

**Force Management Privacy Policy**  
**Regulation Compliant Alternate Version**

Last modified: March 21, 2018

**Introduction**

We respect your privacy and are committed to protecting it through our compliance with this Policy. This Policy describes the types of information we may collect from you or that you may provide when you visit the website forcemanagement.com (our “Website”) or when you use our application for your mobile device (our “Application”), and our practices for collecting, using, maintaining, protecting and disclosing that information. We refer to our Website and our Application cumulatively as our “Platform.”

This Policy applies to any information that we collect on the Platform, including any information in any emails, posts, texts and other electronic messages between you and the Platform and any information about you transferred to the Platform from other websites. This Policy also applies to any related information that we collect about you offline but that will be processed by automated means using the Platform. This Policy does not apply to any other information that we collect by any means.

**Please read this Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, you can choose not to use our Platform. By accessing or using our Platform, you agree to this Policy. This Policy may change from time to time. Your continued use of the Platform after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.**

**Information We Collect About You and How We Collect It**

We may collect several types of information from and about users of our Platform, including information by which you may be personally identified, such as your name, postal address, email address, social profile information, telephone number and photograph. In addition, if we sell any goods or services on our Platform, we may collect information required for the payment for goods or services, including credit card numbers, security codes and other financial information. All of this information is cumulatively referred to in this Policy as “Personal Information.”

The information we collect on or through our Platform may include information that you provide by registering to use our Platform, using our services, posting material, requesting further services or reporting a problem with our Platform. We will also retain records and copies of your correspondence or information you provided to us through a form (including email addresses), if you contact us.

As you navigate through and interact with our Platform, we may automatically collect certain traffic data and usage information to help us manage our content and improve your use of the Platform. This may include information about your equipment, your IP address and your browsing actions and patterns when you visit our Platform, including the referring and exit pages. The technologies that we use for this automatic data collection may include cookies that are stored on your computer, small embedded electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) and other types of embedded code on the Platform that permit us to count users and obtain other related Platform statistics (for example, recording the popularity of certain Platform content and verifying system and server integrity).

We may obtain Personal Information and other data from integrated third-party applications, programs and/or devices that you may elect to use in connection with the Platform (“Programs”). You should review the third-party privacy policies applicable to information transferred to us from Programs, since they may allow different or broader uses of that information than would be permitted by our Policy.

### **Legal Basis for Processing**

We have the legal right to use your Personal Information in the ways described in this Privacy Policy based on your consent, or on the need to use the Personal Information to provide you with goods or services that you request, or for the legitimate purposes of furthering our existing relationship with you or preventing fraud. Accordingly, you have a contractual rather than a statutory obligation to provide such information. If you do not provide such information, you may be unable to use our Platform and we may be unable to provide any goods or services that you request.

### **How We Use Your Information**

We use information that we collect about you or that you provide to us, including any Personal Information, to present our Platform and its contents to you, to provide you with information, products or services that you request from us, and to fulfill any other purpose for which you provide the information. If you purchase products or services, we may transmit your Personal Information to payment processors. We may also use your Personal Information to notify you about changes to our Platform or any products or services we offer or provide through it and to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection. We may also use the information that you provide in any other way that we describe when you provide the information and for any other purpose with your consent.

We may use your Personal Information for any permitted [marketing purposes](#). This may include (1) processing and analyzing collected information to create other descriptive or predictive data; (2) transferring collected information, processed information, or descriptive or predictive data to another user, website or other third party; (3) allowing participation in interactive features

of the Platform; (4) using User Contributions to rate features, products or services; or (5) creating affinity-based groups of users (6) using collected information to inform you of upcoming marketing events and new published content.

We retain your Personal Information while you are using the Platform to improve your use of the Platform. Once you are no longer using our Platform, we will store your Personal Information for so long as we may need it to answer questions about the products or services that we provided, or to comply with the recordkeeping requirements of applicable law.

### **Disclosure of Your Information**

We may disclose your Personal Information for any permitted [marketing purposes](#). This may include (1) disclosing collected information, processed information, or descriptive or predictive data to another user, website or other third party; (2) disclosing User Contributions to rate features, products or services; or (3) creating affinity-based groups of users. We may also disclose your Personal Information for any other purpose disclosed when the information is provided, and for any other purpose with your consent.

We may pseudonymize some of your Personal Information so that it can no longer be attributed to you without the use of other separately maintained information, or convert or combine some of your Personal Information into de-identified or aggregated data that does not disclose any of the Personal Information of any individual user. We may disclose any such pseudonymized, de-identified or aggregated data without restriction.

Some of the information that we collect from cookies, web beacons or other embedded code relates to your personal use of the Platform and allows us to store information about your preferences, speed up your searches and recognize you when you return to our Platform. Other information that we collect from cookies, web beacons or other embedded code is not tied to your Personal Information and enables us to estimate our audience size and usage patterns. This traffic data may be shared with third parties without restriction.

