

# Privacy Policy

Last Updated: December 22, 2020

Vistage Worldwide, Inc. and its global subsidiaries and successors (collectively “Vistage”) is committed to protecting the privacy of individuals who visit our public, private and/or restricted-use Web sites, including but not limited to: [www.vistage.com](http://www.vistage.com) and [my.vistage.com](http://my.vistage.com) (collectively, the “Sites”), as well as individuals who register to use our Services as defined below or who register to attend Vistage events.

This Privacy Policy describes how and why Vistage collects, uses and shares the personal information we receive or that you make available to us by using our Sites, applications, services, or events and programs offered by Vistage (collectively, the “Services”). It also describes the choices available to you regarding Vistage’s use of your personal information, the steps you can take to access this information and, where applicable, to request that we correct or delete it. We can be contacted by using the details in the “How to contact us” section below.

Vistage may also provide further privacy notices based on applicable regions and with respect to other interactions with you (for example, specific services requests). Those terms are to be read in conjunction with this Privacy Policy.

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## Personal information we collect

Vistage collects personal information in a variety of ways described in this Privacy Policy. The types of personal information that we collect will depend on how you interact with us, as well as your location and applicable law. In addition to any other privacy notices you might have received, Vistage has collected following types of information in the past 12 months:

### Site users

The following information may be collected when you visit our Sites:

- **Contact details:** first and last name, email address, postal address, phone number.
- **Business information:** company name and contact details, number of employees and annual revenue.
- **Location data:** physical location (city, state, country) which you may provide to us or which can be inferred by an IP address.
- **Internet and electronic network activity information:** browsing history, search history, your operating system, date and time information, online identifiers (e.g. IP address or other similar identifiers) and other technical information about your device (e.g. cookie and pixel tag information).

### Employees, Independent Contractors and Candidates

Employees and independent contractors have received separate privacy notices informing them of the types of information that Vistage collects, the purposes for such collection and a link to this Privacy Policy.

The following personal information may be collected regarding candidates for employee and independent contractor positions:

- **Additional contact details and other identifiers:** in addition to the information described in the “Site Users” section above, Vistage may also collect residency and work permit status, driver’s license number, government identification numbers and/or other similar identifiers.
- **Protected classifications and other demographic data:** age, gender, race, ethnicity and/or similar demographic information. We will use this information to comply with anti-discrimination laws and government reporting obligations, to help ensure equal employment opportunities and/or to conduct internal research on company demographics.
- **Background information:** academic and professional qualifications, education, CV/resume, credit history and/or civil/criminal records data (utilized for background check and vetting purposes where permissible and in accordance with applicable law).
- **Location data:** physical location (e.g. city, state, country).

### Vistage Community Members

When you become a Vistage member (directly or through a Vistage affiliate), independent contractor, employee, affiliate or a Vistage alumnus (collectively referred to as “Vistage Community Member”), Vistage may ask you for additional personal information. Depending on your relationship with us, and in addition to any previous privacy notice you received, relevant personal information may include:

- **Account credentials:** username, password and similar account authentication information.
- **Financial information:** credit card, billing, bank account details and other payment information.

- **Commercial information:** records of services purchased, obtained or considered, or other purchasing or consuming histories or tendencies.
- **Inferences drawn from other personal information:** profile reflecting preferences, characteristics, predispositions, behavior, attitudes, abilities and aptitudes. Our processing of this personal information always includes manual (human) methods of processing.

## How we collect personal information

Vistage collects the personal information described above from the following sources:

### Directly from you

Vistage collects personal information about you when you provide us with your personal information. Examples include when you register with any of our Sites, enter into a contract with us for Services or when you voluntarily provide personal information via online or paper submission forms, surveys, or when you subscribe to Vistage newsletters.

