

1. LEADERSHIP SOLUTIONS - WEBSITE PRIVACY POLICY

Effective as of September 1, 2021

LEADERSHIP SOLUTIONS, INC. (“LSI”, “we” or “our”) is concerned about privacy issues and wants you to be familiar with how we collect, use, and disclose information. This Privacy Policy describes our practices in connection with how we collect, use and share your information if you visit leadership-solutions.com (“the Website”) to view information about our company and products, services, and sign up for an e-mail newsletter, as well as information of job applicants which we process on our clients’ behalf (collectively, the “Services”); and explains your choices for how we handle your personal information as well as through HTML-formatted email messages that we send to you that link to this Privacy Policy. By providing Personal Information (as defined herein) to us, you agree to the terms and conditions of this Privacy Policy.

If you have any questions or concerns about your Personal Information or this Privacy Policy, please contact us at info@leadership-solutions.com

Users in the European Economic Area, the United Kingdom, or Switzerland should be sure to read the important information provided in the Additional Information for European Union Users section of this Privacy Policy, available here:

<https://link.edgepilot.com/s/9d03ed3d/UEWa3zXaBUmBlDmVkpUQrQ?u=https://leadership-solutions.com/wp-content/uploads/2021/12/european-union-users.pdf>.

To the extent that there is a conflict between this Privacy Policy and the Additional Information for European Union Users, the Additional Information for European Union Users will prevail with respect to European Residents (as defined below) only.

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This Privacy Policy aims to give you information on how LSI collects and processes your Personal Information through your use of this Website, including any data you may provide through this Website.

We will post any modifications or changes to this Privacy Policy on this page.

2. **PERSONAL INFORMATION WE COLLECT**

We collect various types of personal information about you, as described below (collectively “Personal Information”, in the following ways:

Information you give us

Personal Information that you may provide through the Services or otherwise communicate with us includes:

- **Identity information**, such as your first name, last name, username or similar identifier, title or role, date of birth and gender;
- **Contact information**, such as your postal address, email address and telephone number;
- **Registration information**, such as your company name;
- **Feedback and correspondence**, such as information you provide when you send us a message, report a problem with Services, receive customer support or otherwise correspond with us;
- **Usage information**, such as information about how you use the Services and interact with us;
- **Marketing information**, such as your preferences for receiving marketing communications and details about how you engage with us; and
- **Employment application information**, such as your resume, LinkedIn profile, cover letter and online portfolio when applying for a job with one of our clients.

Information automatically collected

Our servers may automatically record certain information about how you use the Services, such as your Internet Protocol (IP) address, device and browser type, operating system, the pages or features of the Services that you browsed and the time spent on those pages or features, the

frequency with which you use the Services, search terms, the links that you click on or use, and other statistics. We collect this information in server logs and by using cookies and similar tracking technologies to analyze trends, administer the website, track users' movements around the website, gather demographic information about our user base as a whole, and deliver advertising. See our **Cookies and Similar Technologies Notice** in this Privacy Policy, for more information about how the Services and third-party analytics, advertising and social media companies use cookies and similar technologies to collect your information when you use the Services.

Sensitive Types of Personal Information

Subject to the following paragraph, we ask that you not send or disclose to us any sensitive types of Personal Information (including, without limitation, social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or union membership, and other types of information treated as "sensitive" or the equivalent under applicable laws) on or through the Services or otherwise.

If you send or disclose any sensitive types of Personal Information to us (such as when you submit user-generated content to the Services), you must consent to our processing and use of such sensitive Personal Information in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive Personal Information, you must not provide it to us.

Changes to your Personal Information

It is important that the Personal Information we hold about you is accurate and current. Please let us know if your Personal Information changes during your relationship with us by updating your registration profile or emailing us at info@leadership-solutions.com

3. HOW WE MAY USE YOUR PERSONAL INFORMATION

We may use Personal Information for the following purposes or as otherwise described to you at the time of collection:

To provide the Services

We use your Personal Information:

- to operate, maintain, administer and improve the Services;
- for our business purposes, such as data analysis, audits; developing new products; and operating, maintaining, administering, enhancing, improving or modifying our Services; identifying usage trends; determining the effectiveness of our promotional campaigns and operating and expanding our business activities.
- to manage and communicate with you regarding your Services, including by sending you Services announcements, technical notices, updates, security alerts, and support and administrative messages;

- to send administrative information to you, such as information regarding the Services and changes to our terms, conditions, and policies.
- to better understand your needs and interests, and personalize your experience with the Services; and
- to respond to your Services-related or employment-related requests, questions, and feedback.

