

Effective Date: March 1, 2026

Data Controller: DARJAN Development, LLC - ASCENDIA

2.0. PRIVACY POLICY

Your privacy is of importance to us. This Privacy Policy explains how DARJAN-ASCENDIA ("we"), operated by DARJAN Development, LLC collects, uses, discloses, and protects information that we obtain through this Website. We are committed to protect your personal information in compliance with applicable privacy laws.

This Website is an INFORMATIONAL AND ADVISORY platform only. We collect minimal data, do not process payments, do not maintain user accounts, and do not sell or rent your personal information to any third party under any circumstances.

2.1 Information We Collect

We collect information only when you voluntarily provide it to us. Categories of information we may collect include:

A. Information You Provide Directly:

- Contact inquiries: Name, email address, phone number, professional title, company name, and the substance of your message when you complete a contact form
- Newsletter subscription: Email address and name if you opt in to receive communications
- Professional networking: Information you share through LinkedIn or other professional platforms when you connect with us
- Event registration: Contact details provided when registering for webinars, workshops, or speaking events

B. Information Collected Automatically:

- Device and browser information (browser type, operating system, device type)
- IP address and approximate geographic location derived from IP address
- Pages visited, time spent on pages, and navigation patterns
- Referring website addresses
- Session information, including date and time of visit

We do NOT collect: social security numbers, financial account information, health or medical information, government-issued identification numbers, or sensitive personal information beyond what is described above.

2.2 Legal Basis for Processing (GDPR)

For visitors from the European Economic Area (EEA) or United Kingdom, our legal bases for processing personal data are:

- Consent: Where you have expressly given consent (e.g., newsletter subscription, cookie acceptance)
- Legitimate Interests: Analytics and website improvement activities that do not override your rights
- Contractual Necessity: Processing required to respond to your service inquiries and facilitate potential engagements
- Legal Obligation: Compliance with applicable laws and regulations

2.3 How We Use Your Information

We use collected information solely for the following purposes:

- Responding to inquiries, requests, and communications submitted through the Website
- Providing information about our coaching, advisory, and consulting services
- Sending requested marketing communications (only with your explicit consent)
- Improving the functionality and content of the Website
- Analyzing Website usage to better understand visitor needs and interests
- Complying with applicable legal obligations
- Protecting the security and integrity of the Website
- Administering events, webinars, and workshops to register

We will NOT use your information for automated decision-making or profiling that produces legal or similarly significant effects.

2.4 Information Sharing and Disclosure

WE DO NOT SELL, RENT, TRADE, OR TRANSFER YOUR PERSONAL INFORMATION TO THIRD PARTIES. We may disclose your information only in the following strictly limited circumstances:

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- Service Providers: Trusted third-party vendors who assist in operating the Website (hosting, email delivery, analytics), bound by confidentiality agreements and prohibited from using your data for their own purposes
 - Legal Compliance: When required by applicable law, regulation, court order, or lawful governmental request
 - Protection of Rights: When necessary to protect the rights, property, or safety of DARJAN, ASCENDIA, Website users, or the public
 - Business Succession: In connection with a merger, acquisition, or sale of substantially all business assets, with advance notice provided to affected individuals

In all cases of permissible disclosure, we will share only minimum information necessary.

2.5 Data Retention

We retain personal information only for as long as necessary to fulfill the purposes for which it was collected and as required by applicable law. Specific retention periods:

- Contact form submissions: 24 months from date of submission, unless a client relationship develops
- Client communications and engagement records: Duration of relationship plus 10 years for legal compliance
- Newsletter subscriptions: Until unsubscribed plus 12 months
- Website analytics data: 26 months from collection date

Upon expiration of retention periods, personal data is securely deleted or anonymized.

2.6 Your Privacy Rights

Depending on your jurisdiction, you may have the following rights regarding your personal information:

- Access: Request a copy of personal information we hold about you
- Rectification: Request correction of inaccurate or incomplete information
- Erasure ("Right to be Forgotten"): Request deletion of your personal information
- Restriction: Request that we limit processing of your personal information
- Data Portability: Request your data in a structured, machine-readable format
- Object: Object to processing based on legitimate interests or for direct marketing
- Withdraw Consent: Withdraw consent at any time without affecting prior processing
- Non-Discrimination: Exercise privacy rights without discrimination (California residents)

To exercise any of these rights, please contact us using the information in Section 4. We will respond within sixty (60) days. We may require verification of your identity before fulfilling requests.

2.7 California Privacy Rights (CCPA)

California residents have specific rights under the California Consumer Privacy Act (CCPA). In the preceding 12 months, we have not sold personal information of California residents. California residents may:

- Know what personal information is collected, used, shared, or sold
- Delete personal information we have collected about them
- Opt out of the sale of personal information (we do not sell personal information)
- Receive equal service and price, even if they exercise their privacy rights

To submit a verifiable consumer request, contact us at the information provided in Section 4.

2.8 Data Security

We implement appropriate technical and organizational security measures to protect your personal information against unauthorized access, alteration, disclosure, or destruction. Security measures include:

- SSL/TLS encryption for data transmitted through the Website
- Access controls limiting personnel who may access personal information
- Regular review and updating of security practices
- Secure third-party hosting with industry-standard security certifications

HOWEVER, NO METHOD OF TRANSMISSION OVER THE INTERNET OR ELECTRONIC STORAGE IS 100% SECURE. We do not guarantee absolute security. You transmit information to us at your own risk. If you believe your information has been compromised, please notify us immediately.

2.9 Children's Privacy

This Website is not directed to, and we do not knowingly collect personal information from, individuals under the age of 18 ("children"). Our services are intended exclusively for professionals and business executives. If we become aware that we have inadvertently collected personal information from a child, we will take immediate steps to delete such information. Parents or guardians who believe their child has provided information to us should contact us immediately.

2.10 International Data Transfers

The Website is operated from the United States. If you are visiting from outside the United States, please be aware that your information may be transferred to and processed in the United States, where data protection laws may differ from those in your jurisdiction. By using this Website, you consent to the transfer of your information to the United States.

2.11 Third-Party Services and Links

The Website may integrate with or link to third-party services (e.g., LinkedIn, Academia etc. platforms). This Privacy Policy does not apply to those third-party services. We encourage you to review the privacy policies of any third-party services you access through the Website.

2.12 Changes to This Privacy Policy

We reserve the right to update this Privacy Policy at any time. We will notify you of material changes by posting the updated policy on this page with a revised effective date. Your continued use of the Website after any changes constitutes your acceptance of the revised Privacy Policy. We encourage you to review this policy periodically.

ACKNOWLEDGMENT OF LEGAL POLICIES

By accessing and using the ASCENDIA Website, you acknowledge that you have read, understood, and agree to be bound by all four components of this Legal Policies: the Terms & Conditions, Privacy Policy, Cookie Policy, Disclaimers, and Contact. These policies collectively constitute the complete legal framework governing your use of the Website.

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Maryland, United States | March 1, 2026