

### Introduction

**This Fact Sheet provides information on GP Strategies information technology security practices and the guidance regimes we use to achieve required data privacy security and related records management practices. Some of this information is also provided in our Frequently Asked Questions documents and other materials.**

This Fact Sheet does not cover the practices of any third parties or their services, including any social networking platforms for the sites of business clients who use GP Strategies services to collect information from their customers. For information about third party security and privacy practices, please consult their privacy policies. The term “sites” used herein includes web and social media sites.

When we use the term “may” herein with a description of actual collection or potential collection use terminology it means that we either do or might in the future conduct this particular privacy data collection activity or we may install a particular data capture capability in some, none or all cases or on some, none or all sites. We can currently conduct a particular data privacy collection activity in some cases now and we choose not to collect or we may do it in the future as technology allows or if needs change. If needs change we will update our informational materials and seek user permissions if appropriate because the originally intended purpose has changed. However, our practice is to follow the principles of law and minimize the categories and quantity of privacy data we collect.

### English Language for Inquiries

All inquiries about these topics should be made in English to help expedite the process for response.

### EU-U.S. Privacy Shield Program

GP Strategies is an approved participant, by our voluntary compliance initiative, in the EU-U.S. Privacy Shield Framework. All of our affiliated companies are covered by our participation in the EU-U.S. Privacy Shield Framework. GP Strategies is committed to subjecting all personal privacy data received from European Union (EU) member countries, the United Kingdom and Switzerland, respectively to the Framework’s applicable Principles. To learn more about the Privacy Shield Framework visit the U.S. Department of Commerce’s Privacy Shield List. To read about GP Strategies statement of adherence to Privacy Shield for data privacy purposes go to the GP Strategies web site at [www.gpstrategies.com](http://www.gpstrategies.com)

### General Data Protection Regulation of the European Union

GP Strategies uses the General Data Protection Regulation (GDPR) of the European Union (EU) and the European Economic Area (EEA) as its guiding companywide compliance threshold for managing privacy data for employees, clients, site visitors and vendors. GP Strategies has a Data Privacy and

Records Management Program Committee that provides oversight and adheres to the security guidance in the GDPR to develop GP Strategies security program privacy safeguards. GP Strategies also complies with the privacy laws of non-EU countries where we do business when we are aware that they differ from the GDPR.

### **Privacy Data Dispute Resolution**

GP Strategies will be cooperative with privacy data dispute resolution using Privacy Shield for the EU or the UK post Brexit or with regimes requested by the data protection authorities-information commissions and the information commissioners offices (ICO) of the EEA countries. GP Strategies has further committed to cooperate with EU data protection authorities (DPAs) with regard to unresolved complaints concerning privacy data transferred outside the EU in the context of the employment, vendor and customer privacy data relationships.

### **Data Protection Officers**

As required by the GDPR, GP Strategies has appointed data protection officers (DPO) for compliance purposes to include ombudsman availability to employees for inquiries about data privacy practices.

### **Standards for Information Technology Security**

GP Strategies adheres to the ISO (International Standards Organization) security standard 27001&2 to direct its information technology security practices and inform our security policy development.

Where applicable we augment our ISO Information Security Management System framework with other standards to include the U.S. National Institute of Standards and Technology (NIST), UK Cyber Essentials qualifications for certification and the Payment Card Industry, Data Security Standard (PCI-DSS) to name a few examples of the dozen or so standards that GP Strategies uses as reference for compliance.

### **Recipients of Personal Data Collected**

With respect to GP Strategies corporate sites, all data collected is stored in secure applications with access limited for employee services and to meet business operations needs. No personal data is shared with third parties other than services providers acting as GP Strategies contracted agents. Our processors of employee, vendor, client and site visitor data are contractually required to meet the same security standards that GP Strategies must meet for all of these same audiences and partners.

