

# Development Dimensions International's Privacy Policy

Privacy Policy 04/09/2022

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## Introduction:

Development Dimensions International (“DDI”) takes your privacy very seriously. Please read this privacy policy carefully as it contains important information about who we are, how and why we collect, store, use, and share your personal information. This privacy policy also explains your rights in relation to your personal information and how to contact us or supervisory authorities if you have a complaint or wish to [submit a data subject request](#). If you have questions or complaints regarding our Privacy Policy or practices, please contact our Data Protection Officer at [DataProtectionOfficer@ddiworld.com](mailto:DataProtectionOfficer@ddiworld.com).

DDI designed and manages the site you are viewing. DDI provides a range of Internet-based tools to support leadership solutions including, leadership development, talent strategy, and assessment solutions to the global worldwide market. This Privacy Policy applies to the collection and use of information of the websites and platforms on sites where this policy is linked (“Sites”).

The use of information collected through our Sites shall be limited to the purpose for which it was gathered, i.e., providing a service for which a Client has engaged DDI, providing information to prospective Clients, gathering information for research purposes, or gathering information on applicants for career opportunities at DDI.

We collect and use certain personal information about you. When we do so we are subject to various laws in the United States and the General Data Protection Regulation (“GDPR”) which applies across the European Union (including in the United Kingdom), and we are responsible as “processor” of that personal information for the purposes of those laws. Further, we are also subject to China’s Personal Information Protection Law (“PIPL”) and are responsible as “processor” of that personal information. Additionally, we are also subject to Canada’s Personal Information Protection and Electronic Documents Act (“PIPEDA”). We will abide by each of these laws solely to the extent that we process your data subject to the jurisdiction covered by each applicable law.

**Key Terms:**

We, us, our	<ul style="list-style-type: none"> <li>• Development Dimensions International, Inc.(U.S.)</li> <li>• <a href="#">Click here to view a list of our global offices</a></li> <li>• <a href="#">Click here to view a list of our licensed consultants</a></li> <li>• For more information, see our list of global offices and licensed consultants at:  <a href="https://www.ddiworld.com/about/global">https://www.ddiworld.com/about/global</a>  <a href="https://www.ddiworld.com/global-strategic-partnerships">https://www.ddiworld.com/global-strategic-partnerships</a></li> </ul>
Our Data Protection Officer	<a href="mailto:DataProtectionOfficer@ddiworld.com">DataProtectionOfficer@ddiworld.com</a>
Personal information	Specific types of information relating to an identified or identifiable individual according to established information classifications
Special category personal information	<p>Personal information revealing, political opinions, religious beliefs, philosophical beliefs, or trade union membership.</p> <p>Data concerning health, sex life or sexual orientation</p>

**Categories of Personal Information:**

**Personal Information We May Collect About You  
As Part of our Services:**

Identifiers (e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers).	<ul style="list-style-type: none"> <li>• Name</li> <li>• IP address</li> <li>• Email address</li> <li>•</li> </ul>
Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name or signature	<ul style="list-style-type: none"> <li>• Employment application data (e.g., Pinpoint and others)</li> <li>• Assessment results</li> </ul>
Characteristics of protected classifications under California or federal law.	<ul style="list-style-type: none"> <li>• N/A</li> </ul>
Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies)	<ul style="list-style-type: none"> <li>• Marketing data</li> <li>• Data subject request records</li> </ul>
Genetic or Biometric information	<ul style="list-style-type: none"> <li>• N/A unless otherwise provided to DDI unsolicited</li> </ul>
Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement)	<ul style="list-style-type: none"> <li>• User activity information obtained from permanent, persistent, temporary and/or session specific cookies for DDI webpages and applications.</li> </ul>
Geolocation Data	<ul style="list-style-type: none"> <li>• Geolocation data obtained via: <ul style="list-style-type: none"> <li>• IP address</li> <li>• Cookies</li> <li>• Troubleshooting and support services</li> </ul> </li> </ul>
Audio, electronic, visual, haptic, or similar information	<ul style="list-style-type: none"> <li>• Audio information (e.g., voice transcriptions)</li> </ul>
	<ul style="list-style-type: none"> <li>•</li> </ul>

