

# CEO of You™

## Women's Leadership and Mentoring Program

### Privacy Policy Information Form

This is the Privacy Policy for Cullum Business Solutions, LLC sponsor of the **CEO of You™** program.

#### **Introduction**

Cullum Business Solutions, LLC ("CBS") is committed to respecting and protecting the privacy of our constituents. CBS subscribes to the American Psychological Association's code of ethics regarding the use of an individual's personal data for research; this code is particularly concerned with protecting the rights of the person. Furthermore, CBS is committed to acting in compliance with current data protection legislation including the European Union's General Data Protection Regulation (EU) 2016/ 679 (GDPR).

CBS is based in the United States and maintains its servers in the United States. If you are visiting from the regions outside the United States with laws governing data collection and use, please note that by using our site and services your personal information will be transferred to the United States for processing.

This Privacy Policy sets out how we handle data, including how we collect, store and use personal data, our legal basis for processing your personal data, information on transfers to third parties and international transfers, as well as your rights as a data subject. This version has been updated to reflect the strengthened rights of individuals under GDPR, to make it easier to understand and to provide more fairness and transparency to you by making additional information available.

#### **1. Who we are and other important information**

To provide its leadership and research products and services, CBS collects and processes personal data. This Privacy Policy sets out how we collect and process personal data through use of our products and services, use of our website, completion of our psychometric assessments, and other collection of personal data related to our business as provider of leadership and research services.

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This Privacy Policy also covers all the entities and branch offices of CBS. When we refer to “we,” “us,” and “our” we mean CBS, our branch offices, and entities, as the controller or processor of data, as applicable.

### **2. What personal data do we collect and how do we use it?**

#### **2.1 When visiting our internet sites**

If you visit our internet sites, we automatically collect the related session data. Session data is provided to us by your browser, by third-party integrations on our sites, and through our log files, which record your activities while browsing our sites, such as when you click on a link. We may record some of this data in one or more cookies that we send to your browser.

Simply visiting CBS's websites does not require you to submit personal data (although our cookies may collect certain personal data for statistical and analytical purposes). If, however, you ask us for information, register with us, sign up to attend any of our events or receive our marketing material, or otherwise express an interest in our products or services or report a problem, we collect any personal data submitted to us at that time.

This site makes chat rooms, forums, message boards, and/or news groups available to some of its users. Users should exercise caution when deciding to disclose personal information and photos in public forums. To request removal of personal information from CBS's blog or community forum, contact CBS at [princess@ceofuinc.com](mailto:princess@ceofuinc.com). In any case where the removal of personal information is not possible, the requestor will be informed.

With their consent, CBS displays personal testimonials of satisfied customers on its site, in addition to other endorsements. With your consent, your testimonial along with your name and photo may be posted. Any client or data subject wishing to update or delete a testimonial should contact [princess@ceofuinc.com](mailto:princess@ceofuinc.com).

CBS uses Google Analytics to track how often people gain access to or read our content. We use this information in the aggregate to understand what content our members find useful or interesting, so we can produce the most valuable content to meet your needs. The information generated by the cookie about your use of the website (including your IP address) will be

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transmitted to and stored by Google on servers in the United States. Google will use this information for the purposes of evaluating your use of the website, compiling reports on website activity for website operators, and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser; however, please note that if you do this you may not be able to use the full functionality of this website. By using the CBS website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

When you visit our websites and access resources on our websites, we may automatically collect technical data and usage data. We collect this data via cookies including, where available, your IP address, operating system and browser type, for system administration.

### **2.2 When making a purchase from our website or bookstore**

CBS collects users' contact information (such as name and email address) and financial information (such as account or credit card number). CBS uses contact information from the order form to send orders to its customers. Contact information is also used to get in touch with customers when necessary.

### **2.3 When registering or creating an account**

If you register or create an account, we require that you provide certain personal information during account registration. We collect your name, contact information, and other information, and may ask you for other optional information that helps us serve you better.

You may wish to subscribe to the CBS's publications without attending a program. For instance, you may sign up to receive CBS's newsletters even though you are not a CBS participant. To receive CBS newsletters by email, you will be asked to provide CBS with a valid email address.

CBS does not share this information with any third party other than to store the information in our cloud-hosted databases. We rely on a contract basis to process your personal information for

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purposes of fulfilling your request to receive our publications. You may, at your own option, choose to subscribe to CBS news and updates, which may be considered direct marketing.

