



## European Union (EU) Privacy Policy

At DNA Behavior Solutions, LLC ("the Company"), the privacy and security of our clients' personal information are very important to us. While providing clients with all the benefits of our online assessments and education services, we maintain tight control over all financial and personal information. Our commitment to security and privacy is backed by data encryption, login and password authentication and network integrity technologies.

### Our Philosophy

As a client of the Company, you can rest assured that your personal information will be preserved in confidence. The Company adheres to the stringent requirements of the EU Privacy clauses for personal data transfer processors c2010-593, Article 26(2) of Directive 95/46/EC.

The Company will only collect, use, disclose or store personal information in accordance with the Article and this privacy policy.

### Definition of Personal Information

**Personal information** means any information or an opinion about you that identifies you, or from which your identity can reasonably be determined, whether the information is true or not and whether the information is recorded in a material form or not.

**Sensitive** personal information includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, and the processing of data concerning health or sex life.

As a general rule, we do not collect sensitive personal information.

However, if we do collect sensitive personal information, we may only collect it with your consent and if the information is reasonably necessary for our functions or activities or as otherwise permitted by law.

### Our Internal Use of Personal Information

The Company collects information during the assessment process. The mandatory personally identifiable information includes first name, surname, phone numbers, postal address and email address. The Company will only use your personal information internally to process, respond to your requests and to communicate with you. Employees and contractors of the Company are bound by strict confidentiality agreements and any misuse of client information will be grounds for disciplinary action up to and including termination. Furthermore, client information is made available to employees only on a need-to-know basis. We do not sell your information to third-party organizations.

### Information Collected During DNA Discovery Process Completion

The DNA Behavior Discovery Administrative System serves the sole purpose of better understanding an individual's behaviors. We collect responses to DNA Discovery Processes in order to better understand what motivations drive the decisions you make in areas of your day to day life. Upon the completion of any DNA discovery process, we will store your responses as well as your contact information (name and email) in our database for the purposes of identifying these records as yours. In addition, we may also collect demographic information such as language and country of residence to customize the DNA Behavior Discovery experience for you subject to obtaining your prior consent.



### **Use of Information Collected During DNA Discovery Process Completion**

We gather your responses and translate them into key behavioral insights. The key behavioral insights we produce vary by application. Typically the key behavioral insights are produced to allow a business the ability to customize the experience for you and cater a service delivery to your needs.

### **Communication DNA Sharing and Privacy Settings**

Upon completing the Communication DNA discovery process, you will have the option to share your Communication DNA record with friends, family and other members of the DNA Community. This feature allows you the choice of easily sending your Communication DNA results to others so that you can improve your interactions with those around you. This optional feature also allows members of the DNA Community (Communication DNA licensed users) to access your Communication DNA record if they have previously established a relationship with you. If a business has your personal contact information saved within their customer database, DNA Behavior may provide them access to view your Communication DNA record, subject to your prior consent. In this process, DNA Behavior does not provide access to your personal contact information, just your Communication DNA results.

### **Our Representatives**

The Company and its authorized representatives will only use the information for the purpose of facilitating the DNA Behavior Discovery Process. Any representative will receive only the minimum amount of information necessary for this purpose, and will be contractually obligated to preserve that information in confidence. Further, these representatives will be contractually prohibited from using any information supplied to them for any other purpose.

### **Third-party Disclosure of Personal Information**

The Company will not disclose any personal information about you to third parties without your consent or unless compelled to do so by law.

### **Disclosure Overseas**

### **Your Access**

You may at any time request from the Company, a copy of your personal information that has been obtained through this site. The Company will provide it to you and correct any errors advised by you.

### **Record Retention**

The Company will maintain your personal information and assessment data for validation and research purposes. Where your personal assessment data is used for these purposes, it will be not identifiable to you, i.e. your name will be "blinded" and the data aggregated and assessed with all other user data.

### **Storage and Security of Information**

The Company uses a variety of physical and electronic security measures including restricting physical access to our offices, firewalls and secure databases with the aim of keeping personal information secure from misuse, loss or unauthorized use or disclosure.

