

## Privacy Policy

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## PRIVACY POLICY

GLOBAL ASSESSOR POOL, LLC, dba Pinsight® (“Pinsight” or “we” or “us”) is committed to protecting your privacy. We prepared this Privacy Policy to describe our practices regarding the personal information we collect in connection with our websites that link to this Privacy Policy, including <http://www.pinsight.com>, <https://www.leaderhabit.com/> and <https://app.pinsight.com/>, our mobile applications, our emails and other communications, and our related services (collectively, the “Services”).

### 1. 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 or use our Services.

#### *Information you give us*

We collect information from you when you provide it to us, such as when you become a Pinsight user as an account owner or admin, as an assessor, as a stakeholder, or as a participant in the Pinsight Platform, and/or The Pinsight 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 may also collect information you provide to us when you enroll in a webinar, request a demo, participate in an online chat, or subscribe to our newsletter. For example, when you request a demo, we must have your contact information, so we can contact you to schedule the demo.

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

When you use the Pinsight Platform, we record all 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 video and/or audio sessions 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, online chats and video/audio sessions 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.

### ***Information Collected automatically***

Pinsight, our service providers, and our advertising partners may automatically log information about you, your computer, or your mobile device, and your activity over time on our Services and other sites and online services. Device information that we collect may include browser type, operating system, wireless carrier, manufacturer and model, screen resolution, Internet Protocol (IP) address, and general location information. We may also collect activity and navigational data automatically, such as the date and time and duration of your visit, what you searched for, the website you visited before browsing to the Services, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, and the pages or screens 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. We also use cookies and similar technologies to facilitate some of our automatic data collection, such as:

- **Cookies**, which are small pieces of information that a website sends to your computer's hard drive while you are viewing a web site. Cookies help to uniquely identify the visitor's browser or to store information or settings in the browser for the purpose of helping you navigate between pages efficiently, remembering your preferences, enabling functionality, helping us understand user activity and patterns, and facilitating online advertising. 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.
- **Flash cookies**, or locally stored objects, which are used on websites for purposes similar to cookies but allow storage of a larger amount of data.
- **Web beacons**, also known as pixel tags or clear GIFs, which are typically used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked, typically to compile statistics about usage of websites and the success of marketing campaigns.
- **Local storage**, which is used to save data on a visitor's device. We use data from local storage to turn on web navigation, customize what we show you based on your past interactions with our services, remember your preferences, and measure ad effectiveness.
- **Session-replay technologies**, which are third-party software used to record a video replay of users' interactions with the Services. The video replay may include users' clicks, mouse

movements, scrolls, mobile app touches, typing, and other activity taken during the session. We use these replays for research and development purposes, such as to help us troubleshoot problems with the Services, understand how users interact with and use the Services, and identify areas for improvement.

- **Software development kits**, or SDKs, are third-party computer codes used in connection with our App for a variety of purposes, including to provide us with analytics regarding the use of our App, to add features or functionality to our App, or to facilitate online advertising. SDKs may enable third parties to collect information directly via our App.

For more information, please visit our Cookie Policy.

## Analytics

We use Google Analytics on our websites. Google 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 on servers in the United States. Google uses 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/).

We use Zoho Chat on our website and in the Pinsight 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 Twilio in the Pinsight Platform. Twilio is a 3rd party software we use for conducting videocalls. For more information about Twilio, please visit <https://twilio.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. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

## 2. How we use information we collect

We use the information we collect for the following purposes and as otherwise described in this Privacy Policy or at the time of collection:

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

We use your personal information to deliver the Services and to operate our business. For example, we use your username 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 results and newsletters and depending on your notifications preferences, we send you administrative notifications.

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 may complete a learning efficiency test, a personality questionnaire, a live simulation, or another form of assessment. 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 use personal information for research and development purposes, including to study and improve the Services and our business, understand, and analyze the usage trends and preferences of our users, and develop new features, functionality, products, and services. As part of these activities, 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.

### ***Direct marketing***

We may send you Pinsight-related or other direct marketing communications as permitted by law, including materials, updates, information, special offers, and promotional material from us and our

business partners. You may opt-out of our marketing communications as described in the “Your Choices” section below.

