

# LEADERSHIP CIRCLE GENERAL PRIVACY NOTICE

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## GENERAL INFORMATION

This Privacy Notice (“Privacy Notice” or “Notice”) describes how Leadership Circle Holdings, LLC, Conscious Leadership, LLC, Full Circle Group North America, LLC, The Leadership Circle, LLC, Evolving Conscious Leadership, Ltd Pty, Full Circle Group Asia Pacific, Pty Ltd, The Leadership Circle Asia Pacific, Pty Ltd, Leadership Circle Shanghai Consultancy Co. Ltd, Evolving Conscious Leadership, B.V., and The Leadership Circle SL and its affiliates (“**Leadership Circle**,” “**we**,” “**our**,” and/or “**us**”) collect, use, and disclose your personal data. We value the privacy of individuals who use our websites, app, coaching, and related services (collectively, our “**Services**”). This Privacy Notice explains how we collect, use, and share the information of users of our Services (“**Users**” or “**you**”).

This notice may periodically refer to some aspects of our data processing activities that only apply to certain categories of Users. Our Users can be broken down in the following groups:

- **Practitioners/coaches** are contractors who work with the Leadership Circle to assess and train leaders.
- **Leaders** are the individuals receiving The Leadership Circle’s assessment, training, and related services.
- **Evaluators** are individuals who know a Leader and voluntarily assess that Leader’s qualities and abilities; they may or may not also be Leaders.
- **Business Clients** are organizations that have retained The Leadership Circle to provide an assessment, training, or other services for a Leader/Leaders and are typically employers of Leader(s).
- **Others** are those who may visit our website or whose data we have gathered or processed in some way without having formed one of the above relationships with them. Others typically consist of those who visit our websites or social media pages and may subscribe for mailers or other services without becoming Business Clients, Practitioners/coaches, or Leaders.

By using our Services, you agree to the collection, use, disclosure, and processing of your information as described by this Privacy Notice. Beyond the Privacy Notice, your use of our Services is also subject to our [Terms of Service for Leaders](#) and any additional agreements you may enter into with us.

Some jurisdictions have special privacy laws and require additional information about our practices. If you are in California, Colorado, Connecticut, Utah, or Virginia, you can review our Leadership Circle Detailed Privacy Notice by clicking [here](#) or scrolling down to see our full disclosures as required by those jurisdictions. If you are in the United Kingdom or the EU, scroll down or click [here](#) to see Sections 8 and 9 for an overview of your privacy rights and instructions on how to submit a privacy request.

### 1. Information We Collect

We may collect a variety of information about you or your devices from various sources, as described below. We may collect different information from you for different purposes depending on your relationship with The Leadership Circle. This section gives a general overview of our practices. To see a more detailed description of the ways in which we use each type of data we collect, how long it is retained, and what categories of third parties we may disclose it to, go to the “Leadership Circle Detailed Privacy Notice” by clicking [here](#) or scrolling down.

The Personal Information we collect includes:

**A. Information You Provide to Us**

**Registration Information.** If you sign up for an account, register to use our Services, or sign up for emails or other updates, we may ask you for basic contact information, including some professional information, such as name, email, phone number, mailing address, title, or employer.

**Communications.** If you contact us directly, we may collect additional information from you. For example, when you reach out to our customer support team, we may ask for your name, email address, mailing address, phone number, or other contact information so that we can verify your identity and communicate with you. We may also store the contents of any message or attachments that you send to us, as well as any information you submit through any of our forms or questionnaires.

**Events.** If you register for an event that we host, whether in-person or online, we may collect relevant information such as your name, address, title, company, phone number, and email address, as well as specific information relevant to the event for which you are registering.

**User Content.** We allow Users of our Services to view some content generated by others. This may include evaluations, comments, reviews, or other User-generated content. We may collect certain demographic information from Users directly or from other Users of our Services, including age, gender, race or ethnicity, income, or other demographic information in addition to leadership evaluation information submitted by Business Clients, Leaders, and Evaluators via survey responses or other collection methods, such as through communications with Coaches. Such User Content is shared with the Practitioner/coach working with the Leader and Business Client it regards, in accordance with the terms of that User's agreement with The Leadership Circle.

