

Privacy Policy

CDR Companies, LLC (“us”, “we”, “our”) is committed to protecting and respecting the privacy and personal rights of our users. To assist users in understanding how we treat information collected by www.cdrassessmentgroup.com, or <https://cdr-tm.com/CDRManagementSystem/Portal/> or <https://coach.cdr-u.com/> (collectively, “the Site”), or in the course of our providing the True Talent Coach/CDR-U Coach service (the “Service”) to you, this policy states (1) how we collect, use, maintain, protect and disclose user information, and (2) the nature and types of information collected and stored by us.

Your use of the Service and/or voluntary provision to us of Personal or Usage Data constitutes acknowledgment of this Privacy Policy and consent to our collection and usage of data under the terms and conditions herein.

1. PERSONAL DATA: In this Privacy Policy, the term “Personal Data” means data that could be used to identify you personally, including but not limited to your name, gender, ethnicity, education history, degree field, login credentials, job classification and functional area of job classification, mailing address, physical address, email address, payment method details (such as credit card numbers, expiration dates and billing addresses) and your location.
2. USAGE DATA: We reserve the right to collect information based on your use of the Site that is collected automatically by the Site (or third-party services employed by us), which may include: IP addresses and/or domain names of computers utilized to access the Site, URI (Uniform Resource Identifier) addresses, the time and method of requests submitted to the Site’s server, the size of files received in response, the numerical code indicating the status of the server’s answer, the country of origin, browser features and operating system of the user, other parameters about an accessing device’s operating system and/or IT environment, time spent on each page within the Site, sequence of pages accessed from the Site, marketing and conversion data and statistics, analytics data, reports, reviews and surveys. Usage Data is essentially anonymous but could be used indirectly to identify a person.
3. INFORMATION COLLECTION: We collect information, potentially including Personal Data, from you in two ways:
 - a. *Voluntarily-Given Information*: Information you provide to us when you register, complete surveys or contact us with questions or for support.
 - b. *Automatically-Collected Data*: The programs and applications hosted and employed by us collect data about your usage or directly input by you in the usage of those programs.
4. COOKIES: Our website uses Cookies, a form of technology through which our server gives your accessing computing device information that provides additional functionality to your use of the site. For example, a cookie may allow you to access the site without having to enter your password each time you visit.

Cookies used by the site will not collect Personal Data except with your permission. Your browser should provide you the option not to use cookies if you so prefer, but we recommend that you leave the use of cookies switched on for a better experience using the site and its tools.
5. USE OF DATA: We use the data collected from you for the following purposes: (1) to provide and maintain the Service you have requested; (2) to notify you about changes to the Service; (3) to allow you to participate in interactive features of our Service when you choose to do so; (4) to provide customer care and support; (5) to provide analysis or valuable information so that we can improve the Service; (6) to monitor the usage of the Service; (7) to detect, prevent and address technical issues; (8)

to process payments; and (9) for scientific research to which only demographics, not names or addresses, is linked.

We will not sell or otherwise provide your Personal Data to third parties. We reserve the right to provide Usage Data to third parties for the purposes of traffic analysis or similar design and development use for our benefit and to improve the quality and type of service we provide to users.

6. PROTECTING INFORMATION: Unfortunately, it is impossible to unequivocally guarantee the security of any data transmission over the internet or method of data storage. Therefore, we cannot ensure or warrant the security of information you transmit to us or archive through the Site.

We are committed to the use of reasonable and appropriate security measures, both physical and electronic, to prevent unauthorized access to Personal Data or Usage Data and will follow generally-accepted industry standards to do so. In particular, we use secure socket layer technology (SSL) to encrypt information transmitted to the Site for the purchase of products or access to the Service.

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

7. TRANSFER OF DATA: Any Personal Data which we may collect on this site will be stored and processed in our servers located only in the United States. By using this Site, if you reside outside the United States, you consent to the transfer of Personal Information outside your country of residence to the United States.