### ***Interest-based advertising***

We work with third-party advertising companies and social media companies to help us advertise our business and to display ads for our products and services. These companies may use cookies and similar technologies to collect information about you (including the online activity information and device information described above in the section called “Information Collected automatically”) over time across our Services and other websites and services or your interaction with our emails and use that information to serve ads that they think will interest you. In addition, some of these companies may use hashed customer lists that we share with them to deliver ads to you and to similar users on their platforms. You can learn more about your choices for limiting interest-based advertising in the “Your Choices” section below.

### ***For compliance, fraud prevention, and safety***

We may use personal information and disclose it to law enforcement, government authorities, and private parties as we believe necessary or appropriate to: (a) maintain the safety, security, and integrity of the Services and our products and services, business, databases, and other technology assets; (b) protect our, your, or others’ rights, privacy, safety or property (including by making and defending legal claims); (c) audit our internal processes for compliance with legal and contractual requirements and internal policies; (d) enforce the terms and conditions that govern the Services; and (e) prevent, identify, investigate, and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

### ***With your consent***

We will disclose your personal information in accordance with your prior direction or, in some cases, we may specifically ask you for your consent to collect, use, or share your personal information, such as when required by law.

## **3. How we share information**

We may share your personal information with the parties described below or otherwise in this Privacy Policy or at the time of collection:

### ***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.

### ***Pinsight or partner assessors***

We share your personal information and assessment information, such as 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.

### ***Related companies***

We may share your personal information with our affiliates, subsidiaries, and other related companies, such as when they may be involved in providing the Services now or in the future.

### ***Service providers***

We share your personal information with third parties who perform services on our behalf that are necessary for the orderly operation of our business. For example, we work with service providers that help us perform website hosting, maintenance services, database management, analytics, fraud protection, marketing, customer relationship management, finances, and other purposes.

### ***Advertising partners***

We may also share personal information with third parties who we partner with for advertising campaigns or that collect information about your activity on the Services for the purposes described in the “Interest-Based Advertising” section above.

### ***Professional advisors***

We may share personal information with persons, companies, or professional firms providing Pinsight with advice and consulting in accounting, administrative, legal, tax, financial, debt collection, and other matters.

### ***Law enforcement and others***

Under certain circumstances, we may be required to disclose personal information to law enforcement, government authorities, and other parties if required to do so by law or in response to valid requests by public authorities (e.g., a court or a government agency).

### ***Compliance***

We may disclose personal information in the good faith belief that such action is necessary to comply with a legal obligation or for the purposes described above in the section titled “Compliance, Fraud Prevention, and Safety.”

### ***Business transaction participants***

We may disclose personal information to third parties in connection with any business transaction (or potential transaction) involving a merger, acquisition, sale of shares or assets, financing, consolidation, reorganization, divestiture, or dissolution of all or a portion of our business (including in connection with a bankruptcy or similar proceedings).

## **4. 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. 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.

## **6. International transfers of personal information**

Pinsight is based in the United States, and we have service providers in the United States and potentially other countries. Your personal information may be collected, used, and stored in these countries or other locations outside of your home country. Privacy laws in the locations where we handle your personal information may not be as protective as the privacy laws in your home country. By providing your personal information, where applicable law permits, you specifically and expressly consent to such transfer and processing and the collection, use, and disclosure set forth herein.

Users located in Europe can view more information about cross-border transfers in the section below titled “Notice to European Users.”

## **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 Pinsight 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.

### ***Opt out of text messages***

We may offer communications via text messages sent by Pinsight or any of our service providers, such as for customer service and account-related purposes. To stop receiving text messages from us, reply STOP to any text message you receive from us, or send your request and mobile telephone number to the email address listed at the end of this Privacy Policy. Note that we may send you a message to confirm receipt of your STOP request.

notifications can be configured in settings on your mobile device.

### ***Cookies***

Most browsers let you remove and/or stop accepting cookies from the websites you visit. To do this, follow the instructions in your browser's settings. Many browsers accept cookies by default until you change your settings. If you do not accept cookies, however, you may not be able to use all functionality of the Services and our websites may not work properly. For more information about cookies, including how to see what cookies have been set on your browser and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

### ***Advertising Choices***

You can limit the use of your information for interest-based advertising by blocking third-party cookies in your browser settings, using browser plug-ins/extensions, and/or using your mobile device settings to limit the use of the advertising ID associated with your mobile device. You can also opt out of interest-based ads from companies participating in the following industry opt-out programs by visiting the linked websites: the Network Advertising Initiative ([http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp)) and the Digital Advertising Alliance (<https://optout.aboutads.info>). Some of the companies we work with may offer their own opt-out

mechanisms. For example, you can learn more about how Google uses cookies for advertising purposes by clicking [here](#) and opt-out of ad personalization by Google by clicking [here](#).