### Indirectly from you

When you visit our Sites, Vistage automatically receives certain internet and electronic network activity information. This personal information is automatically recorded on our server logs from your browser, including unique identifiers such as your Internet Protocol (IP) address, Vistage cookie information, and the page you request. See the “Cookies & pixel tags” section below for a more details on how Vistage uses cookies and pixel tags. Vistage also collects information using analytics tools (directly or through our third party partners and advertisers) when you visit our Sites. This information is collected to help us improve our Sites and to provide relevant content.

### Our partners and advertisers share information with us

Vistage may receive personal information about you from our affiliates, advertisers, data analytics providers, social networks, data brokers, partners, independent contractors and other authorized third parties or service providers who are working on our behalf.

## How we use personal information

Vistage uses personal information to operate, manage and improve our Services and Sites. Vistage may use the personal information we collect for one or more of the following business purposes:

### Fulfill your requests

When you make requests of Vistage, Vistage will use the information you provided to fulfill these requests. For example, if you share contact and business information to request more details about our Services, we will use that personal information to respond to your inquiry.

### Provide Services

If you are a Vistage Community Member, your personal information is used to administer your account and enable you to connect with fellow Vistage Community Members. This includes our directory of members and Chairs, which is made available to all Vistage Community Members worldwide.

### Operate, maintain and improve our Sites

Vistage will record your use of our Sites to operate and improve our Sites, thus helping us to better understand your needs and interests. Vistage uses certain tools to improve and personalize your experience (e.g. Google Analytics).

### Communicate with you

Your personal information may also be used to send additional information about Vistage's Services, updates, promotions and events ("Communications") unless you opt out from receiving such Communications. We will seek your advance permission to send Communications if legally required.

### Administer the Vistage alumni program

Like a university, Vistage has a legitimate interest in and relies on long-lasting relationships with its community to operate, grow and maintain accurate records. To complement and extend the Vistage experience for Vistage Community Members, Vistage runs an alumni program. Vistage may send Communications to former members, independent contractors and employees to provide information on developments and possible opportunities. You will have the right to opt-out of or to unsubscribe from such Communications if you wish.

### General business and legal obligations

Vistage also collects personal information described above to conduct audits, comply with our legal obligations, resolve disputes, enforce our agreements and conduct mergers or acquisitions.

The personal information you have provided to Vistage is used for the purposes described in this Privacy Policy or for purposes disclosed in a separate privacy notice.

## **How we share personal information**

Vistage may share your personal information with affiliates for business purposes related to customer support, technical operation and/or account management.

We may also make your personal information available to authorized third parties or service providers for Vistage business purposes, such as acting on our behalf to assist in providing Services, technical support and account management. In the past 12 months, Vistage has disclosed personal information listed in in this Privacy Policy to the following categories of recipients for Vistage business purposes:

- Service providers, including customer relation management solutions (e.g. Salesforce), event management platforms (e.g. Cvent) and cloud database management services (e.g. Box.com).

- Independent contractors, including Vistage Chairs, speakers and business partners.
- Third party analytic/tracking cookies service providers (e.g. BlueConic, Google Analytics).

These authorized service providers are contractually required to abide by our data privacy requirements and are not permitted to use your personal information for any purpose unrelated to providing services to Vistage. Vistage will not otherwise share your personal information with other individuals or companies except when you have otherwise authorized this information to be shared; in circumstances required by law; in the exercise of our legal rights; to effect a merger/acquisition; to investigate, prevent, or take action regarding actual or suspected illegal or malicious activities; or to address actual or suspected violations of Vistage's Terms of Use, and Confidentiality Pledge and Standards.

Vistage does not sell personal information about you.

## How long we keep personal information

Vistage retains your personal information for the duration of the time that is consistent with the original purpose of collection. For example, we may retain your personal information while your account to use our Sites or Services is active. We may also retain personal information for a period of time thereafter to:

- allow for the recovery of accounts if requested by you,
- analyze the data for Vistage's business operations,
- administer the Vistage alumni program, and/or
- conduct audits, address our ongoing legal rights/obligations, resolve disputes, and enforce our agreements.

## Our legal basis for processing personal information

Vistage may rely on various legal means or legal bases for collecting and processing personal information, including:

- your consent (where necessary),
- a legitimate interest,
- necessity to enter into and perform contracts, and
- to comply with our legal obligations.