**Categories of Personal Information:**

**Personal Information We May Collect About You As  
Part of Your Employment with DDI:**

Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or	<ul style="list-style-type: none"> <li>• Employment application data (e.g., Pinpoint and others)</li> <li>• Assessment results</li> </ul>
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state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.	
Professional or employment-related information	<ul style="list-style-type: none"> <li>• Employment history</li> <li>• Professional accolades</li> </ul>
Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (FERPA)	<ul style="list-style-type: none"> <li>• Student education records of “eligible students” as defined under the Family Educational Rights and Privacy Act</li> <li>• Student directory information publicly disclosed by schools including: <ul style="list-style-type: none"> <li>• Student name</li> <li>• Address</li> <li>• Telephone number</li> <li>• Date and place of birth</li> <li>• Honors and awards</li> <li>• Dates of attendance</li> </ul> </li> </ul>

**Categories of Personal Information:**

**Personal Information We May Collect About You As Part of our Services:**

Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	<ul style="list-style-type: none"> <li>• DDI collects personal information drawn from inferences from the information identified above to create a profile about users who have opted-in to DDI-related products and/or services. These inferences include information about: <ul style="list-style-type: none"> <li>• Consumer preferences</li> <li>• User characteristics</li> <li>• Behavior</li> </ul> </li> </ul>
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The personal information listed above is required to provide products and/or services to you, unless otherwise specified within your DDI account page. If you do not provide personal information we request, it may delay or prevent us from providing products and/or services to you.

**How Your Personal Information Is Collected:**

DDI collects personal information directly from consumers’, website, email, phone, and indirectly from enterprise clients who may provide us with your information in accordance with applicable employment or contractor agreements. DDI may also collect information:

- Directly from a third party;
- From a third party (such as your employer) with your consent;
- From cookies on our website; and

- Via our IT systems, including:
  - Automated monitoring of our websites and other technical systems
  - Communication systems such as email and instant messaging services

DDI may also collect personal information from public sources. By posting personal information online that is publicly accessible, you may receive unsolicited messages from other parties in return. Please keep in mind that whenever you voluntarily disclose personal information online - for example on blogs, message boards, through email, or in chat areas - that information can be collected and used by others.

**How and Why We Use Your Personal Information:**

Under applicable data protection laws, as a processor DDI can only use your personal information if we have a proper reason for doing so, e.g.,:

- To comply with our legal and regulatory obligations;
- For the performance of our contract with you or your employer or to take steps at your (or your employer’s) request before entering into a contract;  
or
- Where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests. The table below explains what we use (process) your personal information for and our reasons for doing so:

<b>What We Use Your Personal Information For:</b>	<b>Our Reasons:</b>
To provide products and/or services to you	For the performance of our contract with you or to take steps at your request before entering into a contract
To verify identity	To comply with our legal and regulatory obligations
Other processing necessary to comply with professional, legal and regulatory obligations that might apply to our business, e.g., health and safety regulations.	To comply with our legal and regulatory obligations
Gathering and providing information required by or relating to audits, inquiries, or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, e.g. policies governing security and information use	For our legitimate interests or those of your employer, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training, and quality control	For our legitimate interests or those of your employer, i.e. to be as efficient as we can so we can deliver the best service for you at the best price

<p>Ensuring the confidentiality of commercially sensitive information</p>	<p>For our legitimate interests or those of your employer, i.e. to protect trade secrets and other commercially valuable information</p> <p>To comply with our legal and regulatory obligations</p>
<p>Statistical norming in relation to the services provided by DDI</p>	<p>For our legitimate interests or those of your employer to ensure fair and accurate data sets and measurement tools</p>
<p>Statistical analysis to help us manage our business, e.g. in relation to delivery of services, product performance, or other efficiency measures</p>	<p>For our legitimate interests or those of your employer, i.e. to be as efficient and relevant as we can so we can deliver the best service for you at the best price</p>
<p>Preventing unauthorized access and alteration to systems</p>	<p>For our legitimate interests or those of your employer, i.e. to prevent and detect criminal activity that could be damaging for us and for you</p> <p>To comply with our legal and regulatory obligations</p>
<p>Updating and enhancing clients records</p>	<p>For the performance of our contract with you or to take steps at your request before entering into a contract</p> <p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our clients/you about existing orders and new products</p>
<p>Ensuring safe working practices, staff administration and assessments</p>	<p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working safely so we can deliver the best service to you</p>
<p>Marketing our services to:</p> <ul style="list-style-type: none"> <li>• Existing and former customers;</li> <li>• Third parties who have previously expressed an interest in our services;</li> </ul>	<p>For our legitimate interests or those of a third party, i.e. to promote our business to existing and former clients</p> <p>For our legitimate interests or those of a third party,</p>
<p>External audits and quality checks, e.g. for ISO certifications, accreditations, and the audit of our accounts</p>	<p>For our legitimate interests ,i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards applicable in our industry</p>