To send you marketing communications

If you request information from us, use the Services or participate in our surveys, promotions or events, we may send you LSI-related marketing communications, which we believe may be of interest to you, as permitted by law but will provide you with the ability to opt out.

For security, compliance, fraud prevention and safety

We may use your Personal Information as we believe appropriate to (a) investigate or prevent violation of the law or our Terms of Services; (b) secure the Services; (c) protect our, your or others' rights, privacy, safety or property; (d) conduct monitoring and prevention activities; and (d) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.

For compliance with law; legal claims

We may use your Personal Information as we believe appropriate (a) under applicable law, including laws outside your country of residence; (b) to comply with applicable laws, lawful requests and legal process, such as to respond to subpoenas or requests from government authorities; (c) where permitted by law in connection with a legal investigation; (d) to enforce our terms and conditions; (e) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; (f) to prosecute or defend legal claims; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

With your consent

In some cases we may ask for your consent to collect, use or share your Personal Information, such as when you let us post your testimonials or endorsements in the Services.

4. HOW YOUR PERSONAL INFORMATION MAY BE DISCLOSED

We will never sell or rent your Personal Information, or share your Personal Information without your express consent, except as described in this Privacy Policy. We may disclose personal information to third parties as disclosed below:

- **Service Providers.** We may share your Personal Information with our third party service providers so that they may administer and provide the Services on our behalf, or provide other services such as marketing, billing, data analysis, customer service, email delivery, auditing, and other services.

- **Affiliates; Corporate Restructuring.** We may disclose your Personal Information to our subsidiaries and corporate affiliates for use consistent with this Privacy Policy. We may also disclose your Personal Information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar disclose your personal information as we believe necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with applicable laws, lawful requests and legal process, such as to respond to subpoenas or requests from government authorities; (c) where permitted by law in connection with a legal investigation; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; (g) to prosecute or defend legal claims; and (h) to allow us to pursue available remedies or limit the damages that we may sustain.
- **Compliance with Laws and Law Enforcement; Protection and Safety.** We may disclose your Personal Information as we believe appropriate to government or law enforcement officials or private parties (a) for the security, compliance, fraud prevention and safety purposes described above; (b) as required by law, lawful requests or legal process, such as to respond to subpoenas or requests from government authorities; (c) where permitted by law in connection with any legal investigation; and (d) to prosecute or defend legal claims.

5. OTHER INFORMATION

Other Information We May Collect

“Other Information” is any information that does not reveal your specific identity or does not directly relate to an individual, such as:

- Browser and device information
- Information collected through cookies, pixel tags and other technologies which is not connected to any Personal Information
- Demographic information
- Aggregated information

If we are required to treat Other Information as Personal Information under applicable law, then we may use it for the purposes for which we use and disclose Personal Information as detailed in this Policy.

How We May Collect Other Information

We and our third-party service providers may collect Other Information in a variety of ways, including automatically when you use our Services or visit the Website.

HOW WE MAY USE AND DISCLOSE OTHER INFORMATION

We may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. In some instances, we may combine Other Information with Personal Information. If we do, we will treat the combined information as Personal Information as long as it is combined.

THIRD PARTY SITES AND SERVICES

This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any site or service to which the Services link. The inclusion of a link on the Services does not imply endorsement of the linked site or service by us or by our affiliates.

6. SECURITY

We seek to use reasonable organizational, technical, and administrative measures to protect Personal Information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure and we cannot guarantee the security of your information.

7. INTERNATIONAL DATA USE

LSI is headquartered in the United States and has affiliates and service providers in other countries, and your personal information may be collected, used and stored in the United States 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.

