Herrmann International

GENERAL WEBSITE PRIVACY POLICY

Last Updated: 15 December 2014

Description of Herrmann International's Business

Herrmann International (and any reference to Herrmann International shall include Herrmann International's parents, affiliates, and subsidiaries) provides solutions that give people, teams and organizations the skills and tools to increase their thinking agility so they can achieve exponentially higher levels of performance. Herrmann International serves a vast array of for-profit and not-for profit businesses, universities and governmental agencies, departments, and individuals.

This Privacy Policy **("Privacy Policy")** describes the types of information we collect, how we collect the information, how we use the information, how we share or disclose the information, how we store the information, and your choices regarding the use and processing of the information.

This Privacy Policy does not apply to the collection, processing, storage, transfer, and/or disposal of information collected in connection with Herrmann International's HTMS system

Commitment to Privacy

Herrmann International is committed to protecting the privacy and security of all Personal Data **("Personal Data")** collected or received by Herrmann International. Herrmann International strives to conform its privacy practices with applicable international, national, Federal, state and/or local laws and regulations. All references to Herrmann International in this Privacy Policy include Herrmann International's parents, subsidiaries and affiliates.

Herrmann International complies with the United States ("**US**") - European Union ("**EU**") and US–Swiss Safe Harbor Frameworks as set forth by the US Department of Commerce regarding the collection, use and retention of **Personal Data** from EU member countries and Switzerland. Herrmann International has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access and enforcement. To learn more about the Safe Harbor program, and to view Herrmann International's certification page, please visit http://www.export.gov/safeharbor/.

What type of information do we collect?

We collect the following information:

a. First and last names, email address, telephone number(s).
b. Business contact information, including, without limitation, company name, job title, and department.
c. Information on your employer or the company you represent.
d. Information collected through automated means, includes, without limitation, IP address, browser type, operating system, referring URLs, information on actions or activities taken or engaged in on a website, and dates and times of website visits.

If you provide us your email address, you agree to allow us to correspond with you and send you information periodically.

How do we collect information?

Information provided by you:

We collect the following Information submitted or provided by you:

a. Through or in connection with Herrmann International's corporate website(s), including, without limitation, www.herrmanninternational.com;
b. Through or in connection with business meetings with actual or potential customers or clients;
c. Through or in connection with promotions, meetings, events, and/or trade or industry shows or conferences sponsored by, hosted by, or attended by Herrmann International and/or Herrmann International's employees, representatives, and/or agents; and
d. Through telephone calls, email communications, and/or other forms of communication.

Herrmann International may collect information, including, without limitation, **Personal Data**, from third parties, including, without limitation, industry conference or event organizers or sponsors. We may use the information collected from such third parties for various purposes, including, without limitation, sending you emails or other communications as described herein. In the event you receive such communications you will have the opportunity to opt-out of receiving communications from us.

Information collected via Cookies:

Our website uses "cookies." Cookies are small text files that a website transfers to your computer's hard drive. We may use cookies to measure traffic patterns, personalize content, control security and to help us make our site more useful. The cookies we use do not supply **Personal Data**, but may identify your OS version, browser and Internet specifications. You have the choice to accept, reject or be notified when a site sets a cookie by configuring your browser preferences.

Information automatically collected and stored in Log Files:

Herrmann International's websites may automatically gather and store certain information in log files, including, without limitation, data available from your web browser, including, without limitation, IP Address, browser type, Internet service provider, referring/exiting pages, operating system, date/time stamp and click stream data.

How We Use the Information that We Collect.

We may use information, including, **Personal Data**, to:

a. Provide, administer, and communicate with you about Herrmann International's products, promotions, services, events (e.g., webinars, etc.), newsletters, and industry expertise/knowledge (e.g., whitepapers, articles, etc.);
b. Create, supplement, and update Herrmann International's directories and records for actual and/or potential suppliers, customers, and/or clients;
c. Protect against and prevent fraud, claims, liabilities, and to manage risk exposure;
d. Respond to inquiries and requests;
e. Operate, evaluate, conduct, and improve Herrmann International's business (including, without limitation, to complete transactions for Herrmann International's products and/or services, to improve Herrmann International's current products and/or services, to develop new products and/or services, etc.);
f. Process and manage opt-out or unsubscribe requests;
g. Comply with applicable laws, regulations, codes, and industry standards and practices;
h. Conduct marketing and research activities including, without limitation: (i) contacting you to participate in customer satisfaction surveys or questionnaires via telephone, email, or otherwise, and (ii) soliciting your opinions or feedback on Herrmann International's business activities, including, without limitation, current and future products and services;
i. Create and send targeted communications to you regarding you or your company's transactions with Herrmann International and/or the profile for your company;
j. Respond to a subpoena or an order of a court or government agency;
k. Establish, exercise, or defend legal claims, including, without limitation, to protect Herrmann International's rights and/or property; and
i. Evaluate your interest in employment and contact you regarding possible employment opportunities with Herrmann International and/or any company within the Herrmann International group of companies.

In addition to the above, Herrmann International may use information collected or received by Herrmann International as set forth in this Privacy Policy.