**Payment Information.** If you make a payment for Services, your payment-related information, such as credit card, bank account, or other financial information, may be collected by our third-party payment processor on our behalf.

**Job Applications.** If you apply for a job with us, we may collect relevant information such as your name, phone number, email address, position, job history, education history, references, a cover letter, and similar information.

**B. Information We Collect Automatically When You Use Our Services.**

**Device Information.** We may collect information about the devices and software you use to access our Services, such as your IP address, web browser type, operating system version, device identifiers, and similar information.

**Usage Information.** To help us understand how you use our Services and to help us improve them, we may collect data about your interactions with our Services. This includes information such as crash reports, session lengths and times, the pages or other content you view, and any searches you conduct.

**Cookies and Similar Technologies.** We and our third-party partners may collect information using cookies, pixel tags, or similar technologies. Cookies are small pieces of data that our website can ask

your web browser to store on your computer or mobile device. The cookies allow the website to “remember: your actions or preferences over time. We may use both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to our Services. A cookie is a small piece of data that a website asks your browser to store on your computer or mobile device. The cookie allows the website to "remember" your actions or preferences over time.

### **C. Information We Receive from Other Sources**

We may receive information about you from other sources, including third parties that help us update, expand, and analyze our records, identify new customers, or detect or prevent fraud. We may also receive information about you from social media platforms, for example when you interact with us on those platforms or access our social media content. What information we receive from third parties is governed by the privacy settings, policies, and/or procedures of the relevant organizations, and we encourage you to review them.

#### **2. How We Use the Information We Collect**

We may use the information we collect:

- To provide, maintain, improve, and enhance our Services, including to improve our leadership trainings and metrics by including your deidentified or aggregated information in the data sets we use for research and training purposes;
- To understand and analyze how you use our Services and develop new products, services, features, and functionality;
- To facilitate purchases of products or services that you order;
- To host events;
- To allow you to share content with other Users of our Services;
- To evaluate and process applications for jobs with us;
- To communicate with you, provide you with updates and other information relating to our Services, provide information that you request, respond to comments and questions, and otherwise provide User support;
- For marketing and advertising purposes, including developing and providing promotional and advertising materials that may be relevant, valuable or otherwise of interest to you;
- To detect and prevent fraud, and respond to trust and safety issues that may arise;
- For compliance purposes, including enforcing our Terms of Service or other legal rights, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency; and
- For other purposes for which we provide specific notice at the time the information is collected.

#### **3. How We Share the Information We Collect**

**Service Providers.** We may share any information we collect with service providers retained in connection with the provision of our Services. These companies are only permitted to use this information to help us provide our Services, not for their own purposes. Service Providers, also called “Processors” are essential to our ability to do things like send communications via email, support the app, store data in the cloud, and other data processing activities.

**Our Affiliates.** We may share your information with our affiliates, subsidiaries, and representatives as needed to provide our Services.

**Other Users.** Content you create, including comments and evaluations, may be displayed to the individual it is about, as disclosed and consented to when your evaluation of the individual is solicited. For example, Evaluators' assessments will be reviewed by Practitioners, who will analyze the information provided about a Leader and then use that information in order to better coach the Leader, sharing the Evaluations (but not disclosing which Evaluators made which comments). That information may also be shared with the Business Client who solicited our Services on behalf of the Leader and entered into an engagement with us. As part of this process, information is also passed via our processors, such as our email service provider and cloud hosting platform for the app through which the evaluations and analysis of Leaders is completed and shared.

**Our Partners.** We use analytics services to collect and process certain analytics data. These services may also collect information about your use of other websites, apps, and online resources. We also work with third-party advertising partners. These partners include:

Partner	Description	More Information
Google	We use Google's services to collect and process analytics data and to place ads that we think may interest our users and potential users.	<a href="#">Google Privacy and Terms</a>
Facebook	We use Facebook's services to place ads that we think may interest our users and potential users.	<a href="#">Meta [Facebook] Data Policy</a> <a href="#">Facebook Advertising</a>
LinkedIn	We may use LinkedIn's services to place ads that we think may interest our users and potential users, as well as to advertise openings to potential employees.	<a href="#">LinkedIn Privacy Policy</a> <a href="#">LinkedIn Cookie Policy</a>

Please note that this table may be updated from time to time to provide you with the latest information. For more information about your choices regarding how these partners use your information, see the [Your Choices](#) section below.