	To comply with our legal and regulatory obligations
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DDI also collects information from our users at several different points on the Sites. Our clients may use our Sites to collect candidate/applicant personal information, including names, addresses, and phone numbers, regarding a specific job posting or opening. There is no direct relationship between the client’s site(s) and the Sites, although at a client’s request, client sites may link to content on the Sites.

To use full functionality offered by the Sites, a user may be required to provide certain Personal Information. Personal Information may be shared and used by DDI and the client (for which the applicable site is hosted) as well as any other third-party vendors secured by the client to facilitate candidate or employee assessment or selection processes.

Summaries of de-identified or anonymized and aggregated data analyses may be presented to public audiences (e.g., scientific conferences). Review of DDI’s general approaches and accumulated results with professional audiences ensures that DDI’s assessment methods remain up-to-date with best practices and professional, technical, and legal standards. While these summaries may be linked to general industries, the identities of client organizations and individuals remain completely confidential.

Summaries of aggregated data may also be used to create normative profiles (or “benchmarks”) for assessments. Normative profiles will not identify individuals or client organizations; however, the source data may link back to some or all of the client organizations that are contained within the data set for the purpose of defining the characteristics of the norm sample (such as platform, industry, etc.)

**DDI routinely shares personal information with:**

Our affiliates and licensees
Service providers we use to help deliver our products and services to you, (e.g., payment service providers, third-party consultants, and others)
Other third parties we use to help us run our business, such as marketing agencies or website hosts;
Third parties approved by you
Auditors (e.g., in pursuit of ISO and other certifications)
Our insurers and brokers (e.g., cybersecurity insurance providers)
Our bank(s)
Law enforcement agencies and regulatory bodies to comply with legal and regulatory obligations

We only allow our service providers to handle your personal information if we are satisfied they take commercially reasonable and appropriate measures to protect your personal information. We also impose contractual obligations on service providers to confirm they can only use your personal information to provide services to us, to you, or to remain compliant with applicable laws and regulations of pertinent jurisdictions. We may also share personal information with external auditors in relation to ISO accreditation and the audit of our accounts.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business during a re-structuring. We will typically anonymize or de-identify information,

but this may not always be possible. Recipients of your personal information will be bound by confidentiality obligations.

**Third Party Use of Personal Information:**

**Description:**

Online Surveys	<p>DDI's third-party online survey provider collects and stores user information in a secure and private manner on behalf of DDI to manage online surveys. This provider allows DDI to create surveys and questionnaires for distribution to potential survey respondents.</p> <p>Our third-party online survey service provider maintains respondent information that may include information about DDI survey recipients, and other demographics and data useful to DDI. Our third-party online survey provider uses the information they collect to improve the service they provide to DDI. No information is shared with other third parties.</p>
Newsletter Subscriptions	<p>DDI's third party newsletter publishing service provider for managing email newsletter subscriptions collects and stores visitor information in a secure and private manner on behalf of DDI. This information includes, but is not limited to, email address lists, articles, survey answers, letters, and usage statistics.</p> <p>This information is owned by DDI and is not accessible to any other third parties. If you no longer wish to receive our newsletter, you may opt-out by following the optout instructions which are included in each communication.</p>
Online Customer Service Chat	<p>DDI's third party online customer service chat service provider collects and stores user information in a secure and private manner on behalf of DDI to manage online chat sessions.</p> <p>If using this function, users will be asked to enter their names in whatever format or detail they prefer. During the chat, users engage in a live question and answer session with a DDI employee. Our third-party online customer service chat service provider maintains dialogue transcripts of these chats. After the chat, users may be asked to fill out an exit survey to obtain valuable feedback about DDI service. Filling out the exit survey is voluntary. The surveys may ask</p>