European Union users should read the important information provided here <https://link.edgepilot.com/s/9d03ed3d/UEWa3zXaBUmBlDmVkpUQRQ?u=https://leadership-solutions.com/wp-content/uploads/2021/12/european-union-users.pdf> about transfer of personal information outside of the European Economic Area.

8. YOUR CHOICES AND ACCESS

Access, Update, Correct or Delete Your Information

We will use commercially reasonable efforts to allow all Website users who provide their Personal Information the opportunity to review, update, correct or delete the personal information they provided by contacting us at info@leadership-solutions.com. We reserve the right, in our sole discretion, to deny such requests where such requests are unduly burdensome, repetitive, or harassing.

Marketing communications

You may opt out of marketing-related emails by logging in and changing your account settings or by following the opt-out prompt in the email. You may continue to receive Services-related and other non-marketing emails.

Testimonials

If you gave us consent to post a testimonial to our site, but wish to update or delete it, please contact us at info@leadership-solutions.com.

Choosing not to share your Personal Information

If you do not provide information indicated as required or mandatory within the Services, or that is otherwise necessary to provide a requested service or feature within the Services, that portion or all of the Services may be unavailable to you.

9. Tracking

We may allow service providers and other third parties to use cookies and other tracking technologies to track your browsing activity over time and across the Services and third party websites. We also use third party website analytics services that help us analyze users' interactions with the Website. For more details, see the **Cookies and Similar Technologies Notice**. Some advertising networks allow you to opt out of targeted advertising. For more information, visit <http://www.aboutads.info/choices/> or <http://www.youronlinechoices.com>.

Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to do not track or similar signals. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

In some of our communications, we track clicks on links in the communications to content in the Services to help us measure the effectiveness of our communications.

10. Social Media Widgets

Our Services may include social media features and widgets, such as "like" button and "share this" button. These features may collect your personal information and track your use of the Services. These social media features are either hosted by a third party or hosted directly in the Services. Your interactions with these features are governed by the privacy policy of the company providing such functionality.

11. Third Party Sites and Services

The Services may contain links to other websites and services operated by third parties, such as social media platforms, advertising services and other websites and applications. These links are not an endorsement of, or representation that we are affiliated with, any third party. We do not control third-party websites, applications or services, and are not responsible for their actions. Other websites and services follow different rules regarding their collection, use and disclosure of your personal information. We encourage you to read their privacy policies to learn more.

12. USE OF SERVICES BY MINORS

The Website and Services are not directed to individuals under the age of thirteen (13), and we request that they not provide Personal Information through the Services. If we learn that any

user of the Services is under the age of 13, we will take appropriate steps to delete that individual's personal information and restrict that individual from future access to the Services.

14. YOUR CALIFORNIA PRIVACY RIGHTS

You may have heard of the California Privacy Protection Act which provides certain rights to California (CCPA) residents in connection with their Personal Information. Our Services are not currently subject to the CCPA. However, we do provide notice and transparency about our collection and use of Personal Information as described in Privacy Policy.

15. Residents of Canada

If you have an objection to the use of your Personal Information as described in this Privacy Policy, you may file a complaint by sending an email to info@leadership-solutions.com. We will attempt to accommodate your objection or complaint, but you understand that, to the extent you object to our processing of Personal Information that is necessary for us to provide the Services to you, certain features and functionalities of the Services may no longer be available to you. Nothing in this Privacy Policy prejudices your rights to file a complaint with the Office of the Privacy Commissioner of Canada, and/or with any other applicable data protection authorities.

16. UPDATES TO THIS PRIVACY POLICY

We may change this Privacy Policy from time to time. We encourage you to periodically review this page for the latest information on our privacy practices. If we make material changes to this Privacy Policy we will notify you by email (if you have an account linked to a valid email address) or another manner through the Services that we believe is reasonably likely to reach you.

The "LAST UPDATED" legend at the top of the page indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Policy on the Services. Your use of the Services following these changes means that you accept the revised Privacy Policy.

17. CONTACT US

If you have any questions or concerns about this Privacy Policy, please contact us.

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

Attention: _____
Email: info@leadership-solutions.com