The legal bases Vistage is required to use in order to collect and use your personal information will depend on your interaction with us, applicable law and your location.

### Site users

When you visit our Sites, Vistage collects your personal information directly from you based on the input you voluntarily provide as well as indirectly via cookies and similar technologies for the business purposes described in this Privacy Policy. Your personal information may also be used to send Communications as described above, unless you opt-out from receiving such Communications.

Vistage has a legitimate interest in attracting new Members and understanding how our Sites are being used.

We will seek your advance permission to use cookies or to send Communications, where legally required.

### Vistage Community Members

In addition to the uses applicable to all Site users, your personal information will be used to administer your account and provide requested Services. The legal basis for administering your Vistage account and providing related Services is necessity to perform our contractual obligations.

Additionally, we have a legitimate interest in providing Vistage Community Members with a international network. As a part of the Vistage Community Member experience, we enable you to connect with other Vistage Community Members by storing your business information in a directory, which is made available to all Vistage Community Members worldwide. You may update your visibility preferences at any time by navigating to your account under the My Vistage website and select the “Edit profile & privacy” link.

Due to its unique business model, Vistage has a legitimate interest in administering an alumni program to continue to grow and nurture long-lasting relationships with Vistage Community Members.

Vistage will also send Communications in furtherance of our legitimate business interest to maintain relationships, obtain referrals and to promote our range of Services and events. Again, Communications will cease if you choose to opt-out.

## **International transfer of information collected**

Vistage has its global headquarters in the United States and Vistage’s primary storage of personal information collected is in the United States. Depending on where you are located and applicable law, Vistage will rely on certain legal bases to transfer your personal information into the United States such as: your consent (if required), to perform a contract with you or to fulfill Vistage’s legitimate interest which does not outweigh your rights and freedoms.

We take precautions to keep your personal information secure. Where necessary to comply with applicable law, Vistage also enters into data processing agreements and Standard Contractual Clauses with its authorized third parties and service providers.

## How to access and control your personal information

Your rights to access and control your personal information may vary depending on your location and applicable law. If you are a European or United Kingdom resident, see the “European and United Kingdom residents” section below for specific details.

To learn how to exercise your rights under this Privacy Policy, see the “How to exercise your rights” section below. In general, since Vistage provides services around the world, we acknowledge the following core privacy rights:

### Access to your personal information

You have the right to request disclosure of certain information to you about our collection and use of your personal information. Any limits or exceptions under applicable law will be explained in our response to your verified request.

### Deletion request rights

You have the right to request deletion of your personal information that Vistage collected and retained. Upon receipt of your verifiable request, we may delete (and direct our service providers to delete) your personal information from our records to the extent required by law. There are certain exceptions where applicable law either allows or requires us to deny your deletion request. Such a denial will be explained in our response to your verifiable request.

### No discriminatory treatment

When you choose to exercise your privacy rights, you will not receive any discriminatory treatment from Vistage. This is not only a legal requirement, but it is in line with Vistage’s operational principal of “respect for the individual.”

### European and United Kingdom residents

The European Union’s General Data Protection Regulation (EU GDPR), the United Kingdom’s Data Protection Act 2018 (UK GDPR) and other countries’ privacy laws provide certain rights.

You have the following rights, including the right to: access your personal information; correct, delete, restrict, or object to the processing of your personal information; as well as the right to data portability of your data under certain conditions. You may also request information about: the processing purposes, the category of personal data, the categories of recipients to whom your data has been disclosed, the source if not collected directly from us, or the planned storage period.

If you have an unresolved concerns that we have not addressed satisfactorily related to how we are processing your personal information, please contact the European and United Kingdom Data Protection Authorities. For more information on how to contact these authorities, [click here](#).

### How to exercise your rights

To exercise the rights described above, please submit a verifiable request to us by either contacting us using the information in the “How to contact us” section below or by using our [web form](#).