**As Required by Law and Similar Disclosures.** We may access, preserve, and disclose your information if we believe doing so is required or appropriate to: (a) comply with law enforcement requests and legal process, such as a court order or subpoena; (b) respond to your requests; or (c) protect your, our, or others' rights, property, or safety. In particular, we may disclose relevant information to the appropriate third parties if you post any illegal, threatening, or objectionable content on or through the Services.

**Events.** We may share your information with event partners, vendors, or co-sponsors to facilitate the events for which you register.

**Merger, Sale, or Other Asset Transfers.** We may transfer your information to service providers, advisors, potential transactional partners, or other third parties in connection with the consideration, negotiation, or completion of a corporate transaction in which we are acquired by or merged with another company or in which we sell, liquidate, or transfer all or a portion of our assets. The use of your information following any of these events will be governed by the provisions of this Privacy Policy in effect at the time the applicable information was collected.

**Consent.** We may also disclose your information with your permission.

#### **4. Your Choices**

**Our Communications.** From time to time you may receive marketing or other informational email messages from us. You can unsubscribe from our promotional and informational emails via the link provided in the emails. Users may continue to receive administrative messages from us necessary to service User accounts after opting out of receiving promotional messages from us.

**Our Partners.** You can learn more about Google's privacy practices and your options about how they use your information on Google's [website](#). You can also install the [Google Analytics Opt-out Browser Add-on](#). Meta, the parent company of Facebook, provides information about how it uses the information it collects through our Services in its [Data Policy](#). You can also learn specifically about Facebook's advertising practices on its [website](#). You can learn more about LinkedIn's privacy practices and your options about how they use your information on LinkedIn's [website](#). You can have the ability to control your privacy settings on LinkedIn and can see instructions for doing so by [clicking here](#). Some of our advertising partners are members of the [Network Advertising Initiative](#) or the [Digital Advertising Alliance](#). You can visit those organizations' websites to learn about how you may opt out of receiving web-based personalized ads from their member companies. You can also access any settings offered by your mobile operating system to limit ad tracking. To inquire about your choices regarding our business partners generally, contact us at [privacy@leadershipcircle.com](mailto:privacy@leadershipcircle.com).

#### **5. Third-Party Content**

Our Services may contain links to other websites, products, or services that we do not own or operate. We are not responsible for the content provided by, or the privacy practices of, these third parties. Please be aware that this Privacy Policy does not apply to your activities on these third-party services or any information you disclose to these third parties. We encourage you to read their privacy policies before providing any information to them.

#### **6. Security and Retention**

We make reasonable efforts to protect your information by using administrative, technological, and physical safeguards designed to maintain and improve the security and integrity of the information we maintain and protect it from accidental loss, unauthorized access or use, or any other inappropriate or unlawful processing. However, because no information system can be 100% secure, we cannot guarantee the absolute security of your information.

Upon written request, we take measures to delete or anonymize your Personal Data unless we are required by law to keep the identifiable data for a longer period. When determining the retention

period, we take into account various criteria, such as the type of products or services provided to you, the nature and length of our relationship with you, mandatory retention periods, and applicable statutes of limitations. Unless a deletion is request, we maintain the information submitted about or by a Leader throughout the Leader's professional career in order to enable them to benchmark and improve upon their performance due to the nature of the Service we are providing.

## **7. Children's Privacy**

We do not knowingly collect, maintain, or use personal information from children under 18 years of age, and no part of our Services are directed toward children. If you learn that a child has provided us with personal information in violation of this Privacy Policy, then you may alert us at [privacy@leadershipcircle.com](mailto:privacy@leadershipcircle.com).

## **8. International Visitors**

Our web Services are hosted in the United States and are intended for visitors located within the United States. If you choose to use the Services from the European Union or other regions of the world with laws governing data collection and use that may differ from U.S. law, then please note that you are transferring your personal information outside of those regions to the United States for storage and processing. Also, we may transfer your data from the U.S. to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating the Services.

