



TRACE Privacy Policy

1. ABOUT THIS POLICY

This policy describes the types of personal information that TRACE International, Inc. (“TRACE” or “we” or “our”) may collect in our role as a data controller, the purposes for which we may use the information, the circumstances in which we may share the information and the steps we take to safeguard this information. We may also process other data in our role as a data processor on behalf of other data controllers in strict accordance with their instructions, which may differ from what is described in this Policy.

2. THE INFORMATION WE COLLECT

TRACE maintains various applications in connection with our services including our website (which includes the TRACE e-Gov Portal), resource center library, learning management system (LMS), TRACegifts platform, and HubSpot, our customer relationship management platform, each of which may collect different kinds of personal information. Depending upon the service, product and application, the following personal information may be collected:

- Login credentials, IP addresses, website cookies, internal unique identifiers and other session details when our online applications are used;
- Basic contact information such as name, business address, email address and telephone number;
- Contract signatory information on agreements for services such as name, title, signature and company name;
- Company affiliation, department, title, and
- Online training and test information such as date assigned, date started, training score, completion date, training language, and type of course taken.

This is a broad description of the types of personal information that our company processes as a controller. To understand how your own personal information is processed in each particular instance, you may need to refer to any personal communications you may have received from us, check any privacy notices we may have provided to you or made available on our site, or contact us to ask about your personal circumstances.

3. WHAT WE DO WITH COLLECTED INFORMATION

As with the types of information collected, the purposes for which TRACE processes personal information vary depending on the service, product or application. Such purposes may include:

- Providing customers with access to our services and information (e.g. creating user accounts and logins or sending materials requested via forms);
- Creating profiles to help us manage our relationship with site visitors and ensure that our customers receive and maintain updated information;
- Improving our products and services;
- Periodically sending promotional emails about products, special offers or other information we think you may find interesting using the email address you have provided (if you opted in to receive such communications).

TRACE does not sell personal information.

4. DATA SECURITY

Data security is our priority, and we are committed to safeguarding your information. We do this by:

- Establishing policies and procedures for securely managing information;
- Using access controls to limit personnel access to sensitive information;
- Protecting against unauthorized access to customer data by using physical security, firewalls, data encryption, authentication and virus detection technology, as required;
- Providing data protection training to our employees; and
- Continually assessing and improving our data protection, information management and data security practices as well as technical and organizational measures and safeguards.

5. USE OF COOKIES AND WEB BEACONS

We use “cookies” (small text files that may be placed on your web browser when you visit our website). The information derived from cookies is used for administrative purposes and to improve your experience with our website. For example, this information may help authenticate you (verify that you are who you say you are), an essential component of our website security. It also helps you more easily navigate our website by remembering your identity so that you do not have to input your password several times as you move between pages. You can prevent cookies from being set. However, if you decline to use cookies, you may experience reduced functionality and, when we require authentication, declining cookies may prevent you from using the website altogether. Please note that essential/necessary cookies, those that must be present for the website to provide the basic functionality and security of the website, will still apply, even if you decline.

We may also use web beacons (a small graphic image placed on a webpage or in an email message to monitor user activity, such as whether the webpage or email is accessed or clicked). We use this data for administrative purposes; to assess the usage and performance of our services; to improve user experience; and as otherwise permitted by applicable law or regulation.

In addition, cookies and web beacons may be used to track information and identify categories of visitors by items such as IP address, domain, browser type and pages visited to improve our service. We may use the Google Analytics™ web analytics tool to assist us in analyzing how visitors engage with our website and arrive at the public portion of the website. Further information about Google Analytics can be found at the Google Analytics Privacy Policy.

We also use a HubSpot, Inc. marketing automation tool that helps us analyze the impact of our web presence and our customers' use of the various services, for market research purposes. HubSpot's documentation provides further information about the use of cookies and web beacons by this tool.