You may manage your CBS subscriptions by subscribing or unsubscribing at any time. Please visit [CEOofuinc.com](http://CEOofuinc.com) to request to be deleted from our distribution lists.

### **2.4 When attending a program or completing an assessment**

If a participant completes an assessment, we collect the participant's name, email address, contact information, assessment responses, session data, and other information you may choose to provide or associate with your account. In some cases, we ask questions to which the response is optional (such as demographic questions), and these questions are identified as such. In some instances, these optional demographic questions may involve collection of special categories of personal information, such as information regarding your racial or ethnic origin. You are free not to respond to these optional questions. For processing involving special categories of data, our legal basis for processing is your explicit, informed consent, which will be asked separately.

Data will be collected directly from you when you complete an assessment questionnaire via CBS platforms or otherwise. Where feedback is given and/ or where you participate in an assessment or leadership program or other engagement run by CBS, additional data to that set out above may be provided by you to the mentor and/peer group or our delivery team respectively, at the time of such feedback, assessment, or engagement.

### **2.5 When you choose to participate in research**

As part of its activities, CBS also conducts original scientific research in the field of leadership development. Since the organizations and people who participate in our training programs and other activities represent valuable sources for research data, the information collected from them is securely stored in CBS databases and may become a part of a research project. CBS has a strong commitment to protect the rights, privacy, and dignity of every person who participates in these activities. For this reason, there are a number of safeguards in place:

- CBS is guided by the American Psychological Association's code of ethics regarding the use of an individual's personal data for research; this code is particularly concerned with protecting the rights of the person.

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- All data utilized for research is obtained following the informed and/or explicit consent of the individual participant.
- Questions related to race/ethnicity or family history are for U.S. research and reporting purposes. U.S. law encourages us to collect information on the racial demographics of our clients. Other legal jurisdictions outside of the United States may not permit the collection of such information. Therefore, answer race/ethnicity or family history questions only if you reside in the United States.
- Assessment data collected about or from an individual as part of a leadership development activity are shared with and explained to that individual.
- Information collected about or from an individual is considered confidential. Individuals receive feedback on assessments only from qualified Feedback Coaches. Any further disclosure or sharing shall be possible only pending the individual's consent.
- Although CBS has never been required to release information without an individual's permission (or the permission of an authorized legal representative such as an executor, executrix, or the holder of a valid power of attorney), it is acknowledged that in the extremely rare case of a court order, CBS might be compelled to do so.
- Data collected from surveys published by CBS are stored in its secure database. They become a part of the norm group, containing thousands of scores, against which individual scores are calibrated. Periodically, CBS publishes data on groups of people. Individuals are never identified in these reports. Specific organizations are identified only if prior written approval is received from the organization. CBS may also provide organization summary profiles on groups of individuals in that organization if the number of individuals is large enough to be potentially meaningful.
- If it is desired, response data can be removed from CBS's research database. Send an email to [princess@ceofuinc.com](mailto:princess@ceofuinc.com) requesting that your data be removed. Once the data is removed, CBS will not be able to provide a duplicate feedback report at a later date or use that data in any group profiles.

### **2.6 When you choose to participate in a survey**

From time to time, CBS may post online surveys to ask visitors for opinions on leadership, CBS services, or visitors' needs. This information will be used internally to provide better service to CBS clients. Any customer contact information collected would only be used to contact the visitor if necessary. Demographic and profile data may also be collected as the need arises, and would be used for internal reporting only.

If you choose to participate in one of our surveys, we may collect personal information such as your name, email address, and any other personal information that you may provide in your survey responses. Participation in surveys is optional, and we give you the ability to opt out of being contacted for surveys at any time.

### **2.7 When you choose to receive marketing communications**

If you sign up to receive our marketing communications, we may collect information on the open

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rate of the communications, and whether a specific individual has clicked on a link contained in a particular communication.

### **2.8 When you are a customer or other business contact**

If you are a customer or other business contact, or if you are an employee or agent of a customer or business contact, we may collect your name, email address, telephone number, and other contact information in the regular course of our interaction with you.

Data will be collected:

- Prior to, at commencement, and during the term of a contractual relationship when you request our products and services
- When you complete forms on our site or for our products and services, including registering to use our site, subscribing to our services, posting material, or using further services
- When you enter a contest or promotion sponsored by us
- When you contact us or report a problem to us, or provide feedback to us, or complete a survey
- When you transact with us through our website or when you place orders with us over the phone or by email

### **2.11 When you fail to provide personal data**

Where we need to collect personal data by law or under the terms of a contractual arrangement, and you fail to provide that data when requested as being mandatory, we may not be able to fulfil the terms of the contract or relationship that we have with you.