We will take reasonable steps to:

protect your personal information from interference, misuse, loss, unauthorized access, modification or disclosure and destroy or permanently de-identify your personal information when it is no longer required; and keep your personal information up to date, accurate, complete and relevant.

### **Cookie Policy**

To enable the Company to develop personalized service offerings online, the Company uses "cookies" to maintain continuity within a client's Online Service session. Only temporary cookies that last for a single session are used. Both the client's browser and the Company's servers delete the session-specific cookies when the client logs out. The Company does not use cookies to collect or store personal information, and does not share cookies generated by the Company with other parties.

### **Website Links**

The website may provide links to other sites. This Policy Statement does not apply to these linked sites. The Company recommends that you read the posted privacy statement whenever interacting with the website.

### **Access and Correction**

You may request access to or seek correction of any of the personal information we hold about you unless an exception under the Act applies. The DNA Behavior system provides online access of your personal details such as name and email address which you may access and update at any time. If you request DNA Behavior to provide this information, we may charge you a reasonable fee to provide the information requested. Please contact our [Company Secretary] as below, to seek access to your personal information or if you have a complaint concerning your information privacy. We may deny your request to access or correct your personal information in some circumstances. However, if we do this, we will provide you with written reasons as to why we have refused to provide the information requested. We will also provide you with information about the complaint mechanisms available to you.

Our Company Secretary will investigate any access or correction requests and respond to you as soon as reasonably practicable and in the manner requested by you if it is reasonable and practicable to do so.

### **Use of a Pseudonym**

If you wish to do so, you may deal with you anonymously or with a pseudonym, unless it is not practicable for us to deal with you on that basis.

### **Complaints or Further Information**

We recognize the responsibility of protecting the privacy of your personal information. If you have any questions or comments about our administration of your personal information please contact the [Company Secretary] at the contact details below or you can go to the European Commission Justice website: [http://ec.europa.eu/justice/data-protection/individuals/rights/index\\_en.htm](http://ec.europa.eu/justice/data-protection/individuals/rights/index_en.htm).

You may also use these contact details to communicate any concerns or complaints that you have regarding compliance with our Privacy Policy and the APPs.

Under the [Data Protection Directive](#), every EU country must provide one or more data protection supervisory authorities to ensure that data protection law is correctly applied. Complaints regarding breaches of data protection law *should* be addressed to the relevant [national supervisory authority](#). The Commission has no competence to



monitor compliance of data controllers or to impose penalties.

The supervisory authority must investigate complaints and may temporarily ban data processing which is the subject of a complaint. If the supervisory authority finds that data protection law has been violated, it can order the data erased or destroyed and/or ban further processing.

Your complaint to the supervisory authority should preferably be put in writing. In some EU countries, the supervisory authority provides standard forms for complaints, or complaints can be sent by email.

Decisions by the supervisory authorities which give rise to complaints may be appealed against through the courts.

For more information, please consult your [national supervisory authority](http://ec.europa.eu/justice/data-protection/bodies/index_en.htm): [http://ec.europa.eu/justice/data-protection/bodies/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/index_en.htm).

### **Responsibility and Review**

The [Company Secretary] is responsible for compliance with this Policy and for ensuring that it is brought to the attention of existing and new employees or contractors of the Company. This policy will be reviewed periodically and updated where required.

### **Our Contact Details**

If you have any questions or comments concerning this Policy or our handling of your personal information, you may contact the [Company Secretary] at:

Address: DNA Behavior Solutions, LLC  
5901-A Peachtree Dunwoody Rd.  
Suite 375  
Atlanta GA 30328

Tel: 770 274 0311

Email: [inquiries@dnabehavior.com](mailto:inquiries@dnabehavior.com)

### **Changes to the Policy**

The Company may amend this policy from time to time. Changes will be posted on our website at [www.dnabehavior.com](http://www.dnabehavior.com) and will be effective immediately upon publication.