	<p>for contact information and for demographic information. Data is also collected through aggregated tracking information from cookies. Our third-party online customer service chat service provider uses the information they collect to improve the service they provide to DDI. No information is shared with other third parties.</p> <p>Our third-party online customer service chat service provider uses cookies to link profile information (submitted by individuals to DDI) with the chat sessions managed by DDI's employees. By setting a cookie, users do not have to enter their profile information more than once, thereby saving time while on the chat session. Other statistical information about how our Sites are used is collected to assist the user with their customer service experience.</p>
Tracking Technologies (limited to marketing purposes)	<p>Our third-party business service provider uses cookies to link visits to our site with click-through from pay-per-click sponsored ads, placed by DDI on external search engine sites. They work by placing a cookie on a user's computer when he/she clicks on one of our pay-per-click sponsored ads. Then, if the user reaches one of DDI's designated conversion pages, the cookie is connected to our web page. When a match is made, the third-party business service provider records a successful conversion for DDI.</p> <p>Some of our third-party business service providers (e.g., aggregate traffic analytic services such as Google Analytics, search engines and live help chat) use cookies on our site. We have no access to or control over these cookies. Third parties with whom we partner to provide certain features on our Site, or to display advertising based upon your web browsing activity, use local shared objects ("LSOs") such as HTML 5 to collect and store information. Various browsers may offer their own management tools for removing HTML 5 LSOs.</p> <p>This Privacy Policy covers the use of cookies by the Sites and does not cover the use of cookies by any third parties.</p>

	<p>Technologies such as cookies or similar technologies are used by DDI and our marketing partners on some of our Sites. These technologies are used in analyzing trends, storing username and password so that you do not have to enter it each time you visit the site, administering the Site, tracking users' movements around the Site and gathering demographic information about our user base. We may receive reports based on the use of these technologies from these marketing partners in an individual and/or aggregated format.</p>
<p>Advertising</p>	<p>We engage a third-party ad network to either display advertising on our Sites or to manage our advertising on other sites. Our third-party partner may use technologies such as cookies to gather information about your activities on this Site and other sites to provide you advertising based upon your browsing activities and interests. If you do not want to have this information used for serving you interest-based ads, you may opt-out by clicking, <a href="#">here</a> (or if located in the European Union click, <a href="#">here</a>). Please note this does not opt you out of being served all ads; you will continue to receive generic ads.</p>
<p>Promotional Communications</p>	<p>DDI may use your personal information to send you updates by mail, email, telephone, text message, or other instant message about our products and services, including exclusive offers, promotions, new products and/or suggested services.</p> <p>DDI maintains a legitimate interest in processing your personal information for promotional purpose (see above "How and why we use your personal information"). This means we do not usually require your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly prior to the communication.</p> <p>DDI will always treat your personal information with the utmost respect and never sell it to other organizations.</p> <p>You have the right to opt-out of receiving promotional communications at any time by:</p>

	<ul style="list-style-type: none"> <li>• Submitting a data subject request form via: <a href="https://corp.ddiworld.com/gdpr/data-request-form-individual">https://corp.ddiworld.com/gdpr/data-request-form-individual</a>;</li> <li>• Using the “unsubscribe” link in emails or “STOP” number in texts; or</li> <li>• By email at: <a href="mailto:DataProtectionOfficer@ddiworld.com">DataProtectionOfficer@ddiworld.com</a>;</li> <li>• By phone at +1-412-376-6803;</li> <li>• Or by postal mail sent to: Attn: DDI Data Protection Officer Development Dimensions International 1225 Washington Pike Bridgeville, PA 15017</li> </ul> <p>DDI may ask you to confirm or update your marketing preferences if you instruct us to provide further products or services in the future, or if there are changes in the law, regulation, or the structure of our business.</p>
Testimonials	<p>DDI may post customer testimonials on our Sites, which may contain personal information. We do obtain the client's consent via email prior to posting the testimonial to post their name along with their testimonial. If you wish to have your personal information removed from this section of our site, please contact us at <a href="mailto:DataProtectionOfficer@ddiworld.com">DataProtectionOfficer@ddiworld.com</a>.</p>

**Personal Information Disclosed to Vendors:**

In the preceding 12 months, we have disclosed to vendors the following categories of personal information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, direct or indirectly, with a particular consumer or household:

- Identifiers (e.g., first and/or last name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers);
- Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, physical characteristics or description, address, telephone number, education, employment, employment history, or any other similar information;
- Characteristics of protected classifications under California or federal law;
- Commercial information (e.g., products or services purchased, obtained, or considered, or other purchasing or consumer histories, tendencies or similar information);
- Biometric information;

- Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement);
- Geolocation data;
- Audio, electronic, visual, haptic, or similar information;
- Professional or employment-related information;
- Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer’s preferences and characteristics.