## **European Data Subjects and All GP Strategies Data Subjects Rights**

The Privacy Shield, European Economic Area (EAA) General Data Protection Regulation (GDPR) and similar privacy data protection laws, standards and guidance of the U.S. states and the Asia Pacific Economic Cooperation (APEC) forum provide European citizens, and all GP Strategies data privacy subjects around the world, the following rights which GP Strategies supports:

- Right to be informed;
- Right of access;
- Right to rectification;
- Right to erasure;
- Right to restrict processing;
- Right to portability;
- Right to object.

To review additional information about your rights, see our web and social media sites Frequently Asked Questions (FAQ) or the employee FAQ information documents about protections, choices and to make changes for use of your personal information.

## **Personal Information Disclosure Requests by Public Authorities**

In certain situations, GP Strategies may be required to disclose personal data: a) in response to lawful requests, such as to comply with a subpoena or other legal process, by public authorities including national security and law enforcement; b) in the event that GP Strategies files for bankruptcy; c) to protect our rights; d) to protect your safety or that of others in an emergency; e) to investigate fraud, f) to respond to a government request or, g) in the event of a merger or acquisition.

## **Protection, Retention, Deletion and Security of your Personal Information**

The security of your and the personal information of all of us is important to GP Strategies. When anyone enters sensitive information (such as log in credentials), we encrypt the transmission of that information using secure transport layer security (TLS). We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. This includes encryption in transit; strict access controls; firewalls and intrusion detection systems; recommended hardening and patching procedures; and malware protection.

No method of data transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security. GP Strategies retains personal information it collects as a data controller consistent with its internal, contractual and legislated data retention policies and then deletes that information based on our records management schedule. Personal information will eventually be deleted over a 2-7 year period based on our records storage schedules unless it is in one of the very few legislated “forever” files of a corporation record.

## **Links to 3rd Party Sites**

Our sites include links to other websites, social media sites, mobile sites, and/or mobile applications whose privacy practices may differ from those of GP Strategies. If you leave a GP Strategies site and submit personal information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any site you visit.

## **Information We Collect On Behalf of Our Clients**

GP Strategies acts as a service provider for each of our clients, in that we provide our services for the benefit of the client. Many of our clients use GP Strategies owned, hosted and/or administered sites or we use the client's owned data collection products (systems, software) and services to gather information for them about their own employees, customers and visitors to their sites and digital properties. Each client instructs us as to what types of personal data it would like us to collect on its behalf ("Client Data").

GP Strategies will retain personal data we process on behalf of our clients for as long as needed to provide services to our clients, and as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. GP Strategies retains Client Data, including any personal data, we process on behalf of our clients in accordance with their or our data retention policy, whichever is governing in the contract. GP Strategies does not sell personal privacy information.

If you are a customer of one of our clients and would no longer like to be contacted by one of our clients that uses our service, please contact the client that you interact with directly. We will facilitate that contact if possible or to the extent as allowed by contract or law.

GP Strategies may transfer personal information to partner companies that help us provide our service to our clients. Transfers to subsequent third party partners are covered by the contractual service agreements with our clients and those or substantially similar or more stringent requirements are installed in our subcontractor (processors) contractual agreements.

GP Strategies acknowledges and supports that everyone has the right to access their personal information. GP Strategies often has no direct relationship with the individuals whose personal data it processes. An individual who seeks access, who seeks to correct, amend, delete inaccurate data, or who seeks to withdraw consent to further contact should direct his/her query to the applicable GP Strategies client. GP Strategies will provide referral information to the client for the inquirer if requested. If the client requests, GP Strategies to remove the data of a particular data subject, we will respond to their request within 30 days.

We treat Client Data as the property and confidential information of the applicable GP Strategies client. We reserve a limited right to disclose any collected data as required by law, a valid court order, for emergency response purposes or other legal request from a governmental authority. Other than under such a limited right, we do not share information collected for one client with our other clients or with any third party, nor do we sell such information.

GP Strategies follows our clients' instructions on cookie placement. To control the placement of cookies set while visiting our clients' web sites, please consult these clients' privacy statement and cookie settings on their site.

