# Raise The Bar Privacy Policy

Last updated: February 16, 2022

This Privacy Policy describes how Raise The Bar Consulting, LLC ("RTB," "Raise The Bar," "we," "us" or "our") collects, uses, and shares information about you and the choices you have regarding this information. This Privacy Policy applies to the information we collect when you access or use our services, and technology platforms (including the websites and mobile applications that help us provide the coaching services) (collectively, the "Services"). Please note that this Privacy Policy does not apply to your use of third-party sites, services, or applications you may access through our Services. We encourage you to review the privacy policies of those third parties for more information regarding their privacy practices.

# **CHANGES TO THIS PRIVACY POLICY**

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of the policy. We encourage you to review the Privacy Policy whenever you access the Services to stay informed about our information practices and the ways you can help protect your privacy.

# **COLLECTION OF INFORMATION**

## Information You Provide to Us

We collect information you provide directly to us when interacting with us or using the Services. The specific information we collect depends on the context of your interactions with Raise The Bar, as detailed below.

## Training and/or Coaching Clients

Through your use of the Services, you will be asked to provide us information to help better facilitate your coaching and/or training experience. For example, to help you choose the right coach, you will respond to surveys to help us match you with a coach that aligns with your coaching goals. While these surveys will help us match you with the right coach, the surveys do not collect any personally identifying information. You will also be asked to complete an assessment that will allow you to gain insight into your goals and desires for your work with us throughout your coaching and/or training. To facilitate a robust and meaningful coaching experience, both you and your coach will have access to your responses.

We may also collect information such as development programs planned and attended, engagement status, session ratings, title, and any other information you choose to provide in conjunction with the Services. You may be asked, at various places within the services, to provide your opinions on RTB's services and quality of coaching and/or training. These opinions or reviews will be used to improve our services, and in some cases, may be shared with the coach, on a de-identified basis, for quality or educational purposes. We collect information to help coach and develop an individual leader's skills, such as name, address, e-mail address, phone number, feedback about the program, development goals, and other related notes to a leader's development. We collect and receive this information directly from the leader.

We supplement this information with additional information that we receive from the company where a leader is employed, including company goals, values, leadership framework, and organizational chart.

## Sensitive Personal Information or Demographic Information

The use of the Services does not require you to provide any sensitive personal information such as financial or demographic information. However, there may be times, such as testing a new tool or feature or conducting research studies, where we will ask for your consent to collect demographic information such as gender, race or ethnicity, pronouns, or to record your session. In all such instances your involvement and providing such information is voluntary, will have no impact on your use of the Services if you decline, and in the case you provide consent, such consent may be withdrawn at any time.

# Prospective RTB employees or RTB coaches

We collect information if you apply for a job or apply to become a coach, request customer support, or otherwise communicate with us. We will need to collect certain personal information from you in order to process your application, such as your name, email address, phone number, location, and work history. This information is used to evaluate your experience and communicate with you among others.

To be a Raise The Bar coach, you are not required to provide any sensitive personal information such as financial or demographic information. However, there may be times, such as testing a new tool or feature, staffing a specific program for customers, where we will ask for your consent to collect demographic information such as gender, race or ethnicity, or pronouns, or we may request your consent to record your session. In all such instances your involvement and providing such information is voluntary, and will have no impact on your ability to coach with RTB if you decline. In the case you provide consent, such consent may be withdrawn at any time.

# **Information Collected by Cookies**

We use different technologies to collect information, including cookies. Cookies are small text files placed on an individual's computer by websites that the individual has visited. They are used to make websites work more effectively, such as enabling you to sign in more efficiently and providing analytics on our site's usage and performance. No Personal Information is stored within them; however, details below describe some of the cookies Raise The Bar uses, and to explain why they are used.

We use the following cookies in conjunction with providing the Services.

| Name                | Purpose                  |
|---------------------|--------------------------|
| Google Suite        | Data housing platform    |
| Google Analytics    | Analytics                |
| Microsoft One Drive | Housing video recordings |
| Monday.com          | Management Software      |
| ActiveCampaign      | Email Automation         |
| HubSpot             | CRM Platform             |
| Integromat          | Integration Platform     |

Privacy Policy Link Google Privacy Policy Google Privacy Policy Microsoft Privacy Policy Monday.com Privacy Policy ActiveCampaign Privacy Policy HubSpot Privacy Policy Integromat Privacy Policy

If you wish, you may also opt-out of all cookies on your browser, by visiting the following links (note, this will opt you out of all cookies, not just raisebar.co)

Chrome <u>Opt Out</u> Safari <u>Opt Out</u> Explorer <u>Opt Out</u>

## Information We Collect From Other Sources

There may be a limited instance where we receive information about you from the coaches with whom you interact through the Services, such is when there is an issue with a session, or if you have raised an issue or concern with the coach and that coach needs additional information from us.

## **USE OF INFORMATION**

We may use the information we collect to provide, maintain, and improve the Services, including to assess and improve the quality of the coaching and/or training services.

In addition to the uses described in detail above, the information we collect from clients may also be used to:

- To provide coaching and training to individual leaders;
- To provide companies where leaders are employed with aggregated metrics and thematic summaries NONE of which contains personally identifiable information.
- To improve our delivery for current and future leaders.
- Provide and deliver the products and services you request, process transactions, and send you related information;
- Respond to your comments, questions, and requests;
- Send you technical notices and other administrative messages;
- Communicate with you about products, services, and events offered by us or others, and provide news and information we think will be of interest to you;
- Monitor and analyze trends, usage, and activities in connection with the Services;
- Conduct research, analysis, and surveys;
- Personalize and improve the Services and provide content or features that match user profiles or interests;
- Carry out any other purpose for which the information was collected.