## **3. How and why we use your personal data**

This section explains how we use your personal data and how you may opt out of marketing communications and how you can manage cookies. It includes the legal basis on which we rely to process your data.

### **3.1 Customers and suppliers (including individual contractors) and other business contacts**

#### **3.1.1 Personal data of customers (including identity, contact, technical, usage, and profile data) will be used**

- To provide you with products and services that you request from us
- To manage our contractual relationship on an ongoing basis

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- For customer administration including carrying out our obligations arising from any contracts entered into between you and us and including retention of correspondence if you contact us
- For us to form a view on what we think you may want or need, or what products, services, or offers may be of interest to you (referred to as marketing) in order to provide you with information about our other products and services in which you may be interested, including our catalogue and our regular newsletter, and, where relevant, information on organizations that are authorized to offer CBS products and services, where you have not opted out to be contacted for such purposes
- To personalize our service to you, including ensuring that content from our site is presented in the most effective manner for you and your computer
- To seek your views on products and services
- To enable you to participate in interactive features of our service, when you choose to do so, including live chat features
- For technical administration of our sites, including notifying you about changes to our service
- With further information on our products and services

### **3.1.2 Personal data of suppliers and other business contacts (including identity, contact, technical, usage, and profile data) will be used**

- To receive products and services
- To manage our contractual relationship on an ongoing basis
- For supplier administration, including carrying out our obligations arising from any contracts entered into between you and us and including retention of correspondence if you contact us
- To provide updates and news about our products and services, as such may be relevant to the services you provide.

You will receive marketing communications from us if you have requested such communication, purchased products or services, or if you provided us or one of our service providers with your details and have not opted out of receiving marketing communications. Where you opt out of receiving marketing messages, we may need to communicate with you for administrative or operational reasons; therefore, while you use our products and services and continue to wish to do so, it is not possible to opt out of all communications with us, and therefore an opt out may not apply to personal data provided to us as a result of purchase of products or services or other associated activities or transactions.

### **3.2 Participants**

Personal data collected from participants taking our assessment questionnaires will be used:

- We may combine participant data with that of other participants (for example, to create aggregated team reports).
- Where you participate in an assessment or leadership program or other consultancy engagement run by our leadership team, additional data provided by you may be used for the purposes of provision of our services
- For research and product development purposes. Such data is collected through completion of our assessment questionnaires, including via online platforms or otherwise, for research

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and product development purposes in order to produce statistics of the type described in our product manuals, e.g. psychometric norms and validated data. You may be asked, as part of the testing process, to give your consent to the use of your personal data for research and product development purposes, and to answer additional optional research questions. If you decline from doing so, no data is collected or used for research and product development purposes.

If you agree to it, you will be asked to give your consent for the processing for research purposes as well as for the processing of all or any special categories of personal data where applicable.

### **3.3 Visitors to the CBS website**

Personal data (including identity, contact, technical and usage data) will be used to form a view on what we think you may want or need, or what products, services, or offers may be of interest to you (referred to as marketing) in order to provide you with further information on our products and services. You will receive marketing communications from us if you have requested information from us or if you provided us or one of our service providers with your details and, in each case, you have not opted out of receiving marketing. Where you opt-out of receiving marketing messages, this will not apply to personal data provided subsequently if you then choose to purchase products or services, and in relation to other subsequent associated activities or transactions.

### **3.4 Aggregated data**

We also use aggregated data, including cookies data ([see our Cookie Policy](#)) and respondent data taken from the respondent responses to our assessments, and from the optional question responses completed prior to taking the questionnaires, for the purposes of research and product development. Aggregated data used within our research and product development functions is derived from your personal data, but no personal data will be published or disclosed, since it is aggregated and anonymized for the purposes of research and product development and therefore no person is identified or identifiable from such data.

## **4. Who we transfer your personal data to**

We may have to share your personal data with third parties for processing or sub-processing purposes. We undertake a selection process and periodic review in relation to processors and sub-processors. We enter into data processing agreements with both processors and controllers, as applicable.