If you are located in the European Union or the United Kingdom, click [here](#) or scroll down to Section 11 to review your data privacy rights and our instructions on how to exercise those rights and click [here](#) or scroll to Section 11A, our Legal Bases for Processing Your Personal Data. You can also go to our Detailed Privacy Notice by clicking [here](#) or scrolling down to review in detail how your data is collected, processed, and disclosed.

## **9. Changes to this Privacy Policy**

We will post any adjustments to the Privacy Policy on this page, and the revised version will be effective when it is posted. If we make material changes, we may notify you via a notice posted on our website or other method. We encourage you to read this Privacy Policy periodically to stay up to date about our privacy practices.

## **10. Contact Information**

If you have any questions, comments, or concerns about our processing activities, please email us at [privacy@leadershipcircle.com](mailto:privacy@leadershipcircle.com). Or you may write to us at:

Privacy Team  
Leadership Circle  
132 East 14075 South Draper, Utah 84020

For international visitors, please contact us at:

Impressors Bros, 1.  
Girona, Spain. 17001  
Inquiries: +34 972 436 488

## 11. Your Rights in the European Union and the United Kingdom

As provided under applicable law and subject to any limitations in such law, you have the following rights if you are in the European Union or the United Kingdom:

- **Access and Portability.** You may ask us to provide you with a copy of the Personal Data we maintain about you, including a machine-readable copy of the Personal Data that you have directly provided to us, and request certain information about its processing.
- **Rectification.** You may ask us to update and correct inaccuracies in your Personal Data.
- **Deletion.** You may ask to have your Personal Data anonymized or deleted, as appropriate.
- **Restriction and Objection.** You may ask us to restrict the processing of your Personal Data or object to such processing.
- **Consent Withdrawal.** You may withdraw any consent you previously provided to us regarding the processing of your Personal Data at any time and free of charge. We will apply your preferences going forward. This will not affect the lawfulness of the processing before you withdrew your consent.
- **Complaint.** You may lodge a complaint with a supervisory authority, including in your country of residence, place of work, or where you believe an incident took place.

You may exercise these rights by contacting us using the contact details in Section 10 of this Policy. Note that applicable laws contain certain exceptions and limitations to each of these rights.

### A. Legal Bases for Processing Your Personal Data in the EU and UK

For Users in the European Union or United Kingdom, we rely on various legal bases to process your Personal Data, including:

- **Consent.** You may have consented to the use of your Personal Data, for example to send you electronic marketing communications or for the use of certain cookies. If consent is the legal basis for processing sensitive Personal Data, it will be explicitly collected for the purposes specified. By using our Services as a Business Client, Leader, or Evaluator, you expressly consent to the transfer, storage, and processing of your information as described in this Privacy Policy and in any agreement you have entered into with The Leadership Circle.
- **Contract.** We need your Personal Data to provide you with our Services and to respond to your inquiries.
- **Legal.** We may have a legal obligation to process your Personal Data, for example to comply with tax and accounting obligations, and we may process your Personal Data when necessary to establish, exercise, or defend legal claims. We may also process your Personal Data when necessary to protect your or another individual's vital interests.

- **Legitimate Interest.** We or a third party have a legitimate interest in using your Personal Data, for example to prevent fraud. We only rely on this legal basis when such legitimate interests are not overridden by your interests or your fundamental rights and freedoms.

# The Leadership Circle Detailed US Privacy Notice

## 1. Information for US Residents

We collect Personal Data from US residents and comply with the consumer privacy laws of California, Colorado, Connecticut, Utah, and Virginia (“US Privacy Laws”). This Detailed US Privacy Notice applies to US residents (“users,” “you,” or “your”).

For the purposes of this Detailed US Privacy Notice, “Personal Data” means information that is linked or reasonably linkable to a particular individual or household. However, the following categories of information are not Personal Data:

- Publicly available information;
- Deidentified or aggregated data; or
- Information otherwise excluded from the scope of US Privacy Laws.