### **Information We Collect About Site and Service Users**

GP Strategies, in the course of our work, may obtain information from several sources about site and services users. Information we collect may be in the form of personal information or anonymized data. Anonymized data may be in the form of aggregate data. Aggregate data is information we collect about a group or category of services or users from which individual user identities have been removed. In other words, no personal information is included in aggregate data. Aggregate data helps us understand trends in our users' needs so that we can better consider new features or otherwise tailor our products and services. Data privacy laws nor our internal policies restrict or limit our collection and use of aggregate data.

### **Information You Provide To Us – Minimization Principle**

As a compliance philosophy GP Strategies makes every effort to apply a data minimization approach in our privacy data gathering and storage activities in accordance with the GDPR. We do collect and hold some personal information you give us as described in our policies and information materials. These are the general types of information we may collect from you:

#### **Registration and Profile Information**

We try to gather only the most necessary information for the involved inquiry or purpose. When you enter or register to use our site, our services, to receive information, to participate in our events, and create or update your site forum profiles, we may collect various kinds of information about you. For example, we may collect: your name; postal address; phone number; fax numbers and email address; your log-in ID and password; your title; company; and other event specific profile information you provide; demographic information; and information linked with your profile such as comments you may post.

#### **Information We Automatically Collect**

When you visit our site or use GP Strategies site services, as do many companies, some information is collected and recorded automatically such as your computer's operating system, Internet Protocol (IP) address, access times, browser type and language, and the website you visited before our corporate sites, so we are aware of transfers and linking for security due diligence (blocking and enhancing) of our site and to protect you the user, is logged automatically and stored in log files. We also collect information about your usage and activity on our corporate sites. We may tie your IP address to information we automatically collect on our corporate sites. We may also tie information we automatically collect with personal information, such as your login ID and information you give us for a registration. We use our own products, and products of third parties acting on our behalf, to analyze, optimize, securely protect and improve our site.

GP Strategies will also collect information on your usage to ensure the security of the data we collect on behalf of our clients. You cannot opt-out of this collection and processing as it is necessary to ensure the security of the service we provide for our sites and for our clients. This automated information technology (IT) collection activity is allowable under the GDPR as a security measure to protect all users and the security viability of the IT system as a whole.

We use cookies to collect information allowing for analytics, user experience and session tracking, as well as video use tracking. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited.

GP Strategies may also use device-recognition technologies combined with other identifiers to create cross-browsers and cross-devices identities to provide you with better services and security.

### **Information We Obtain from Other Sources**

GP Strategies may collect information about you from third party sources and services. We may buy or lease contact, marketing, and demographic data from brokers. GP Strategies may also access certain profile information such as friends, profile picture, etc. from social networking platforms and services that you use on or to interact with GP Strategies corporate sites. We may combine that third party information with information we collect directly from you.

### **Use of Cookies – Practices and Procedures**

GP Strategies uses cookies for a variety of purposes such as remembering your preferences, measuring your activity on GP Strategies' websites, mobile sites and mobile applications ("sites") or optimizing your user experience. Disabling cookies on your internet browser will stop tracking of any part of your visit to pages within the site. All traffic (transferral of files) between the site and your browser is encrypted and delivered over [HTTPS](https://).

Please also review our FAQs and Privacy Policy statements for more information about GP Strategies privacy practices.

## Cookie Settings

The types of cookies GP Strategies and others may place on your device are described below.

- GP Strategies will read or set only the types of cookies that are strictly necessary or specifically allowed by your browser preference settings.
- GP Strategies only places cookies that set your preferred language, deliver specific content based on visit history, and give access to various sections of the website.
- Cookies set by our sites will remain on your device but GP Strategies will not access or use those non-strictly-necessary cookies. You may remove them using functionality provided by your browser. Please note that cookies are specific to the browser or device you use, as well as to the domain, and you will therefore have to configure your preferences again if you change your browser or device, or visit a different domain.
- Any specific questions regarding these cookie settings may be sent to [gpwebmaster@gpstrategies.com](mailto:gpwebmaster@gpstrategies.com)