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CBS does not rent or sell information to any outside organizations. CBS will share your personal information with third parties only in the ways that are described in this privacy policy. CBS also limits the information it collects to the minimum necessary to provide outstanding service, such as providing customer support or offering key products and services. All financial information given to CBS is kept secure. CBS has partnerships with third parties where basic contact information and data are shared to deliver contracted services and research with CBS clients. These companies are authorized to use your personal information only as necessary to provide these services to us.

### **5. CBS may also disclose personal information:**

- a. As required by law, such as to comply with a subpoena or similar legal process
- b. When it is believed in good faith that disclosure is necessary to protect our rights, protect others' safety, investigate fraud, or respond to a government request
- c. If CBS is involved in a merger, acquisition, or sale of all or a portion of its assets, users will be notified via email and/or a prominent notice on our website of any change in ownership or uses of personal information, as well as any choices users may have regarding their personal information
- d. To any other third party for whom users or clients have given prior consent

### **6. How we keep your data secure**

We are committed to ensuring the security of processing and the ongoing confidentiality, integrity, availability, and resilience of systems and services, as such relate to personal data that we hold, in order to prevent accidental or unlawful destruction, loss, alteration, or unauthorized disclosure or access.

In our roles as both controller and processor, we implement appropriate technical and organizational measures to ensure a level of information security appropriate to the risk. Our IT infrastructure and software applications are built to provide secure deployment of services, encrypted storage of back-up data with end-user privacy safeguards, encrypted communications between services, and safe operation by customers.

Our staff, associates, and consultants are bound to comply with confidentiality provisions and our privacy policy, in addition to completing mandatory data protection training. We have various policies that specifically address responsibilities and expected behavior with respect to the protection of confidential information.

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We have procedures for incident and breach investigation and notification. Where our assessment of the likely risk to the individuals involved concludes that a breach of personal data may result in a high risk to the rights and freedoms of individuals, we shall promptly inform individuals (and associated controllers and the relevant supervisory authority where applicable) of any such breach, as required by law and in accordance with any contractual terms.

Where we have given you (or where you have chosen) a username and/or password which enables you to access certain parts of our websites, or use our products and services, you are responsible for keeping the username and password confidential. You should not share these details with anyone.

### **7. Data retention**

We will retain your personal information on our systems only for as long as we need it, given the purposes for which it was collected, or as required to do so by law. CBS will retain and use this personal information as necessary to comply with legal obligations, resolve disputes, and enforce our agreements.

### **8. Your legal rights**

#### **8.1 Request access to your personal data**

(Commonly known as a “subject access request” or “SAR”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

#### **8.2 Request rectification of the personal data that we hold about you**

This enables you to have any incomplete or inaccurate data we hold about you rectified, though we may need to verify the accuracy of the new data you provide to us.

#### **8.3 Request erasure of your personal data**

This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully, or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

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### **8.4 Object to processing of your personal data**

This enables you to object to processing where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

### **8.5 Request restriction of processing of your personal data**

This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise, or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

### **8.6 Withdraw consent**

You may withdraw consent at any time where we are relying on consent as the legal basis on which we process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdrew your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Where we are a processor in respect of your personal data, we will inform the relevant controller of your request and assist and co-operate with the controller for them to fulfil the request.

### **8.7 Further information**

We may need to request specific information from you to help us confirm your identity or verify your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

## **9. Exercising your rights**

An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data, should direct his query to us and/or the Data Controller. If the Client requests CBS to remove the data, a response will be provided within one month of their request.

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### **10. How you can contact us**

If you have a question about our processing or would like to exercise one of your rights set out above do not hesitate to contact us by email ([princess@ceofuinc.com](mailto:princess@ceofuinc.com)). When you send us an application relating to your rights, please provide us with your full contact details (name, surname, email address[es], full postal address). Also, note CBS's contact address in the USA:

Cullum Business Solutions, LLC  
10115 Paxton Run Road  
Charlotte, NC 28277

### **11. Governing law**

Without prejudice to the application of European or national data protection laws and regulations, the laws of the State of North Carolina and as applicable, those of the United States of America, govern the use of the CBS Services. All claims brought in the United States will be subject to the jurisdiction of the courts of the State of North Carolina, without prejudice to your right to lodge a complaint with a competent data protection authority or with a competent court in the European Union for data protection-related matters.

### **12. Status of this Privacy Policy and changes**

CBS may update this privacy policy to reflect changes to our information practices. If any material changes are made, users will be notified by email (sent to the e-mail address specified in their account) or by means of a notice on this Site prior to the change becoming effective. Users are encouraged to periodically review this page for the latest information on CBS's privacy practices.