

PRIVACY POLICY

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 website, located at <http://www.pinsight.com> and use of our related services (including any web or mobile applications). By submitting information through our website or through our related services, you agree to the terms of this Privacy Policy and you expressly consent to the processing of your information in accordance with this Privacy Policy.

1. TYPES OF INFORMATION WE COLLECT.

1.1 Information You Provide Us Directly: We may collect information from you, such as your first and last name, gender, e-mail and mailing addresses, occupation, industry, registration data, and password when you create an account to log in to our network. We may also collect information from you when registering to participate in or use our services, taking online assessment questions, providing information about other assessment participants, providing information about yourself and others to our staff or when you contact us via e-mail or postal mail. If you take an assessment, we will retain and evaluate all information provided by you in connection with the assessment, including without limitation profile pictures, any role play responses, questions and answers, data, results, or similar information (the “Assessment Information”). We also retain information that you post or store through your account and/or on our website, including without limitation, a resume, employment history, education, professional credentials, membership in professional organizations, skills, citizenship, work status, and references. If you exchange any messages through our site or service, we may store those as well. If you provide us feedback or contact us via e-mail, we will collect your name and e-mail address, as well as any other content included in the e-mail, in order to send you a reply, and any information that you submit to us, such as a resume. When you post messages on the message boards of our website or on our blog, the information contained in your posting will be stored on our servers and other users will be able to see it. We may also retain any messages you send through the service, and may collect information you post to the service.

1.2 Information We May Receive From Third Parties: We may receive information about you from third parties. This information could include, but is not limited to, information provided by a past, current, or potential employer or your references.

2. Information Collected via Technology. 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 from you, including browser type, operating system, Internet Protocol (IP) address (a number that is automatically assigned to your computer when you use the Internet, which may vary from session to session), domain name, and/or a date/time stamp for your visit. We also use Cookies (as defined below) and navigational data to gather information regarding the date and time and duration of your visit and the solutions and information for which you searched and which you viewed. This information includes, without limitation, characters you type, your search and browsing history, articles you click, and pages you view. 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. **“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. We use Google Analytics on our site. Google Analytics is a web analytics service provided by Google. Google Analytics uses cookies to collect anonymous traffic data to help use analyze how users use the website. The information generated by a cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the site, compiling reports on site activity for us and providing other services relating to site 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. By using the website, you consent to the processing of data about you by Google in the manner and for the purposes described in this Privacy Policy.

We do not respond to browser-based "do not track" signals. However, some third party sites who push consent to our site do keep track of your browsing activities over time and across different websites when they serve you content, which enables them to tailor what they present to you.

3. USE OF YOUR DATA

3.1 General Use. In general, information you submit to us is used either to respond to requests that you make, or to aid us in serving you better. Company uses your information for research and marketing purposes; to facilitate the creation of and secure your account on our network; identify you as a user in our system; provide improved administration of our website and services; improve the quality of experience when you interact with our website and services; send you administrative e-mail notifications; respond to your inquiries related to employment opportunities or other requests; send promotional communications; send upgrades and special offers related to our services and for other

marketing purposes of Company (or our partners should you opt-in to receive such communications by following the instructions we provide); make telephone calls to you, from time to time, as a part of secondary fraud protection or to solicit your feedback. We use your Assessment Information to prepare reports for your employer or commissioning company and for your development.

3.2 Creation of Anonymous Data. We may create anonymous data records from information 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 so that we may enhance the content of our services and improve site navigation. Company reserves the right to use and disclose anonymous data to third party companies for any purpose in its discretion. We may also use anonymous data for research purposes, such as scientific articles and presentations and other publications and to enhance our services.

3.3 Feedback. If you provide feedback on any of our services to us, we may use such feedback for any purpose, provided we will not associate such feedback with your information. Company will collect any information contained in such communication and will treat the information in such communication in accordance with this Privacy Policy and Terms of Use.

4. DISCLOSURE OF YOUR INFORMATION

4.1 Affiliates. Although we currently do not have a parent company, any subsidiaries, joint ventures, or other companies under a common control (collectively, “**Affiliates**”), we may in the future. We may share some or all of your information with these Affiliates, in which case we will require our Affiliates to honor this Privacy Policy. If another company acquires our company or our assets, that company will possess the information collected by it and us and will assume the rights and obligations regarding your information as described in this Privacy Policy.

4.2 Other Disclosures. Regardless of any choices you make regarding your information (as described below), Company may disclose information if it believes in good faith that such disclosure is necessary to (a) comply with relevant laws or to respond to subpoenas or warrants served on Company; or (b) protect or defend the rights or property of Company or users of the services.

4.3 Third Parties. We may receive information about you from other sources like telephone or fax, from colleagues who refer you to us, current, past or potential employers, or otherwise. We may add this information to the information we have already collected from you via our website in order to improve the services we provide.

4.4 Service Providers. Except as otherwise stated in this policy, we do not generally sell, trade, share, or rent the information collected from our services to other entities. However, we may share

your information with third party service providers and partners to provide you with the services that we offer you through our website; to conduct quality assurance testing; to facilitate creation of accounts; to process any transactions you make through our website, or to provide technical support. These third party service providers are required not to use your information other than to provide the services requested by Company. You expressly consent to the sharing of your information with our contractors and other service providers for the sole purpose of providing services to you.