We may disclose Personal Information to our subsidiaries and affiliates and to any contractors, service providers and other third parties who need to know such information to support our permitted uses of Personal Information. We may disclose such Personal Information to a buyer or other successor to our business in the event of a sale of equity or assets, reorganization, merger or a similar corporate transaction, and any due diligence review with respect to any such proposed transaction.

We may also disclose your Personal Information to comply with any court order, law or legal process, including to meet national security and law enforcement requirements and to respond to any government or regulatory request or audit, and to enforce or apply our Terms of Use, including for billing and collection purposes, or if we believe disclosure is necessary or appropriate to protect the rights, property or safety of our customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

### **Social Media Sites and Widgets**

If you visit the Platform through Facebook or a similar social media site, certain information about you will be transferred to the Platform, and the fact that you have logged onto the Platform and some of that transferred information may be available to other users of the social media site. That information may be subject to the privacy policies of any such social media site, and you should review those policies before using a social media site to log onto the Platform. Any such transferred information will otherwise be subject to the terms of this Policy.

You may be able to use social media widgets such as the Facebook “Like” button on the Platform. These widgets will collect your IP address and identify which page you are visiting on the Platform and make your preference information available to third parties. The information collected by such widgets is controlled by third-party privacy policies.

### **Use of Personal Information for Marketing Purposes**

We may use your Personal Information to provide you with promotional information about our own products and services. We may use your Personal Information for our tracking purposes, but only to the [extent described below](#):

We may use and disclose the information we have collected from you to enable third parties to display targeted third-party advertisements on our Platform. We may disclose the information we have collected from you to third parties for their tracking purposes, but only to the [extent described below](#).

### **Tracking**

Tracking involves the use of cookies, web beacons, or other embedded code or tracking technologies to collect, analyze and store information on a user’s behavior over time on multiple sites, including information on the sites visited, products viewed, products purchased and other online interactions. Tracking information can be used to enable companies to make interest-based (behavioral) advertising available to users on multiple sites that they visit.

We may collect Personal Information about your online activities over time and across third-party sites for tracking purposes when you use our Platform or use our services. In addition, other parties, including third-party advertisers, ad networks, ad servers, Internet providers and mobile device providers may use cookies, web beacons, or other embedded code or tracking technologies to collect Personal Information about your online activities over time and across third-party sites when you use our Platform or our services. We do not control these third parties’ tracking technologies or how they may be used. If you have any questions about an advertisement, you should contact the responsible advertiser directly.

We honor do not track signals and do not track, plant cookies, or use advertising when a Do Not Track (DNT) browser mechanism is in place.

## **Choices About How We Use and Disclose Your Information**

You have certain choices regarding the Personal Information you provide to us. You can set your browser to refuse all or some browser cookies. If you disable or refuse cookies, some parts of the Platform may then be inaccessible or not function properly.

If you do not wish to have your Personal Information used by us to promote our own or third parties' products or services, or if you do not want us to share your Personal Information with third parties (including for promotional or direct marketing purposes, such as delivering advertisements according to our advertisers' target-audience preferences), you can opt out by sending us an email stating your request to [privacy@forcemanagement.com](mailto:privacy@forcemanagement.com). For this opt-out to function, you must have your browser set to accept browser cookies. If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions. Your opt-out would not apply to disclosure to a third party that is acting on our behalf and under our instructions in support of our permitted uses of your Personal Information.

## **Users Outside of the United States**

**Our Platform is hosted in the United States and our services are provided from the United States. It is possible that certain information will be stored on servers in multiple other countries on the “cloud” or other similar distributed hosting platforms. If you are a resident of any country other than the United States, please note that by providing your Personal Information to us, you are consenting to the transfer of your Personal Information to the United States and other jurisdictions as indicated above, and to our use and disclosure of your Personal Information in accordance with this Policy.**

If you are a resident of the European Union, please note that the EU has determined that the laws of the United States do not provide adequate protection for your Personal Information. Accordingly, we are transferring your Personal Information from the EU to the United States based on your consent, or our need to use your Personal Information to provide goods or services that you order, and subject to the following additional protections:

- If we intend to disclose your Personal Information to any third party that will carry out processing on our behalf, we will enter into a contract with that third party that provides that your Personal Information may be processed only for limited and specified purposes consistent with the consent that you have provided to us, and that the third party must provide the same level of protection for your Personal Information that we are obligated to provide under this Policy while it is processing your Personal Information.