This Privacy Notice provides the following information to US residents:

- Categories of Personal Data we collect;
- Purposes for which we use Personal Data;
- Categories of Personal Data we disclose to third parties;
- Categories of third parties to which we disclose Personal Data; and
- How US residents can exercise their rights under US Privacy Laws:
  - The rights to access, correct, or delete Personal Data;
  - The right to obtain a portable copy of Personal Data;
  - The right to limit the use of sensitive personal data in certain circumstances;
  - The rights to opt out of targeted advertising, sales of personal data, or profiling; and
  - The right to appeal our decisions about your requests.

## 2. Categories of Personal Data

The table below outlines the non-sensitive categories of Personal Data that The Leadership Circle collects about US residents and whether and how each category of data is disclosed to third parties.

We collect Non-Sensitive Personal Data from the following sources:

- Directly from our users
- Inferences from your activity
- From our affiliates
- From our business partners
- From our advertising partners
- From data brokers

**Category of Personal Data:**

Identifiers

**Examples**

Identifiers we collect may contain the following: names, aliases, business or personal address, unique personal identifiers, IP address, email address, account name, and other similar identifiers.

**Purpose(s)**

Providing personalized services, targeted advertising, improvement of our services, compliance with statutory obligations, and analyzing patterns and outcomes for our Leaders in order to improve our products and offerings.

**Targeted Advertising**

We may share this data with advertising partners for targeted advertising purposes.

**Sale**

This data is not sold to third parties.

**Sharing.**

This data may be shared with Processors, Users of our services (such as Practitioners or Business Clients, as described in the General Privacy Notice above), and Affiliates. See Section 3 of the General Privacy Notice above for information about sharing with Processors, Users, and Affiliates.

**Category of Personal Data:**

Personal Characteristics

**Examples**

Personal Characteristics we collect may contain the following: socioeconomic status or background. Personal Characteristics are not specifically solicited from our Users but are sometimes submitted by Users as part of their free form responses to questionnaires or other evaluation services included in our offerings.

<b>Purpose(s)</b>
Providing personalized services, improvement of services, and analyzing patterns in order to improve our products and offerings.
<b>Targeted Advertising</b>
We do not engage in targeted advertising or share this data for targeted advertising purposes.
<b>Sale</b>
This data is not sold to third parties.
<b>Sharing</b>
This data may be shared with Processors and Users of our services. See Section 3 of the General Privacy Notice above for information about sharing with Processors and Users.
<b>Category of Personal Data:</b>
Commercial Data
<b>Examples</b>
Commercial Data may contain the following: If you make a payment for Services, your payment-related information, such as credit card, bank account, or other financial information, may be collected by our third-party payment processor on our behalf. We also store the history of services purchased from Us.
<b>Purpose(s)</b>
To enable Us to process payments; provide support to current customers; reach out to customers to re-engage them with our Services and provide them with ongoing information regarding new or ongoing Services, promotions, other marketing information; and provide historical benchmarks for a Leader regarding their progress in different areas that we have evaluated and coached them on in the past.
<b>Targeted Advertising</b>
We do not engage in targeted advertising or share this data for targeted advertising purposes.

<b>Sale</b>
This data is not sold to third parties.
<b>Sharing</b>
This data may be shared with Processors. See Section 3 of the General Privacy Notice above for information about sharing with Processors.
<b>Category of Personal Data:</b>
Internet/Electronic Activity
<b>Examples</b>
Internet/Electronic Activity may contain the following: Internet IP addresses, advertising IDs, session browsing information, and cookies.
<b>Purpose(s)</b>
debugging and security purposes. We also collect this information to optimize our websites and better present content to our visitors based on their usage statistics.
<b>Targeted Advertising</b>
We may share this data with advertising partners for targeted advertising purposes.
<b>Sale</b>
This data is not sold to third parties.
<b>Sharing</b>
This data may be shared with Processors. See Section 3 of the General Privacy Notice above for information about sharing with Processors.

**Category of Personal Data:**

**Imprecise Geolocational Data**

**Examples**

Imprecise Geolocational Data may contain the following: locational data connected to an IP address, which we may connect to a location within a zip code.

**Purpose(s)**

optimizing webpages for language and determining which services are available in a visitor's area so that we can serve them with direct marketing options based on their location.

**Targeted Advertising**

We may share this data with advertising partners for targeted advertising purposes.

