

## Privacy Policy

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## PRIVACY POLICY

### 1. What this policy covers

GLOBAL ASSESSOR POOL, LLC, dba Pinsight® (“Company” or “we” or “us”) is committed to protecting your privacy. We prepared this Privacy Policy to describe our practices regarding the information we collect from users of our websites, located at <http://www.pinsight.com>, <https://www.leaderhabit.com/>, <https://app.pinsight.com/>, and use of our related services (including any web or mobile applications).

### 2. Information we collect

We collect information directly from you, when you access our websites and related services, from 3<sup>rd</sup> parties, and automatically when you access our websites and platform.

#### *Information you give us*

We collect information from you when you become a Pinsight user as an account owner or admin, as an assessor, as a stakeholder, or as a participant in the Leader Readiness Platform and/or the Leader Habit app. We collect this information when you create or change your profile information including your contact information, time zone, profile picture, and your notification preferences.

We collect information you provide to us when you enroll in a webinar, request a demo, participate in an online chat, subscribe to our newsletter, or take the Leader Habit Quiz. For example, when you request a demo, we must have your contact information, so we can contact you to schedule the demo. When you take the Leader Habit Quiz, we collect your responses to a set of questions that comprise the quiz and we collect your email address, so we can deliver your report.

#### *Information collected when you use our services*

When you use the Leader Readiness Platform, we record all of the actions you take. If you are an administrator, we record who you invite to assessments and who you share reports with. If you are participating in a Pinsight assessment as an assessor, we record any role-plays you participate in, the scores you assign, and when you log in and out of the platform. If you are participating in a Pinsight assessment as a participant, we collect and store all of the emails and file attachments that you send during the pre-work stage and the live simulation. We also record and save voice mail messages you leave, calendar appointments you make, and online chats and role-plays you participate in. Trained assessors use this information to score your performance on a variety of exercises. These scores are recorded and used to create a report on your performance. If you have access to the Leader Habit App, we record usage data, for example, when you log into your account, when you complete an exercise, comments you enter, and improvement over time.

#### *Information collected from others*

We may receive information about you from others. For example, if you are participating in an assessment at the request of one of our clients, we may receive your contact information from our

client so that we can invite you to become a Pinsight user. After accepting an invitation, you will be able to update your profile and make changes to your personal information.

We may also collect data from companies contracted by us to provide add-on services to our platform. We currently contract with “cut-e” an Aon company that provides one of the components of our assessments. If you participate in one of our assessments, you will complete a learning efficiency test. After completing the learning efficiency test, cut-e provides Pinsight with the results of your test using an anonymous numerical identifier generated by Pinsight. For more information about cut-e visit <https://www.cut-e.com/assessment-solutions/>

### ***Information Collected automatically via your devices and browsers***

To make our website and related services more useful to you, our servers (which may be hosted by a third-party service provider) collect information about the devices and computers you use to access our website and services. This includes browser type, operating system, Internet Protocol (IP) address, domain name, and/or the date and time of your visit. We also use [Cookies](#) and navigational data to gather information regarding the date and time and duration of your visit, what you searched for, and the pages you viewed. Like most Internet services, we automatically gather this information and store it in log files each time you visit our website or access your account on our network.

### **What are “Cookies”?**

Cookies are small pieces of information that a website sends to your computer’s hard drive while you are viewing a web site. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on our website. Persistent Cookies can be removed by following Internet browser help file directions. If you choose to disable Cookies, some areas of our website or service may not work properly.