### **Where Your Personal Information is Held:**

All Personal Information, regardless of the country of origin, is transferred to, processed, and stored in the United States. Data may also be accessed or used globally where authorized Client or DDI associates providing services to the Client are located. In addition, DDI is compliant with the General Data Protection Regulations (GDPR) and the associated requirements to the extent we are processing data subject to GDPR jurisdictions.

Information may also be stored at our offices and those of our group companies, third party agencies, service providers, employees, contractors, affiliates, representatives, and agents as described above (see: “Who We Share Your Personal Information With” above). Some of these third parties may be based outside the European Economic Area and the United States. Note: subprocessors’ servers are not located outside the EEA and U.S. For more information, including on how we safeguard your personal information when this occurs, see below: “Transferring Your Personal Information Out of the EEA and U.S.”

### **How Long Your Personal Information Will Be Kept:**

DDI will retain your personal information while you have an account with us or while we are providing products or services to you, and for up to 5 years post user inactivity. Thereafter, we will keep your personal information for as long as is necessary:

- To respond to any questions, complaints, or claims made by you or on your behalf;
- To fulfill a lawful request made by a regulatory body of an applicable jurisdiction
- To show that we treated you fairly; or
- To keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information. DDI may however, retain and use your information in anonymized format for research purposes for indefinite periods of time.

When it is no longer necessary to retain your personal information subject to the agreed upon retention period, DDI will delete or anonymize said information.

### **Transferring Your Personal Information Out of the EEA and U.S.:**

To deliver services to you, it is sometimes necessary for us to share your personal information outside the European Economic Area and United States, e.g.:

- With our offices outside the EEA and U.S.;
- With your and our service providers located outside the EEA or U.S.;
- If you are based outside the EEA or U.S.;
- Where there is an international dimension to the services we are providing you.

The following countries to which we may transfer personal information have been assessed by the European Commission as providing an adequate level of protection for personal information:

- Andorra, Argentina, Canada, Faroe Islands, Guernsey, Israel, Isle of Man, Japan, Jersey, New Zealand, Republic of Korea, Switzerland, the United Kingdom, and Uruguay.
  - For more information, see the official website of the European Commission, here: [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en)

Except for the countries list above, non-EEA countries do not have the same data protection laws as the United Kingdom and EEA. DDI will, however, ensure the transfer complies with data protection laws and exercise reasonable efforts to keep all personal information secure. Our standard practice is to use standard contractual clauses that have been approved by the European Commission. To obtain a copy of those clauses, see: [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc/standard-contractual-clauses-international-transfers\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc/standard-contractual-clauses-international-transfers_en). If you would like further information, please contact our Data Protection Officer (see “How to Contact Us” below).

**Your Rights Under the General Data Protection Regulation (“GDPR”)** to the extent we to the extent we are processing data subject to GDPR jurisdiction:

Right to Access	The right to be provided with a copy of your personal information (the right of access)
Right to Rectification	The right to require us to correct any mistakes in your personal information
Right to be Forgotten	The right to require us to delete your personal information in certain situations
Right to Restriction of Processing	The right to require us to restrict processing of your personal information—in certain circumstances, e.g. if you contest the accuracy of the data
Right to Data Portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
Right to Object	The right to object:

	--at any time to your personal information being processed for direct marketing (including profiling); --in certain other situations to our continued processing of your personal information, e.g. processing carried out for the purpose of our legitimate interests.
Right Not to be Subject to Automated Individual Decision-Making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, see the guidance from the UK Information Commissioner’s Officer (ICO) on individual rights under the General Data Protection Regulation.

**Your Rights Under the California Consumer Privacy Act (“CCPA”) – to the extent we to the extent we are processing data subject to CCPA jurisdiction:**

Disclosure of Personal Information We Collect About You	<p>You have the right to know:</p> <ul style="list-style-type: none"> <li>• The categories of personal information we have collected about you;</li> <li>• The categories of sources from which the personal information is collected;</li> <li>• Our business or commercial purpose for collecting or selling personal information;</li> <li>• The categories of third parties with whom we share personal information, if any; and</li> <li>• The specific pieces of personal information we have collected about you.</li> </ul> <p>Please note that we are not required to:</p> <ul style="list-style-type: none"> <li>• Retain any personal information about you that was collected for a single one-time transaction if, in the ordinary course of business, that information about you is not retained;</li> <li>• Reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered personal information; or</li> <li>• Provide the personal information to you more than twice in a 12-month period.</li> </ul>
Personal Information Sold or Used for a Business Purpose	N/A
Right to Deletion	Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:

- Delete your personal information from our records; and
- Direct any subprocessors to delete your personal information from their records.