In the event that you provide Herrmann International with any feedback, suggestions, and/or comments regarding Herrmann International's business activities, including, without limitation, regarding current and/or future products and/or services, Herrmann International may use, apply, and implement such feedback, suggestions, and/or comments, at Herrmann International's discretion, and without notice to you, without any consent or approval from you, without any compensation to you, and/or without any attribution or credit to you, and you hereby irrevocably assign and transfer to Herrmann International all right, title, and interest in and/or to any such feedback, suggestions, and/or comments.

No Personal Data incorporated in or associated with comments, suggestions or feedback will be used or shared except in accordance with this Privacy Policy.

How do we share your information?

Herrmann International does not sell your information and does not disclose your information, except as described in this Privacy Policy or as otherwise consented to by you.

We may share information, as follows:

a. Within the Herrmann International group of companies (with Herrmann International's parents, subsidiaries, and affiliates) and the directors, managers, officers, employees, consultants, and agents of these companies, subject to the terms of this Privacy Policy or as otherwise disclosed to you at the time of the collection of the information or as subsequently consented to by you.
b. To service providers who are performing services on our behalf, whether engaged directly by Herrmann International or engaged by a third party. The service providers are authorized to use and disclose the information only as necessary to perform and provide the services for which they were engaged.
c. If we are required to do so pursuant to applicable laws or legal or court process; or (ii) when we believe disclosure is necessary to prevent harm or financial loss, or in connection with an investigation of actual or suspected fraud or illegal activity.
d. In the event we sell or transfer all or a portion of our business or assets. Should such a sale or transfer occur, we will shall require the other party (e.g. the surviving or resulting entity in a merger, or the acquiring entity in an acquisition) to agree in writing to use, protect, and maintain the security, integrity, and confidentiality of the transferred **Personal Data** in accordance with this Privacy Policy.
e. As otherwise permitted pursuant to this Privacy Policy or otherwise authorized by you.

Where is Information Stored?

All information is stored on servers and systems located in the United States, which servers are licensed, owned, and/or maintained by Herrmann International. Herrmann International complies with the US-EU and US–Swiss Safe Harbor Frameworks as set forth by the US Department of Commerce regarding the collection, use and retention of **Personal Data** from EU member countries and Switzerland. Herrmann International has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access and enforcement. To learn more about the Safe Harbor program, and to view Herrmann International's certification page, please visit http://www.export.gov/safeharbor/.

What Security Measures Has Herrmann International Implemented?

Herrmann International maintains appropriate technical, administrative and physical safeguards to protect information received or collected by Herrmann International. Herrmann International reviews, monitors and evaluates its privacy practices and protection systems on a regular basis. Notwithstanding the foregoing, transmissions over the Internet and/or a mobile network are not one hundred percent (100%) secure and Herrmann International does not guarantee the security of transmissions. Herrmann International is not responsible for any errors by individuals in submitting **Personal Data** to Herrmann International.

How can I opt-out?

You may opt-out by clicking on the unsubscribe link contained in any e-mail communication received from or about Herrmann International or by contacting us as set forth below.

How Can You Access Your Information?

You may access information we collect from or about you in order to review, correct, or delete such information by:

- Sending an email request to: info@hbdi.com
- Sending an email request to: privacy@hbdi.com;
- Regular mail, postage pre-paid to:

  Privacy Compliance Officer
  Herrmann International
  794 Buffalo Creek Road
  Lake Lure, NC 28746
  ATTN: Legal

Who can I contact with questions or complaints about this Privacy Policy?

***Questions or Complaints Generally**:*

If you have any questions or complaints regarding Herrmann International's privacy practices and/or this Privacy Policy or want to communicate an opt-out request to Herrmann International, or want to exercise your rights to access, review, correct, delete or object to the processing of your information, please contact us via email at privacy@hbdi.com. Herrmann International's Legal Department is responsible for the organization's compliance with this Privacy Policy.

***Questions or Complaints by Citizens of EU Member Countries**:*

Herrmann International complies with the US-EU Safe Harbor Framework and US-Swiss Safe Harbor Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of **Personal Data** from European Union member countries and Switzerland. Herrmann International has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view our certification page, please visit http://www.export.gov/safeharbor/

In compliance with the US-EU and US-Swiss Safe Harbor Principles, Herrmann International commits to resolve complaints about your privacy and our collection or use of your **Personal Data.** European Union or Swiss citizens with inquiries or complaints regarding this Privacy Policy should first contact (Herrmann International) at:

Privacy Compliance Officer
Herrmann International
794 Buffalo Creek Road
Lake Lure, NC 28746
Email: privacy@hbdi.com

Herrmann International has further committed to refer unresolved privacy complaints under the US-EU and US-Swiss Safe Harbor Principles to an independent dispute resolution mechanism, the BBB EU SAFE HARBOR, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed by Herrmann International, please visit the BBB EU SAFE HARBOR web site at www.bbb.org/us/safe-harbor-complaints for more information and to file a complaint.

Updates to this Privacy Policy.

This Privacy Policy may be updated periodically and without prior notice to you to reflect changes to Herrmann International's practices and procedures set forth herein. In the event of any updates or changes to this Privacy Policy, Herrmann International

will post a prominent notice on Herrmann International's website(s) to notify you of any significant changes.