### **Analytics**

We use Google Analytics and Squarespace Analytics on our websites. Google Analytics and Squarespace Analytics use cookies to help us analyze how you use our website. The information generated by a cookie about your use of the website (including your IP address) is transmitted to and stored by Google and Squarespace on servers in the United States. Both companies use this information to evaluate your use of the site, compile reports on site activity for us, and provide other services relating to site activity and internet usage. This analytics data is not tied to any Personal Information. For more information about Google Analytics, please visit [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/). For more information about Squarespace Analytics please visit <https://support.squarespace.com/hc/en-us/articles/206544167-Squarespace-Analytics-overview>

We use Zoho Chat on our website and in the Leader Readiness Platform. Zoho Chat is a live chat app that uses cookies for website visitor tracking. This enables us to identify your location on our site and initiate a conversation with you. For example, if you have a question while taking an assessment, Zoho Chat allows you to ask the question and get a response in real time from a Pinsight employee. For more information about Zoho Chat, please visit <https://www.zoho.com/salesiq/>



We use TokBox in the Leader Readiness Platform. TokBox is a 3rd party software we use for conducting videocalls. For more information about TokBox, please visit <https://tokbox.com/>

We use the LinkedIn Insight Tag on our Pinsight.com website. The LinkedIn Insight Tag enables the collection of metadata such as IP address information, timestamp, and events (e.g. page views). The LinkedIn browser cookie is stored in a user's browser until a user deletes the cookie or the cookie expires (there's a rolling six-month expiration from the last time the user's browser loaded the Insight Tag). Users have full control to block or delete cookies.

We use the Google Ads remarketing tag (tracking cookie) on every page of our Pinsight.com website. The Google Ads remarketing service allows us to re-target advertisements to previous website visitors on third-party sites, including the Google search results page and websites in the Google Display Network. Google uses cookies to serve ads based on the website visitor's past visits to Pinsight.com. Any data collected will be used in accordance with our own and Google's privacy policy. The collected data does not personally or directly identify the website visitor.

Users may opt out of Google's use of cookies by visiting the [Google Advertising Opt-out Page](#). Users may opt out of Google Analytics by visiting the Google Analytics Opt-out Page.

We currently do not respond to Do Not Track signals.

### **3. How we use information we collect**

We do not sell, trade, share, or rent your personal information to third parties to use for their own marketing purposes. We use the information we collect for the following purposes:

#### ***To provide our services and communicate with you***

We use your contact information to deliver our services. For example, we use your user name and password to authenticate you when you log in and identify you as a user on our system, we use your contact information to provide customer support, we use your time zone information when scheduling assessments, we use your email address to deliver quiz results and newsletters and depending on your notifications preferences, we send you administrative notifications. We also use your information to inform you of new features or products that we think you would be interested in. You can control marketing communications via the "Unsubscribe" link in an email. You can adjust your user notifications by using your notification preferences in your profile.

We use the data that we collect when you participate in an assessment or use the Leader Habit app to create your Pinsight report. When you participate in an assessment, you complete a learning efficiency test, a personality questionnaire, and a live simulation. The results from these assessments are all used to create your Pinsight report. If you use the Leader Habit app, we track when you enter information and use this information to estimate your improvement.

#### ***For research and development***

We may create anonymous data records by excluding information (such as your name) that makes the data personally identifiable to you. We use this anonymous data to analyze request and usage patterns to enhance the content of our services and improve site navigation. We may also use anonymous data

for research and development purposes, such as scientific articles and presentations, assessor training, and to enhance our services.

#### ***To comply with Law***

We may use your information to comply with legal obligations, as part of our general business operations, and for other business administration purposes, also to meet national security or law enforcement requirements.

## **4. How we share information**

We do not share your personal information except in the following limited circumstances.

#### ***We share information with our clients***

We share your information with our clients when they engage Pinsight and through our client, you participate in a Pinsight assessment. We disclose assessment information and provide access to your reports to the client that has engaged us. Information collected during an assessment is maintained in our database. However, downloadable PDF reports may be kept at a client site.

#### ***We share information with Pinsight or partner assessors***

We share your personal information and assessment information, including recorded role-plays, emails notes, calendar entries, and voice mails with Pinsight assessors or partner assessors who are directly involved in your assessment when you participate in a Pinsight assessment. Sharing this information is essential for assessors to complete scoring assignments and for your assessment report to be generated.