6. RETENTION PERIODS

We keep your personal data no longer than is necessary for the purposes for which personal data is processed, or as required by applicable law / regulation. Specific retention periods for various types of data and purposes of processing are governed by our internal Data Retention Policy, but is limited in most instances to three years*. For specific details about retention periods or if you have questions about our retention of your data, please contact TRACE's Data Protection Officer as explained below.

** Certain TRACE courses may be eligible for Continuing Legal Education (CLE) or Licensed Customs Broker (CBP) continuing education (CE) credits. For such courses, TRACE will maintain enrollment data for the period required by the applicable accreditation agency (e.g. six years for CBP CE courses).*

7. DISCLOSURE OF INFORMATION TO THIRD PARTIES

We will not share your personal information with third parties, except as described herein, in separate data notices that you may receive from us or as authorized by you. TRACE may share your personal and other information or portions thereof, with a limited number of service providers and processing companies that perform services for TRACE, including: service providers that provide professional, legal, or accounting advice to TRACE; translation professionals; firms that provide data hosting, software development and database management services; law firms that are engaged to conduct audits of the personal information you have provided; and consultants that are engaged to provide customer support services, based on your location. These third parties are required to maintain the confidentiality of your personal information, and to use your personal information only in the course of providing such services to TRACE, and only for the purposes that TRACE dictates. In connection with our online training, we will share information submitted by or about students with their company and their company's administrators. Under limited circumstances, your personal information may be disclosed to third parties to comply with applicable laws and regulations, such as in response to a subpoena or similar legal process, or to lawful requests by public authorities, including to meet national security or law enforcement requirements. Any other disclosure of your personal information will be pursuant to your express consent.

If you have questions or concerns over your personal information's disclosure to a third party as described above or wish to opt out from such disclosure, please contact the TRACE Data Protection Officer as explained below.

8. HOW YOU MAY ACCESS AND CORRECT INFORMATION

You have an ongoing opportunity and responsibility to correct verified inaccuracies in your data, either through the relevant online system or by contacting us directly. If a data subject alerts us to a potential error in their information, we will promptly investigate the issue, confirm (as appropriate) that any newly-submitted information meets our due diligence and verification standards, and update the information as necessary. You may request deletion of your personal information at any time by contacting us directly, and we will respond to your request without undue delay, typically within 30 days or less. In some circumstances, you may have other rights with regards to your information such as the right to data portability and the right to object to our processing of your data.

9. THIRD-COUNTRY TRANSFER OF EU/EEA AND UK PERSONAL DATA

Any transfers of your personal data between countries will be done strictly in compliance with applicable law. Any transfer of personal data from the European Union and the European Economic Area (EU/EEA) or the United Kingdom (UK) to the United States is based either on specific consent of data subjects or the standard contractual clauses executed by TRACE with relevant entities located in the EU, EEA or UK, as the case may be.

10. CHANGES TO OUR PRIVACY POLICY

This policy provides a general statement of the ways in which TRACE protects your personal information. We may supplement this statement by sending you a specific data notice or we may update this Privacy Policy at any time, with or without advance notice. In the event there are significant changes in the way we treat your personally identifiable information, we will update this policy and may send you a personal communication summarizing the revisions.

11. CONTACT

If you have questions or concerns about our processing of personal information, please contact the TRACE Data Protection Officer at the following address:

TRACE International, Inc.

Attention: Data Protection Officer
151 West Street, Suite 300

Annapolis, MD 21401
United States of America
DPO@TRACEinternational.org

FOR EU RESIDENTS:

In addition to contacting TRACE's Data Protection Officer, individuals residing in the European Union may contact EURepresentative@TRACEinternational.org.

If contacted, we may seek additional information from you to make sure that the personal data we may possess belongs to you. Once verified, we will evaluate your request and provide you with a

response without undue delay. If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you may file a complaint with the Data Protection Commissioner at info@dataprotection.ie or the supervisory authority located in your jurisdiction.

Last Updated: 08 June 2026