## **Session Recordings**

If you have consented to the recording of a training session(s), the recordings will be used to inform analyses on the quality and effectiveness of your training session. We do not record coaching sessions. We only record the main room of training sessions and not the breakout rooms of sessions for the purposes of; helping provide leaders (in your cohort) who missed the session with the recording to catch up on what they missed, and/or to be viewed and analyzed by Raise The Bar employees only to help us assess and improve our delivery of the service provided. The session recordings will be securely stored and only those with a need-to-know will have access to the recordings.

# SHARING OF INFORMATION

When you use the Services, we will share information about you with our coaches and/or facilitators so that they can provide services to you, such as responses to surveys as noted above, and/or contact information.

# TRANSFER OF INFORMATION TO THE U.S. AND OTHER COUNTRIES

We are based in the United States and the information we collect is governed by U.S. law. By accessing or using the Services or otherwise providing information to us, you consent to the processing and transfer of information in and to the United States and other countries, where you might not have the same rights and protections as you do under local law.

Your Personal Data may be processed outside your jurisdiction, and in countries that are not subject to an adequacy decision by the European Commission or your local legislature and/or regulator, and that may not provide for the same level of data protection as your jurisdiction, such as the European Economic Area. We ensure that the recipient of your Personal Data offers an adequate level of data protection, for example, by entering into the appropriate back-to-back agreements and, if required, standard contractual clauses for the transfer of data as approved by the European Commission (as described in Article 46 of the General Data Protection Regulation),.

# DATA RETENTION

We retain leader data, through Google and Monday.com GDPR compliant servers, such as Name, Role, Email, Phone, and Development Goals and notes to be able to best serve the leader and their growth.

We store the info we collected about you for as long as is necessary for the purpose(s) for which we originally collected it, or for other legitimate business purposes, including to meet our legal, regulatory, or other compliance obligations.

## DATA BREACH

In the event of a data breach, we will alert all users affected by the breach, share what data was accessed, any possible consequences of the breach and what actions we are taking to mitigate the consequences.

## **THIRD-PARTY WEBSITES**

Raisebar.comay contain links to third-party websites and applications of interest that are not affiliated with us. Once you have used these links to leave the Site, any information you provide to these third parties is not covered by this Privacy Policy, and we cannot guarantee the safety and privacy of your information. Before visiting and providing any information to any third-party websites, you should inform yourself of the privacy policies and practices (if any) of the third party responsible for that website, and should take those steps necessary to, in your discretion, protect the privacy of your information. We are not responsible for the content or privacy and security practices and policies of any third parties, including other sites, services or applications that may be linked to or from the Site.

# **YOUR CHOICES**

# Your Information

You may update, correct or delete information about you at any time by contacting us at support@raisebar.co. Please note that we may retain certain information as required by law or for legitimate business purposes. We may also retain cached or archived copies of information about you for a certain period.

# **Promotional Communications**

If you are outside of the EU, you may opt out of receiving promotional communications from us by following the instructions in those communications or by emailing us at support@raisebar.co. If you opt out, we may still send you non-promotional communications, such as messages about your account or our ongoing business relations.

## CALIFORNIA

If you are a California resident, you have certain rights and protections under the law regarding the processing and sale of your personal data. The California Consumer Privacy Act (CCPA) grants new privacy rights to Californians, including rights to:

- The right to know about the personal information a business collects about you and how it is used and shared;
- The right to delete personal information collected from you (with some exceptions);
- The right to opt-out of the sale of your personal information; and
- The right to non-discrimination for exercising their CCPA rights.

Businesses are required to give consumers certain notices explaining their privacy practices. This section and our Privacy Policy will explain to you what personal information we may collect and the purposes for which we use this information.

Raise The Bar does not sell your personal information. RTB may share your personal information with our Service Providers, who are defined within CCPA as entities who will process your personal information on behalf of RTB but are contractually limited to processing and retaining your information solely to provide the service to RTB.

If you are a California resident and would like to exercise any of your rights as described here, e-mail us or contact us at: Raise The Bar Consulting, LLC 2451 W Hutchinson St. Chicago, IL 60618 email: support@raisebar.co

# EUROPEAN ECONOMIC AREA

If you are in the European Economic Area ("EEA"), you have certain rights and protections under the law regarding the processing of your personal data.

# Legal Basis for Processing

If you are in the EEA, when we process your personal data we will only do so in the following situations:

- We need to use your personal data to perform our responsibilities under our contract with you (e.g., processing payments for and providing the services you have requested);
- We have a legitimate interest in processing your personal data. For example, we process your personal data in order to provide you the Services, to communicate with you about changes to our Services, and to provide, secure, and improve our Services; or
- You have provided consent for us to process your personal data.

# **Data Subject Requests**

If you are in the EEA, you have the right to access personal data we hold about you and to ask that your personal data be corrected, erased, or transferred. You may also have the right to object to, or request that we restrict, certain processing. If you would like to exercise any of these rights you may contact us as indicated below.

# **Questions or Complaints**

If you are in the EEA and have a concern about our processing of personal data that we are not able to resolve, you have the right to lodge a complaint with the data privacy authority where you reside. For contact details of your local Data Protection Authority, please see: <a href="http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index\_en.htm">http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index\_en.htm</a>.

Contact Information If you have questions or comments about our Privacy Policy please email us at support@raisebar.co.

You can also reach us by U.S. mail at: Raise The Bar Consulting, LLC 2451 W Hutchinson St. Chicago, IL 60618