

ADDITIONAL INFORMATION FOR EUROPEAN UNION USERS

If you reside in a country in the European Economic Area, the United Kingdom, or in Switzerland (a “European Resident”), then information we collect from you may be subject to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the “GDPR”), and the following additional information is provided for your benefit.

The controller of the Personal Information collected through the Services is your employer or the other entity on whose behalf you are accessing our Website or using our Services.

The processor of your Personal Information is:

Leadership Solutions, Inc.
200 S. Broad Street (The Bellevue)
Suite 405
Philadelphia, PA 19102

References to “Personal Information” in this Additional Information For European Union Users section are equivalent to “personal data” governed by European data protection legislation. If you use the Services, you acknowledge that your Personal Information is being processed pursuant to the lawful bases described below, and you specifically consent to your Personal Information gathered through the Services being transferred to, used, and stored in the United States.

Legal bases for processing

We only use your Personal Information as permitted by law. We are required to inform you of the legal bases of our processing of your Personal Information, which are described in the table below. If you have questions about the legal basis of how we process your Personal Information, contact us at info@leadership-solutions.com.

Processing purpose (reference applicable section in this Privacy Policy for details)	Legal basis
To provide the Services	You have entered a contract with us and we need to use your Personal Information to provide services you have requested or take steps that you request prior to providing services.
To send you marketing communications; For security compliance; fraud prevention and safety; to prosecute or defend legal claims; to deliver advisements.	These processing activities constitute our legitimate interests. We consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Information for our legitimate interests. We do not use your Personal Information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You have the right to object to, and seek restriction of, such processing; to exercise your rights, please email us at info@leadership-solutions.com .
For compliance with law	Processing is necessary to comply with our legal obligations.

With your consent	Processing is based on your consent. Where we rely on your consent you have the right to withdraw it anytime in the manner indicated in the Services or by contacting us at info@leadership-solutions.com .
-------------------	--

Disclosures of Your Information

We also reserve the right to disclose your Personal Information, (as well as Other Information, without the same restrictions that apply to your Personal Information) to our service providers who we may engage from time to time to perform certain functions on our behalf (such as processing of payments, provision of data storage, hosting of our website, marketing of our products and services, conducting audits, and performing web analytics) (collectively, the “Subprocessors”). To the extent we engage any Subprocessors who will process your Personal Information, we will update this Privacy Policy to identify such Subprocessors, and we will establish data processing agreements that govern our Subprocessors’ use of your Personal Information, but you acknowledge that any Subprocessors use of your Personal Information may also be subject to the Processors’ own privacy policies.

Retention

We will only retain your personal information for as long as necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

Your rights

European data protection laws 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:

- **Opt-out.** Stop sending you direct marketing communications. You may continue to receive Services-related and other non-marketing communications.
- **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.
- **Transfer.** 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 can submit these requests by email to info@leadership-solutions.com or our postal address provided above. 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 response to your requests regarding your personal information, you may contact us or submit a complaint to the data protection regulator in your jurisdiction. You can find your data protection regulator at http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm.

Cross-Border Transfer

The Services are controlled and operated by us from the United States and are not intended to subject us to the laws or jurisdiction of any state, country or territory other than that of the United States. Your personal information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using the Services you consent to the transfer of information to countries outside of your country of residence, including the United States. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your personal information.

Questions and Complaints

If you have any questions or complaints regarding our use of your personal information, please contact us at info@leadership-solutions.com. You also have the right to submit a complaint to your applicable Data Protection Authority.