

# The Leadership Circle Web Applications Privacy Notice

Effective: February 19, 2018

## Introduction

We at The Leadership Circle, LLC (“The Leadership Circle”, “we”, “us”, and “our”) know that your privacy is important. This Privacy Notice (the “Notice”) is designed to assist you in understanding how we will process your Personal Data in the following web application (the “web app”):

- [project-center.theleadershipcircle.com](http://project-center.theleadershipcircle.com)

Please read this Notice to learn more about the ways in which we collect and use your Personal Data. If we make any material changes to this Notice, we will notify you in accordance with the process described in the Changes to This Notice section below. By using our web app, you consent to our processing of your Personal Data as described in this Notice, including the transfer of your data to the United States and the Philippines.

## Data Controllorship

In the context of this Notice, The Leadership Circle acts as a data controller for the Personal Data we process.

## Basis of Processing

Within the scope of this Notice, we may rely on one or more of the following legal grounds for processing of your Personal Data:

- the need to perform our obligations under a contract or to perform related pre-contractual duties;
- the legitimate interest of the “Participant” (i.e., the individual who is being evaluated), such as to demonstrate leadership abilities; and
- any other ground, as required or permitted by law in the specific respective context.

## Categories of Personal Data

Personal Data collected by us could include:

- contact information, such as first and last name,
- e-mail address,
- and mailing address;
- demographic data, such as date of birth, gender, and country of residence;
- professional and educational data, such as job title/position, organizational level, and education;
- your relationship to other parties using our web app;
- information that describes an individual’s leadership style, such as leadership qualities;
- evaluation survey input;
- IP address; and
- any other data we collect about you that by itself may not be Personal Data but if combined with Personal Data could be used to personally identify you.

## How We Receive Personal Data

We may receive your Personal Data through our web app. We may also receive your personal data from third parties, in which case we will notify you, where required by applicable laws, without undue delay. In particular, we may receive your Personal Data in our web app when you or third parties:

- create an evaluation in the web app;
- invite an evaluator via our web app; or
- complete an evaluation survey.

## Purposes of Processing

We may process your Personal Data for the purposes of:

- enabling the use of the web app;
- evaluating leadership qualities and providing feedback to the parties concerned;
- and sending you email notifications which you have specifically requested.

## Data Retention

Data processed in the web app is retained indefinitely. However, we will always respect your request(s) that we delete your Personal Data, subject to the limitations described in this Notice.

## Sharing Personal Data with Third Parties

We may use third party vendors to perform certain services on our behalf, such as web hosting providers.

We may share your Personal Data with these third-party vendors solely to enable them to perform the services for us. In providing such Personal Data, we require that those third-party vendors maintain at least the same level of security that we maintain for such Personal Data.

## Other Disclosure of Your Personal Data

We may disclose your Personal Data:

- to the extent required by law or if we have a good-faith belief that such disclosure is necessary in order to comply with official investigations or legal proceedings initiated by governmental and/or law enforcement officials, or private parties, including but not limited to: in response to subpoenas, search warrants, or court orders;
- if we sell or transfer all or a portion of our company's business interests, assets, or both, or in connection with a corporate merger, consolidation, restructuring, or other company change; and
- to our subsidiaries or affiliates only if necessary for business and operational purposes.

We reserve the right to use, transfer, sell, and share aggregated, anonymous data, which does not include any Personal Data, about our web app users as a group for any legal business purpose, such as analyzing usage trends and seeking compatible advertisers, sponsors, clients, and customers.

If we must disclose your Personal Data in order to comply with official investigations or legal proceedings initiated by governmental and/or law enforcement officials, we may not be able to ensure that such recipients of your Personal Data will maintain the privacy or security of your Personal Data.

## Use of Cookies

We use cookies to store information on your computer. Cookies improve your navigation on this site and enhance your user experience. You may delete or otherwise control cookies. For more information please visit <https://www.aboutcookies.org/>.

## Data Integrity and Security

We have implemented and will maintain technical, organizational, and physical security measures that are reasonably designed to help protect your Personal Data from unauthorized processing, such as unauthorized access, disclosure, alteration, or destruction.

