request.  We will take steps to delete your information as soon as we can, but some information may remain in archived/backup copies for our records or as otherwise required by law.

Personal Data Retention

We retain the Personal Data we receive as described in this Privacy Policy for as long as you use our Services or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

Links to Other Sites

If you follow any links that direct you away from the Site, including links to social media sites or to other websites, among others, this Privacy Policy will not apply to your activity on the other Sites you visit. We do not control the privacy policies or the privacy practices of any third parties.

Privacy in Submitted Materials

If you submit any information to us, including through our blog, such information may be displayed on the Site, including the comments that you provide. By submitting such information you forego any privacy rights in such materials. Please consult the Terms of Service for other conditions relating to submission of materials to ***The Gateway Institute LLC***.

Security Policy

We take commercially reasonable steps to protect our customers’ Personal Data against unauthorized disclosure or loss.  However, no data transmission over the Internet can be guaranteed to be 100% secure.  Therefore, while we strive to protect user information we cannot ensure or warrant the security of any information you transmit to us or from the Site.  You engage in such transmissions at your risk.

If you believe your Personal Data is being improperly used by us or any third party, please immediately notify us via email at [**info@gatewayocd.com**](mailto:info@gatewayocd.com).

Children Under 13

This Site is restricted to the use of adults over the age of majority in their place of residence. No portion of the Site is directed to children under the age of 13. Consequently, we do not knowingly collect personal identifying information from any person we know is a child under the age of 13. If we learn that we have collected personal information from a child under age 13 we will delete that information as quickly as possible. If you are a parent or guardian of a child under 13 years of age and you believe your child has provided us with Personal Information, please contact us at [**info@gatewayocd.com**](mailto:info@gatewayocd.com).

Do Not Track

Although some browsers currently offer a “do not track (‘DNT’) option,” no common industry standard for DNT exists. We therefore do not currently commit to responding to browsers’ DNT signals.

Your California Privacy Rights

Under certain circumstances, California Civil Code Section 1798.83 states that, upon receipt of a request by a California customer, a business may be required to provide information regarding how that business has shared personal information of customers with third parties for direct marketing purposes. However, the foregoing does not apply to businesses like ours that do not disclose personal information to third parties for direct marketing purposes.

Your Rights and Obligations

We ask that you keep the Personal Data that you provide to us current and that you correct any information you have provided us by contacting us at [**info@domainname.com**](mailto:info@domainname.com)*.*You represent and warrant that all Personal Data you provide us is true and correct and relates to you and not to any other person.

If you are a resident of the EEA and wish to access or correct the Personal Data that ***The Gateway Institute LLC*** has about you or have any questions relating to the processing of your Personal Data, please contact us at [**info@gatewayocd.com**](mailto:info@domainame.com) with the subject line “GDPR Data.”

If you use the Site, you are responsible for maintaining the confidentiality of your account and for restricting access to your computer or device, and you agree to accept responsibility for all activities that occur under your account.