**Sale**

This data is not sold to third parties.

**Sharing**

This data may be shared with Processors. See Section 3 of the General Privacy Notice above for information about sharing with Processors.

**Category of Personal Data:**

**Sensory Data**

**Examples**

Sensory Data may contain the following: Recordings of video meetings between Practitioners and Leaders; photographs and recordings from Leadership Circle events; phone call recordings and voicemails from the customer support center.

**Purpose(s)**

providing Leaders with the ability to review the feedback provided by Practitioners/Coaches; being able to record and respond to support inquiries; being able to use photo and video recordings for future marketing and related business support services.

**Targeted Advertising**

We do not engage in targeted advertising or share this data for targeted advertising purposes.

**Sale**

This data is not sold to third parties.

**Sharing**

This data may be shared with Processors. See Section 3 of the General Privacy Notice above for information about sharing with Processors.

**Category of Personal Data:**

Professional Data

**Examples**

Professional Data may contain the following: For Leaders we collect title, job history, performance evaluations, salary, and evaluations by Business Clients and Evaluators, as well as professional contact information. For Practitioners, we collect the same information as well as evaluations and reviews of the Practitioners' work. For Evaluators, we collect name, title, contact information, and the relationship between the Evaluator and the Leader they are evaluating.

**Purpose(s)**

In order to provide contracted-for services.

**Targeted Advertising**

We may share this data with advertising partners for targeted advertising purposes.

**Sale**

This data is not sold to third parties.

<b>Sharing</b>
This data may be shared with Processors, Users of our services, and Affiliates or Business Partners. See Section 3 of the General Privacy Notice above for information about sharing with Processors, Users, Affiliates, and Partners.
<b>Category of Personal Data:</b>
Educational Data
<b>Examples</b>
Educational Data may contain the following: degrees attained, dates of attendance, academic records in some circumstances, other educational information as reported on the resume or CV submitted by the Leader or the Business Client.
<b>Purpose(s)</b>
To provide Practitioners with proper information to assist in providing the Services as well as to enable Leadership Circle to evaluate the credentials of practitioners and coaches.
<b>Targeted Advertising</b>
We do not engage in targeted advertising or share this data for targeted advertising purposes.
<b>Sale</b>
This data is not sold to third parties.
<b>Sharing</b>
This data may be shared with Processors, Affiliates, and Business Partners. See Section 3 of the General Privacy Notice above for information about sharing with Processors, Affiliates, and Partners.
<b>Category of Personal Data:</b>
Inferences
<b>Examples</b>
Inferences may contain the following: Based on an analysis of the other data points collected, we make inferences regarding an individual's leadership style, effectiveness, and are able to advise on methods to adopt for positive growth.

<b>Purpose(s)</b>
To enable better analysis by Practitioners so that better leadership training can be provided.
<b>Targeted Advertising</b>
We do not engage in targeted advertising or share this data for targeted advertising purposes.
<b>Sale</b>
This data is not sold to third parties.
<b>Sharing</b>
This data may be shared with Processors and Users. See Section 3 of the General Privacy Notice above for information about sharing with Processors and Users (specifically, inference information may be shared with Practitioners to enable them to perform coaching services).

### 3. Categories of Sensitive Personal Data

The table below outlines the categories of Sensitive Personal Data that The Leadership Circle collects about US residents and whether and how each category of sensitive data is disclosed to third parties. The Leadership Circle obtains affirmative consent from US residents to process Sensitive Personal Data to the extent required by US Privacy Laws.

We collect Sensitive Personal Data from the following sources:

- Directly from our users

<b>Category of Sensitive Personal Data:</b>
Sensitive Category Data
<b>Examples</b>
Sensitive Category Data may contain the following: gender and race or ethnicity.

<b>Purpose(s)</b>
Creating a tailored leadership assessment and coaching program requires collecting a number of data points, potentially including some sensitive information, in order for the leadership Coach to best assist the Leader in addressing gaps and successes in the Leader's style.
<b>Targeted Advertising</b>
We do not engage in targeted advertising or share this data for targeted advertising purposes.
<b>Sale</b>
This data is not sold to third parties.
<b>Sharing</b>
This data may be shared with Processors and Users. See Section 3 of the General Privacy Notice above for information about sharing with Processors and Users (specifically, this information may be shared with Practitioners to enable them to perform coaching services).