Please note that we may not delete your personal information if it is necessary to:

- Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;
- Debug to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act;
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent;
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us;
- Comply with an existing legal obligation; or
- Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

Protection Against Discrimination	<p>You have the right to not be discriminated against by us because you exercised any of your rights under the CCPA. This means we cannot, among other things:</p> <ul style="list-style-type: none"> <li>• Deny goods or services to you;</li> <li>• Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;</li> <li>• Provide a different level or quality of services to you; or</li> <li>• Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services.</li> </ul> <p>Please note that we may charge a different price or rate or provide a different level or quality of goods or services to you, if that difference is reasonably related to the value provided to our business by your personal information.</p>
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**Keeping Your Personal Information Secure:**

We have implemented commercially reasonable security measures in place to avert personal information from being accidentally lost or used or accessed in an unauthorized manner. We limit access to your personal information to those who have a genuine business need to access it; We limit those processing your information to those who have a genuine business need to process it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality. DDI continually tests its systems and is ISO 27001 certified, which means we follow top industry standards for information security. DDI aligns to the ISO 27701 standard for privacy. DDI also has procedures in place to deal with any reasonably suspected data security breach. DDI will notify you and any applicable regulator of a reasonably suspected data security breach where legally required to do so.

DDI takes industry standard and reasonable precaution to protect our users' information during transmission and upon receipt. When users submit Personal Information via the Sites, their information is protected both online and offline. When you enter sensitive information on our Sites, we encrypt that information using secure socket layer technology (SSL). Additionally, all data is encrypted on disk via hardware encryption.

The servers that store personally identifiable information are in a secure environment in a secure Tier 4 data center. Only employees who need the information to perform a specific job are granted access to personally identifiable information. Those employees are required to respect the confidentiality of your Personal Information.

For Sites where you have a user account, you are solely responsible for maintaining the confidentiality of your username and password. If you believe that confidentiality has been compromised, contact [DataProtectionOfficer@ddiworld.com](mailto:DataProtectionOfficer@ddiworld.com).

### **How to Exercise Your Rights:**

If you would like to exercise any of your rights as described in this Privacy Policy, please:

- Complete a data subject request form available on our website at: <https://corp.ddiworld.com/gdpr/data-request-form-individual>;
- Call us, toll-free, at +1-412-376-6803;
- By email at: [DataProtectionOfficer@ddiworld.com](mailto:DataProtectionOfficer@ddiworld.com);
- Or by postal mail sent to:  
Attn: DDI Data Protection Officer  
Development Dimensions International, Inc.  
1225 Washington Pike  
Bridgeville, PA 15017 USA

Please note that you may only make a CCPA-related data access or data portability disclosure request twice within a 12-month period.

If you choose to contact us directly by email, phone, postal mail, webform, or similar means, you will need to provide DDI with:

- Enough information to identify yourself (e.g., your full name, address, client/user ID, reference number, or IP address);
- Proof of your identity or address (e.g., a copy of your government issued ID, a recent utility bill, or voter registration); and
- A description of what right you wish you exercise and the information to which your request relates.

We are not obligated to make a data access or data portability disclosure if we cannot verify that the person making the request is the person about whom we collected information or is someone unauthorized to act on such person's behalf.

Any personal information we collect from you to verify your identity in connection with your request will be used solely for the purposes of verification.

### **How to File a GDPR Complaint:**

Our Data Protection Officer will strive to resolve any query or concern you raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in the European Economic Area state where you work, normally live, or where any alleged infringement of data protection laws occurred.

#### **Service Announcements:**

On rare occasions it is necessary to send out a service-related announcement. For instance, if access is temporarily suspended to one or more of our Sites for maintenance, an email notification may be generated and sent to end users. Users may not opt-out of these notifications; these communications are informational in relation to the service being rendered and not promotional in nature.

#### **Changes to This Privacy Notice:**

This privacy notice was published on January 15, 2022, and last updated on January 15, 2022.