- If your Personal Information is being processed by automated means, you have the right to obtain a copy of your provided Personal Information, together with certain additional Personal Information that we have generated as a result of your use of our services, in a structured and commonly used and machine-readable format, and to transfer such Personal Information to another service provider. Upon your request, we will transfer that Personal Information directly to another service provider if it is feasible for us to do so.
- If we are processing your Personal Information based on your consent, you may withdraw that consent at any time.
- You may restrict our use of your Personal Information, by sending us an email stating your request to [privacy@forcemanagement.com](mailto:privacy@forcemanagement.com) if you have contested the accuracy of that information, or if the processing is unlawful or you need the information to establish, exercise or defend a legal claim. We will then store your Personal Information and process it only with your consent, or to establish, exercise or defend a legal claim or to protect the rights of others. The restriction with respect to information claimed to be inaccurate would end if we verify the accuracy of that contested information.
- Some of the information that you provide to us may be sensitive information related to your racial or ethnic identity, political opinions, religious or philosophical beliefs, trade union membership, health (including genetic and biometric data), sex life or sexual orientation (“Sensitive Information”). We will not otherwise use or disclose any of your Sensitive Information without your express consent, subject to certain limited exceptions. Should we wish to make any other use or disclosure of your Sensitive Information, we will notify you by email and request that you authorize such use or disclosure by responding to the email with your express consent.
- We may create profiles to analyze or predict your performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements. However, we do not make any decision about you that would have legal consequences or similarly significant affects for you based solely on automated decision-making, including the use of profiles.

- Upon our receipt of your request by email at [privacy@forcemanagement.com](mailto:privacy@forcemanagement.com) and our verification of your identity, we will advise you whether or not we are processing Personal Information concerning you and, if so, we will provide you with a copy of your Personal Information being processed and certain information about the nature and purposes of the processing. If your Personal Information is used for automated decision-making, we will provide you with information on the logic being used and the types of decisions being made. You may correct any such Personal Information that is inaccurate or incomplete.
- Upon your request, we will erase any of your Personal Information that is no longer needed for the purpose for which it was collected, or that is being used for direct marketing purposes, or if our use is based on your consent and you withdraw that consent.
- Our Platform may be used by children in the European Union between the ages of 13 and 16 only with parental consent. If we learn we have collected or received Personal Information from a child in the European Union under the age of 16 without verification of parental consent, we will delete that information. In addition, if we have collected Personal Information from any child in the European Union to provide goods or services to that child for a fee, we will erase the Personal Information of that child upon request.
- If we are using your Personal Information on the basis of your consent, and we change our Policy to permit any use or disclosure of your Personal Information that is materially different than the uses for which it was originally collected or subsequently authorized by you, we will obtain your consent before we make such further uses of your [Personal Information](#).

If you have a complaint about our compliance with this Policy, you may contact our privacy monitors at [privacy@forcemanagement.com](mailto:privacy@forcemanagement.com). If you are not satisfied with our response, you will have the right to lodge a complaint with the Supervisory authority in your country of residence in the EU.

### **Your California Privacy Rights**

If you are a California resident, you may obtain certain information regarding our disclosure of your Personal Information to third parties for their direct marketing purposes. To make such a request, please send an email to [privacy@forcemanagement.com](mailto:privacy@forcemanagement.com).

### **Accessing and Correcting Your Information**

You can review and change certain portions of your Personal Information that we retain by notifying our privacy monitors at [privacy@forcemanagement.com](mailto:privacy@forcemanagement.com). We may not be able to delete

your Personal Information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect. You will have additional rights if you are a [resident of the European Union](#).

### **Children**

Our Platform is not intended for children under 13 years of age, and no one under age 13 may provide any information to this Platform. We do not knowingly collect personal information from children under the age of 13. If you are under age 13, do not use or provide any information on this Platform, make any purchases through this Platform, use any of the interactive or public comment features of this Platform, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or username you may use. If you believe we might have any information from or about a child under age 13, please contact us at [privacy@forcemanagement.com](mailto:privacy@forcemanagement.com).

### **Data Security**

We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration and disclosure. All information that you provide to us is stored on our servers behind firewalls, and certain Personal Information will be encrypted using secure socket layer (SSL) technology.

Unfortunately, the transmission of information over the Internet is not completely secure. Although we have implemented security measures that we think are adequate, we cannot guarantee the security of your Personal Information transmitted to our Platform. Any transmission of Personal Information is at your own risk. We are not responsible for the circumvention of any privacy settings or security measures contained on the Platform.

### **Changes to Our Privacy Policy**

We post any changes we make to our Policy on this page. If we make material changes to how we treat our users' Personal Information, we will notify you through a notice on the Platform home page.

The date this Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date, active and deliverable email address for you, and for periodically visiting our Platform and this Policy to check for any changes.

### **Contact Information**

To ask questions or comment about this Policy and our privacy practices, contact us at:  
**privacy@forcemanagement.com**