#### 4. Use of Personal Data

We use Personal Data for the purposes described above. Personal Data may also be used or disclosed as otherwise permitted or required by applicable law.

#### 5. Disclosing Personal Data

We share Personal Data with the following categories of third parties:

- Processors: We use processors to securely handle Personal Data on our behalf and only on our instructions. These companies may not use your Personal Data for their own purposes.
- Affiliates: We may share your information with our affiliates, subsidiaries, and representatives as part of providing our services.
- Users: Content you post on our systems, such as comments or reviews, may be displayed to other users as appropriate. A description of this practice is provided in Section 3 of the General Privacy Notice above.
- Our Analytics and Advertising Partners: We use analytics services to collect and process certain data and to provide you with relevant advertising. These services may also collect information about your use of certain other websites, apps, and online resources.
- Our Business Partners: We may share relevant personal data with our business partners to provide you with exclusive offers for products and services that may interest you.

See the tables above for more details about how different categories of Personal Data are shared.

We do not sell Personal Data to anyone.

## **6. Exercising Your Personal Data Rights**

US residents have the following rights under US Privacy Laws:

- The rights to access, correct, or delete Personal Data;
- The right to obtain a portable copy of Personal Data;
- The right to limit the use of Sensitive Personal Data in certain circumstances;
- The rights to opt out of targeted advertising, sales of personal data, or profiling; and
- The right to appeal our decisions about your requests if you disagree with them.

If you are a US resident, you can submit a request to exercise your personal data rights under US Privacy Laws by calling us at (800) 895-0399 or submitting it at <https://leadershipcircle.com/contact/>. After clicking the link, select “General Inquiries” under “How Can We Help You” and provide us with the requested information and a description of which of the above rights you would like to exercise. Someone will confirm receipt of your request within 10 days, and we will do your best to fulfill your request within 45 days.

To protect your privacy, we may need to authenticate your identity before we respond to your rights request. We will use commercially reasonable efforts to verify your identity for this purpose. Any information you provide to authenticate your identity will only be used to process your rights request. If you have a password-protected online account with us, we may require you to submit your rights request securely through that account. Please be aware that we do not accept or process rights requests through other means (e.g., via fax or social media).

If we suspect fraudulent or malicious activity on or from your account, we will delay taking action on your request until we can appropriately verify your identity and the request as authentic. Also note that each of the rights are subject to certain exceptions. If you believe our response to your rights request is insufficient, you can appeal our decision by contacting us at [privacy@leadershipcircle.com](mailto:privacy@leadershipcircle.com), and we will inform you of our final decision within 45 days.

We reserve the right to decline to process, or charge a reasonable fee for, requests from a US resident that are manifestly unfounded, excessive, or repetitive.

### **A. Targeted Advertising**

“Targeted advertising” as used in this Privacy Notice means the disclosure of Personal Data to a third party for behavioral advertising. An example of this is displaying advertisements to a US resident where the advertisement is selected based on Personal Data obtained from that person’s activities over time and across nonaffiliated websites or online applications to predict such person’s preferences or interests. We share some Personal Data for behavioral advertising. You can opt out of the sharing of your Personal Data for targeted advertising by submitting a rights request as described above.

## **B. Limiting the Use of Sensitive Personal Data**

You have the right to limit some uses of Sensitive Personal Data. In particular, you may direct companies not to use Sensitive Personal Data except as necessary to provide goods or services you have requested.

You may submit a request to limit the use of your sensitive Personal Data by submitting a rights request as described above.

## **C. Authorized Agent Requests**

You may designate an authorized agent to make a rights request on your behalf. Your authorized agent may submit such a request by following the same method described above. We may require verification of your authorized agent in addition to the information for verification above for US residents and households. Such verification will include written authorization from the consumer for the agent to act on their behalf in making the request or a Power of Attorney.

## **7. Contact Us**

If you have any questions or concerns regarding this Detailed US Privacy Notice, contact us at [privacy@leadershipcircle.com](mailto:privacy@leadershipcircle.com).

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