If you use our web app, you are responsible for protecting the security of your user name and password. You are responsible for any transaction made using your user name and password.

## Access, Review & Opting Out

If you are a data subject about whom we store Personal Data, you may have the right to request access to, and the opportunity to update, correct, or delete, such Personal Data. If you have direct access to our web app, you may do this by logging into our web app and making changes in the My Account section, where applicable. Alternatively, you may always e-mail us at the e-mail address found in the Contact Us section of this Notice. We will implement your requested changes as soon as we reasonably can.

## Privacy of Children

Our web app is not directed at, or intended for use by, children under the age of 13. We do not knowingly allow anyone under 18 to provide any Personal Data on our web app. Children should always get permission from a parent or guardian before sending personal information over the Internet. If you believe your child may have provided us with Personal Data, you can contact our Privacy Officer using the information in the Contact Us section of this Notice and we will delete the Personal Data.

## EU-U.S. and Swiss-U.S. Privacy Shield Frameworks

With respect to Personal Data processed in the scope of this Notice, The Leadership Circle, LLC complies with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework (the "Privacy Shield"), as adopted and set forth by the U.S. Department of Commerce, regarding the processing of Personal Data. The Leadership Circle, LLC commits to adhere to and has certified to the Department of Commerce that it adheres to the Privacy Shield Principles.

To learn more about the Privacy Shield, and to view The Leadership Circle, LLC's certification, please visit <https://www.privacyshield.gov> and <https://www.privacyshield.gov/list>, respectively.

## Personal Information Protection Act of Japan

With respect to Personal Data processed in the scope of this Notice, The Leadership Circle, LLC complies with the Personal Information Protection Act of Japan.

## Accountability for Onward Transfers

The Leadership Circle remains liable for the protection of Personal Data that we transfer to our service providers within the scope of our Privacy Shield certification, except to the extent that we are not responsible for the event giving rise to any unauthorized or improper processing.

## VeraSafe Privacy Program

The Leadership Circle is a member of the [VeraSafe Privacy Program](#), meaning that with respect to Personal Data processed in the scope of this Notice, VeraSafe has assessed The Leadership Circle's data governance and data security for compliance with the [VeraSafe Privacy Program Certification Criteria](#). The certification criteria require that participants maintain a high standard for data privacy and implement specific best practices pertaining to notice, onward transfer, choice, access, data security, data quality, recourse, and enforcement.

## Dispute Resolution

If a privacy complaint or dispute cannot be resolved through The Leadership Circle's internal process, The Leadership Circle has agreed to participate in the [VeraSafe Privacy Shield Dispute Resolution Procedure](#). Subject to the terms of the VeraSafe Privacy Shield Dispute Resolution Procedure, VeraSafe will provide appropriate recourse free of charge to you. To file a complaint with VeraSafe and

participate in the VeraSafe Privacy Shield Dispute Resolution Procedure, please submit the required information here: <https://www.verasafe.com/privacy-services/dispute-resolution/submit-dispute/>

## Binding Arbitration

If your dispute or complaint can't be resolved by us, nor through the dispute resolution program established by VeraSafe, you may have the right to require that we enter into binding arbitration with you pursuant to the Privacy Shield's Recourse, Enforcement and Liability Principle and Annex I of the Privacy Shield.

## Regulatory Oversight

The Leadership Circle, LLC is subject to the investigatory and enforcement powers of the United States Federal Trade Commission.

## Changes to This Notice

We may update this Notice from time to time by posting a new version on this web page. You should visit this page occasionally to ensure you agree with any changes. We will post our revised Notice on this web page and update the "Effective" date above to reflect the date of the changes. By continuing to use our web app after we post any such changes, you agree that you accept the Notice as modified.

## Contact Us

If you have a complaint, dispute, or questions regarding this Notice or our treatment of your Personal Data, please write to our privacy officer by email at [privacy@fcg-global.com](mailto:privacy@fcg-global.com)

or by postal mail at:

Attn: Privacy Officer, The Leadership Circle, LLC  
Nathan Delahunty  
426 Universal Circle, Sandy, UT, 84070  
USA

Please allow up to 10 days for us to reply.

[Privacy verification powered by VeraSafe.](#)