DDI may change this privacy notice from time to time. When we do, we will post changes on the Sites and other places deemed appropriate, so our users are always aware of what information we collect, how we use it, and under what circumstances, if any, we share or disclose it.

If we are going to use users' Personal Information in a manner different from that stated at the time of collection, we will notify users by posting a notice on the Sites for 30 days or emailing you prior to the change becoming effective.

#### **Choice/Opt-out:**

Users who provide information requested by the Sites, or who continue to use the Sites after having an opportunity to review this Privacy Policy, thereby consent to the terms of this Privacy Policy and to DDI's use of the information it collects as described in this Privacy Policy. Those who do not agree to this Privacy Policy may not use the Sites. Users also have the right to revoke prior consent at which time access to Sites and usage of Services would cease.

#### **Transfer or Assignment:**

Transfer or Assignment in Connection with Business Transfers or Bankruptcy. In the event of a merger, acquisition, reorganization, bankruptcy or other sale of all or a portion of our assets, any user information owned or controlled by us may be one of the assets transferred to third parties. We reserve the right, as part of this type of transaction, to transfer or assign your personal information and other information we have collected from users of the Sites to third parties. Data collected via some Sites, however, belong to our client organizations and would not be considered an asset to be transferred without prior consent. Other than to the extent ordered by a bankruptcy or other court, or as otherwise agreed to by you, the use and disclosure of all transferred user information will be subject to this Policy. However, any information you submit or that is collected after this type of transfer may be subject to a new privacy policy adopted by the successor entity.

**Consent to Marketing:**

By submitting a contact form, or any other form accessible from our public Internet Sites, users consent to DDI emailing them, collecting their personal information, and processing that information in the provision of services and for the purposes of marketing and research. A link is provided with each form to make users aware of their rights and the ways in which their information will be used as referenced in DDI's Data Privacy Policy. Users have the right to revoke this consent at any time.

**Acceptable Use:**

This section applies to the software systems and all related electronic or printed help and documentation accessed via the Sites.

Users are granted non-exclusive, non-transferable, non-sublicensable, revocable permission to access and display the Sites on their computer screens and to generate outputs from the Sites as designed and intended per descriptions in the Sites' relevant documentation. Users acknowledge that DDI will not be liable or held at fault for any performance or operational problems resulting from nonconformance to the published technical specifications necessary for access to the Sites as previously provided to DDI's clients. DDI shall not be liable or held to be in default of performance or operational obligations due to any technical or design problem within the electronic network which compromises users' access to the public Internet.

Neither the Sites, screens within the Sites, nor the hard-copy outputs generated from the Sites may be used by or disclosed to third parties except as may be required in connection with inquiries by government or regulatory authorities.

DDI provides Web-based or Cloud-based applications, virtual reality programs, equipment, assessments, testing, software systems and related tools which may be used by DDI to perform and provide Services ("Tools"). Except as expressly authorized herein, users shall not: (i) copy the Tools in whole or in part; (ii) reverse compile, reverse assemble, or access with intent to "hack" all or any portion of the Tools; (iii) distribute, market, rent, lease, provide access to, or transfer the Software to third parties; or (iv) modify the Tools except as otherwise provided. No license, right, or interest in any DDI trademark, trade name, or service mark is granted hereunder.

For additional information, please read DDI's [Terms and Conditions of Use Agreement](#).

**Protection of Children's Information:**

The Sites do not publish content or collect data that is targeted at children.

**Links:**

Sites can contain links to external sites. Please be aware that DDI is not responsible for the privacy practices of such other sites. We encourage our users to be aware when they leave our Sites and to read the privacy policies of every web site that collects personally identifiable information.

## How to Contact Us:

Please contact DDI at:

- Call us, toll-free, at +1-412-376-6803;
- By email at: [DataProtectionOfficer@ddiworld.com](mailto:DataProtectionOfficer@ddiworld.com);
- Or by postal mail sent to:  
Attn: DDI Data Protection Officer  
Development Dimensions International, Inc.  
1225 Washington Pike  
Bridgeville, PA 15017 USA

## Further Resources:

- [Explore how DDI secures data](#)
- [Visit this page to select the type of marketing emails you'd like to receive from us or to unsubscribe](#)

## Need Extra Help?

If you would like this notice in another format (e.g., audio, large print, braille) please contact us (see: "How to Contact Us" above).