## Cookie Types You should Be Aware of as You Move from Site To Site

- **Strictly Necessary Cookies** – These cookies are necessary to facilitate basic site functionality, such as:
  - remembering log-in state and provide security
  - remembering transaction in progress
- **Functional Cookies** – These cookies facilitate additional site features for enhanced performance and functionality such as:
  - remembering preferences,
  - allowing social interactions,
  - analyzing usage for site optimization providing custom content
  - allowing third parties to provide social sharing tools
  - serving images or videos from third party websites

- **Social Media Cookies**

- Serving images or videos from third party websites
- These cookies allow you to share what you have been doing on a site on social media such as Facebook and Twitter. These cookies are not within our control. Please refer to these providers respective privacy policies for how their cookies work.
- These cookies allow you to share what you've been doing on a site. If you want to delete any cookies that are already on your computer, please refer to the help and support area on your internet browser for instructions on how to locate the file or directory that stores cookies.
- Please note that by deleting our cookies or disabling future cookies you may not be able to access certain areas or features of our sites. To find out more about cookies please visit: [www.allaboutcookies.org](http://www.allaboutcookies.org) or see [www.youronlinechoices.eu](http://www.youronlinechoices.eu) which contains further information about behavioral advertising and online privacy.

### **Use of Web Beacons**

Some of our web pages may contain electronic images known as web beacons (sometimes known as clear gifs) that allow us to count users who have visited these pages. Web beacons collect only limited information which includes a cookie number, time and date of a page view, and a description of the page on which the web beacon resides. We may also carry web beacons placed by third party advertisers. These beacons do not carry any personally identifiable information and are only used to track the effectiveness of a particular campaign.

### **Social Media Widgets**

GP Strategies corporate sites can include certain social media features, such as the Facebook button. These features may collect your IP address, may collect which page you are visiting on our sites, and may set a cookie to enable such feature to function properly. Social media features are either hosted by a third party or hosted directly on our sites. Your interactions with these features are governed by the privacy policy of the company providing it.

### **Blog Information**

Should you choose to add a comment to any posts that we have published on our sites for example in a blog, the name and email address you enter with your comment will be saved to the site's database, along with your computer's IP address and the time and date that you submitted the comment. This information is only used to identify you as a contributor to the comment section of the respective blog post and is not passed on to any of the third party data processors. Only your name will be shown on a site that is public-facing.

Your posted comment(s) and its associated personal data will remain on this site until we see fit to either 1.) remove the comment, or 2.) remove the blog post. Should you wish to have the comment and its associated personal data deleted, please email us listed with your contact information using the email address that you commented with.

If you are under 18 years of age we request you obtain parental consent before posting a comment on our blog and sites.

NOTE: You should avoid entering personally identifiable information to the actual comment field of any blog post comments that you submit on this site.

### **Contact Forms and Email Links**

Should you choose to contact us using a contact form on our sites or an email link, the data you supply will be stored in our customer relationship management database or passed on to be processed by a third party data processor(s). We do retain information from data requests in our customer relationship management system. Collated and transferred data is encrypted before being sent across the internet.

### **Data Centers**

GP Strategies uses data centers on more than one continent to secure and preserve data. Some of the data centers more notable security features are as follows:

- Security fence and perimeter barriers
- Blast proof anti-intruder shielded external windows and doors
- Proximity access locks on all external and internal doors
- Interlocked man-trap doors with scanners to gain access into data floors
- Server cabinets have locked doors (no open racks)
- Perimeter and internal IP CCTV system monitored 24x7
- 24x7 on-site security guards with static and mobile patrols
- All on-site personnel are security vetted
- Only authorised security cleared staff, clients and approved visitors are allowed into the facility

### **Our Third Party Data Processors**

We use a number of third parties to process personal data on our behalf. These third parties have been carefully chosen and all are contractually required to comply with privacy legislation where applicable.

## **Data Breaches**

Data breach reporting laws vary from country to country and state to state. We will follow the applicable laws and definitions. We will report any confirmed unlawful material data breach of unencrypted personal information of our site's database or the database(s) of any of our third party data processors to any and all relevant persons and authorities in the manner prescribed by applicable law.

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