Many of the opt-out preferences described in this section must be set on each device and/or browser for which you want them to apply. Please note that some of the advertising companies we work with may not participate in the opt-out mechanisms described above, so even after opting-out, you may still receive interest-based advertisements from other companies. If you opt-out of interest-based advertisements, you will still see advertisements online but they may be less relevant to you.

## 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. Notice to European Users

The information provided in this section applies only to individuals in the European Economic Area and the United Kingdom (collectively, “**Europe**”). Except as otherwise specified, references to “personal information” in this Privacy Policy are equivalent to “personal data” governed by European data protection legislation.

### ***Controller***

The controller of your personal information covered by this Privacy Policy for purposes of European data protection legislation is Global Assessor Pool LLC d/b/a/ Pinsight, 2301 Blake St, Denver CO 80205 USA.

### ***Legal Bases for Processing***

The legal bases of our processing of your personal information as described in this Privacy Policy will depend on the type of personal information and the specific context in which we process it. However, the legal bases we typically rely on are set out in the table below. We rely on our legitimate interests as our legal basis only where those interests are not overridden by the impact on you (unless we have your consent, or our processing is otherwise required or permitted by law). If you have questions about the legal basis of how we process your personal information, contact us using the information at the bottom of this Privacy Policy.

<b>Processing Purpose</b> (as described above in the “How we use	<b>Legal Basis</b>
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information we collect” section)	
<b>To provide our services and communicate with you</b>	Processing is necessary to perform the contract governing our operation of the Services, or to take steps that you request prior to engaging our products or services. Where we cannot process your personal information as required to operate the Services on the grounds of contractual necessity, we process your personal information for this purpose based on our legitimate interests as further described in this Privacy Policy.
<b>For research and development</b>	Processing is based on our legitimate interests in performing research and development as described in this Privacy Policy.
<b>To comply with law</b>	Processing is necessary to comply with our legal obligations.
<b>Direct marketing</b>	Processing is based on your consent where that consent is required by applicable law. Where we rely on your consent you have the right to withdraw it any time in the manner indicated when you consented or via the relevant Services.
<b>Interest-based advertising</b>	Where such consent is not required by applicable law, we process your personal information for this purpose based on our legitimate interests in promoting our business and providing you with tailored, relevant content.
<b>For compliance, fraud prevention, and safety</b>	Processing is necessary to comply with our legal obligations or based on our legitimate interests in protecting our or others’ rights, privacy, safety, or property.
<b>With your consent</b>	Processing is based on your consent. Where we rely on your consent you have the right to withdraw it any time in the manner indicated when you consent or via the relevant Services.

### ***Use for New Purposes***

We may use your personal information for reasons not described in this Privacy Policy where permitted by law and the reason is compatible with the purpose for which we collected it. If we need to use your personal information for an unrelated purpose, we will notify you and explain the applicable legal basis.

### ***Your Rights***

European data protection laws may give you certain rights regarding your personal information. You may ask us to take the following actions in relation to your personal information that we hold:

- **Access.** Provide you with information about our processing of your personal information and give you access to your personal information.
- **Correct.** Update or correct inaccuracies in your personal information.
- **Delete.** Delete your personal information.
- **Port.** Transfer a machine-readable copy of your personal information to you or a third party of your choice.
- **Restrict.** Restrict the processing of your personal information.
- **Object.** Object to our reliance on our legitimate interests as the basis of our processing of your personal information that impacts your rights.

You may submit these requests by contacting us at [dpo@pinsight.com](mailto:dpo@pinsight.com). We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions. If you would like to submit a complaint about our use of your personal information or our response to your requests regarding your personal information, you may contact us or submit a complaint to the data protection regulator in your jurisdiction. In the European Economic Area, you can find your data protection regulator [here](#). In the United Kingdom, you can find your data protection regulator [here](#).

### ***Cross-Border Data Transfer***

If we transfer your personal information to a country outside of Europe such that we are required to apply additional safeguards to your personal information under European data protection laws, we will do so. Please contact us using the contact details below for further information about any such transfers or the specific safeguards applied.

## **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, 2301 Blake Street, Denver, CO 80205, (800) 423-8295