Only you, or a person that you authorize to act on your behalf, may make a request related to your personal information; Vistage must be able to verify such requests through the exercise of reasonable diligence. To be verifiable your request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request. We will use personal information provided in a request solely for the purpose of verifying the requestor's identity or authority to make the request.

## Communication preferences

You may manage your receipt of Communications via email by clicking on the “unsubscribe” link located on the bottom of Vistage emails. Additionally, you may opt out of Communications by filling out our [web form](#) or by emailing us at: [privacy@vistage.com](mailto:privacy@vistage.com).

Vistage may retain some of your personal information solely for the purposes of knowing your wish to not be contacted again in the future, or for other purposes that are legally permitted or required.

## Cookies & pixel tags

We collect visitor information by using cookies and pixel tags.

### Cookies

Cookies are files or pieces of information that may be stored on your device when you visit a Web site. This file or piece of information allows a user to move quickly and easily around our Sites and is used to identify returning users. We also use cookies to track a user's sessions, storing preferences and settings, providing interest-based advertising, determining what site features are most popular so we can develop our Sites and content, and fulfilling other legitimate interests.

The use of cookies is an industry standard and commonly done on websites. However, we do not use cookies to retrieve involuntary information about your computer.

Accordingly, if you would prefer, you can set up your browser to refuse cookies or to alert you to their presence and thereby allow you to remove them from your computer. If you reject cookies,



you may have difficulty navigating parts of our website and may need to enter identifying information each time you access a password-protected page.

### Pixel tag

A pixel tag, also known as a clear GIF or web beacon, is an invisible tag or tiny graphic image placed on certain pages of our website or in emails but not on your computer. When you access these pages, pixel tags generate a generic notice of that visit. They usually work in conjunction with cookies, registering when a particular computer visits a particular page. If you turn off cookies, the pixel tag will simply detect an anonymous website visit. Pixel tags help us analyze our visitors' online behavior and measure the effectiveness of our websites and our advertising. We work with service providers that help us track, collect and analyze this information.

Pixel tags on our sites may be used to collect information about your visit, including the pages you view, the features you use, the links you click, and other actions you take in connection with the Sites. This information may include your computer's Internet protocol (IP) address, your browser type, your operating system, date and time information, and other technical information about your computer. We may also track certain information about the identity of the websites you visit immediately before and after coming to our site. We do not otherwise track any information about your use of other websites.

Pixel tags and cookies in our emails may be used to track your interactions with those messages, such as when you receive, open or click a link in an email message from us.

We also work with third-party companies that use tracking technologies to serve advertisements on our behalf across the Internet. These companies may collect information about your visits to our websites and your interaction with our advertising and other communications.

## **Links to other web sites**

Our Sites contain links to other third party websites; however, we are not responsible for the privacy practices or the content of such websites and do not make any representation as to the existence, sufficiency, accuracy or completeness of such websites or the privacy policies of such websites. Please see the website's privacy policy for more information on the website owner's data protection practices.

## **Changes to this Privacy Policy**

Vistage may update this Privacy Policy at any time, for any reason, without notice to you other than posting the amended Privacy Policy to this Site. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary e-mail address we have on file for you or by placing a prominent notice on the applicable Sites.

Vistage endeavors to ensure that this Privacy Policy is fully compliant with all applicable laws, however, the laws throughout the world are constantly evolving and changing. To the extent any part of this Privacy Policy is not compliant with applicable law, the non-compliant part shall be

deemed automatically amended to the extent necessary to permit this Privacy Policy to be compliant.

## How to contact us

Vistage has appointed a Data Protection Officer (DPO) who is responsible for overseeing questions related to this Privacy Policy. If you have any questions please contact the DPO:

- By filling out our [web form](#)
- By email: [privacy@vistage.com](mailto:privacy@vistage.com)
- Call toll free in the United States: 800.589.0531
- Or write:

Vistage Worldwide, Inc.  
Attention: Data Protection Officer  
4840 Eastgate Mall  
San Diego, CA 92121