8. THIRD PARTY SERVICE PROVIDERS: We may employ third-party companies and individuals to facilitate our Service, to provide the Service on our behalf, to perform Service-related services or to assist us in monitoring and/or analyzing the usage of our Site and Service. These third parties may be given access to your Personal Data to perform the tasks for which we have contracted with them, but they will be obligated not to disclose the information or to use it for any purpose other than the provision of services to us.

In particular but without limiting our right to use other third-party providers, we use Google Analytics, a web analytics service offered by Google that tracks and reports website traffic. You can opt out of providing information to Google Analytics by installing the Google Analytics opt-out browser add-on. For more information, including about Google's own privacy practices, please visit their Privacy & Terms page at <https://policies.google.com/privacy?hl=en>.

9. UNRELATED THIRD-PARTY COLLECTION OF DATA: Your mobile device manufacturer, mobile service provider or internet service provider may collect information from you that includes Personal Data, information about your usage of this site or that uses more general tracking technologies to monitor your usage of their service.

We are not responsible for and have no control over the usage of your information, which may or may not include Personal Data, by those who acquire your information (including Personal Data) through such means. If you have any questions about how your device manufacturer or service provider collects and uses information about you, you should contact that manufacturer or provider directly.

Likewise, our Service may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We have no control over the usage of data you provide to third-party websites. We strongly advise you to review the Privacy Policy of every site you visit.

10. MODIFICATION OF DATA: Upon request, we will permit you to request changes or updates to your Personal Data for legitimate purposes. We require identification prior to approving such requests. We

reserve the right to decline any requests that are unreasonably repetitive or systematic, require unreasonable time or effort of our technical or administrative personnel, or undermine the privacy rights of others. We reserve the right to permit you to access your Personal Data in any account you establish with the Site for purposes of making your own changes or updates, and in such case, instructions for making such changes or updates will be provided where necessary.

11. PERMITTED DISCLOSURES OF DATA: You agree that we are permitted to disclose Personal Data or Usage Data if: (1) we must do so to comply with a law, a court order, or other legitimate demand of an appropriate governmental authority; (2) to protect and defend our rights or property or against legal liability; (3) to prevent or investigate possible wrongdoing in connection with the Service; or (4) to protect the personal safety of users of the Service or the general public.
12. CHILDREN'S PRIVACY: Our Service does not address anyone under the age of eighteen or otherwise considered a minor by the jurisdiction in which they reside.
We do not knowingly collect personally identifiable information from minors. If you are a parent or guardian and you are aware that your child has provided Personal Data to us, please contact us. If we become aware that we have collected Personal Data from a minor without verification of parental consent, we will take steps to remove that information from our servers.
13. CHANGES TO POLICY: We reserve the right to change this Privacy Policy from time to time by updating the policy as it appears on this page of our website. Continued use of the Site and/or Service constitutes acceptance of the policy as revised and/or updated.
14. CALIFORNIA PRIVACY RIGHTS: Under California Law SB 27, California residents have the right to receive, once a year, information about third parties with whom we have shared information about you or your family for their marketing purposes during the previous calendar year, and a description of the categories of personal information shared. To make such a request, please send an email to the email address provided in our contact information below and include the phrase "California Privacy Request" in the subject line, the domain name of the website you are inquiring about, along with your name, address and email address. We will respond to you within thirty days of receiving such a request.
15. DATA PROTECTION RIGHTS UNDER GENERAL DATA PROTECTION REGULATION: We may use your Personal Data because: (1) we need to do so to perform a contract (the provision of Services) with you; (2) you have given us permission to do so; (3) processing the data is in our legitimate interest and is not overridden by your rights; (4) we need to do so to process payment; (5) we may be required to in order to comply with the law.

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. We aim to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

- The right to access, update or to delete the information we have on you. Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.
- The right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete.
- The right to object. You have the right to object to our processing of your Personal Data.

- The right of restriction. You have the right to request that we restrict the processing of your personal information.
- The right to data portability. You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
- The right to withdraw consent. You also have the right to withdraw your consent at any time where we relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests. You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local Data Protection Authority in the European Economic Area (EEA).

16. CONTACT INFORMATION: For questions or comments about this Privacy Policy, please email us at: support@cdrcompanies.com.