4.5 Clients. In the course of our services, we may disclose your personal information, including Assessment Information, to clients who have engaged our services. We disclose Assessment Information and other information to the employer/client that has engaged us and to designated client personnel. Assessment Information and other personal information collected by our consultants or provided by our client may be maintained at a client site or in our database, to which our client, and certain personnel designated by our client, will have access both during and after the conclusion of our assignment. In the course of our services, we may provide personal information regarding candidates, including the results of assessments taken through our services and related data, to prospective or current employers that have engaged us, or to reference sources.

4.6 Third Party Links and Websites. Our provision of a link to any other website or location is for your convenience and does not signify our endorsement of such other website or location or its contents. When you click on such 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 such outside websites.

5. YOUR CHOICES REGARDING YOUR INFORMATION

5.1 Choices. We offer you choices regarding the collection, use, and sharing of your information. We will periodically send you free newsletters and e-mails that directly promote the use of our site or services and may contain advertisements for our partners. When you receive newsletters or promotional communications from us, you may indicate a preference to stop receiving further communications from us and you will have the opportunity to “opt-out” by following the unsubscribe instructions provided in the e-mail you receive or by contacting us directly (please see contact information below). Should you decide to opt-out of receiving future mailings, we may share your e-mail address with third parties to notify them that you do not receive further communications from third parties. Despite your indicated e-mail preferences, we may send you emails related to your account or transactions thereunder, or notices of any updates to our Terms of Use or Privacy Policy. Unless you purchase an assessment for your own personal use (and not in connection with any request by a current or potential

employer) you shall not have any right to receive a copy of any information provided by you to us in connection with an evaluation or assessment, including without limitation any Assessment Information.

5.2 Changes to information. You may change any of your information in your account by sending an e-mail to us at the e-mail address set forth below. 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.

6. SECURITY OF YOUR INFORMATION. We are committed to protecting the security of your information. 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 Company cannot fully eliminate security risks associated with information and mistakes may happen.

7. DISPUTE RESOLUTION. If you have any questions or concerns, please contact Company by e-mail at info@pinsight.com. We will do our best to address your concerns. If you feel that your complaint has been addressed incompletely, we invite you to let us know for further investigation. Except as set forth in section 12, if you and Company are unable to reach a resolution to the dispute, you and Company will settle the dispute exclusively under the rules of the American Arbitration Association (www.adr.org) as set forth in the Terms of Use.

8. A NOTE 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.

9. A NOTE TO USERS OUTSIDE OF THE UNITED STATES. Your information may be processed in the country in which it was collected and in other countries, including the United States, where laws regarding processing of information may be less stringent than the laws in your country.

10. CHANGES TO THIS PRIVACY POLICY. This Privacy Policy is subject to occasional revision, and 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. Any material changes to this Privacy Policy will be effective upon the earlier of thirty (30) calendar days following our dispatch of an e-mail notice to you or thirty (30) calendar days following our posting of notice of the changes on our site. These changes will be effective immediately for new users of our website or services. Please note that at all times you are responsible for updating your information

to provide us with your most current e-mail address. In any event, changes to this Privacy Policy may affect our use of information that you provided us prior to our notification to you of the changes. If you do not wish to permit changes in our use of your information, you must notify us prior to the effective date of the changes that you wish to deactivate your account with us. Continued use of our website, or services, following notice of such changes shall indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes.

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

12. PRIVACY SHIELD. Company complies with the US-EU Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from individual customers in the European Union member countries. Company's participation in the Privacy Shield applies to all personal data that is subject to this policy and is received from the European Union and the European Economic Area. Company is responsible for the processing of such personal data it receives under the Privacy Shield Framework and subsequent transfers to a third party acting as an agent on its behalf. In particular, Company remains responsible and liable under the Privacy Shield Principles if third-party agents that it engages to process the personal data on its behalf do so in a manner inconsistent with the Principles, unless Company proves that it is not responsible for the event giving rise to the damage. Company has certified that it adheres to the Privacy Shield Principles of notice, choice, and accountability for onward transfer, security, data integrity and purpose limitation, access, recourse, enforcement and liability. If there is any conflict between the policies 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 page, please visit <https://www.privacyshield.gov>. The Federal Trade Commission (FTC) has jurisdiction over Company's compliance with the Privacy Shield. In compliance with the US-EU Privacy Shield Principles, Company commits to resolve complaints about your privacy and our collection or use of your personal information. EU individuals with questions or concerns about the use of their Personal Data should contact us at info@pinsight.com. For any complaints that cannot be resolved with Company directly, Company has chosen to cooperate with EU data protection authorities (DPAs) and comply with the information and advice provided to it by an informal panel of DPAs in relation to such unresolved complaints (as further described in the Privacy Shield Principles). Please contact us to be directed to the relevant DPA contacts. As further explained in the Privacy Shield Principles, a binding arbitration option will also be made available to you in order to address residual complaints not resolved by any other means. Company commits to cooperate with EU data protection authorities (DPAs) and comply with the advice given by such authorities.