#### ***Third Party Links and Websites***

We may provide links to other websites or locations for your convenience. This does not signify our endorsement of the website, the location, or its contents. When you choose to click on a link, you will leave our site and go to another site. During this process, another entity may collect information from you. We have no control over, do not review, and cannot be responsible for these outside websites or their content. Please be aware that the terms of this Privacy Policy do not apply to these outside websites or content, or to any collection of data after you click on links to outside websites.

## **5. Legal basis for processing personal information (EEA residents only)**

If you are a resident of the European Economic Area, our legal basis for collecting and using your personal information will depend on the personal information concerned and the specific context in which we collect it. However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms.

If we ask you to provide personal information to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information). We will also provide you with the option to withdraw consent.

Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under “How to contact us”.

In cases of onward transfer to third parties of data of EU and Swiss individuals received pursuant to the EU-US Privacy Shield and Swiss-US Privacy Shield, Pinsight is potentially liable.

## **6. How we store and secure information**

We use data hosting service providers in the United States to host the information we collect. We use a variety of industry-standard security technologies and procedures to help protect your information from unauthorized access, use, or disclosure. We may require you to enter a password to access your account information. Please do not disclose your account password to unauthorized people. Despite these measures, you should know that no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that data, during transmission through the Internet or while stored on our systems or otherwise in our care, is absolutely safe from intrusion by others.

## **7. How long we keep information**

We retain personal information we collect from you where we have an ongoing legitimate business need to do so, for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **8. Your Choices**

We offer you choices regarding the collection, use, and sharing of your information.

### ***Access and update your information***

You can access and update certain information about yourself. For example, in the Leader Readiness Platform you can access your profile information by logging into your account. You can update your contact information, time zone, notification preferences, and photo within your profile. If you are an assessor, you can also update your availability in the assessor calendar. If you subscribe to our newsletter, you can update your profile by clicking Update Profile in the newsletter.

## ***Delete your information***

You may request deletion of your information by us, but please note that we may be required (by law or otherwise) to keep this information and not delete it (or to keep this information for a certain time, in which case we will comply with your deletion request only after we have fulfilled such requirements). When we delete any information, it will be deleted from the active database, but may remain in our archives.

## ***Opt out of marketing communications***

You may opt out of receiving promotional communications from us by using the unsubscribe link within each email or by contacting us [as provided below](#) to have your contact information removed from our promotional email list.

## **9. Our Policy about children**

We do not intentionally gather information about visitors who are under the age of 18. If you are under the age of 18 you should not use our site or service.

## **10. Updates to this Privacy Policy**

We may update this Privacy Policy because of changes of legal, technical or business developments. If we make any substantial changes in the way we use your information, we will notify you by sending you an e-mail to the last e-mail address you provided to us and/or by prominently posting notice of the changes on our website.

## **11. Privacy Shield**

Pinsight complies with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States. Pinsight has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>

In compliance with the Privacy Shield Principles, Pinsight commits to resolve complaints about our collection or use of your personal information. EU and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact Pinsight at: PO Box 18576, Denver, CO 80218 or at (800) 423-8295.

Pinsight has further committed to refer unresolved Privacy Shield complaints to American Arbitration Association, an alternative dispute resolution provider located in the [United States]. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please visit the [American Arbitration Association](#) website for more information or to file a complaint. The services of American Arbitration Association are provided at no cost to you. Pinsight commits to cooperate with EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) and comply with the advice given by such authorities with regard to human resources data transferred from the EU and Switzerland in the context of the



employment relationship. Pinsight is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC) the possibility, under certain conditions, for the individual to invoke binding arbitration.

## **12.How to contact us**

We welcome your comments or questions regarding this Privacy Policy. Please e-mail us at [dpo@pinsight.com](mailto:dpo@pinsight.com) or contact us at the following address or phone number: Pinsight, LLC, PO Box 18576, Denver, CO 80218, (800) 423-8295