

# Privacy Policy

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

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

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

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## Personal information we collect

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

## Site users

During your visit to one of our Sites, Vistage collects personal information such as:

- **Location data:** physical location (city, state, country) which you may provide to us or which can be inferred by an IP address.
- **Internet and electronic network activity information we collect automatically:** browsing history, search history, your operating system, date and time information, online identifiers (e.g. IP address or other similar identifiers) and other technical information about your device (e.g. cookie and pixel tag information).
- **Inferences drawn from other personal information:** profile reflecting preferences, predispositions, behavior, attitudes, abilities and aptitudes. Our processing of this personal information always includes manual (human) methods of processing.

This personal information is collected to help you navigate our Sites with greater ease and it allows us to identify which types of content you are most interested in. You can read more about our use of cookies and similar technologies in the [Cookie & pixel tags section](#).

If you would like more information from Vistage or if you register on one of our Sites, Vistage collects the following personal information directly from you on a voluntary basis via forms in order to respond to your request:

- **Contact details:** first and last name, email address, postal address, phone number.
- **Business information:** company name, professional role, number of employees, annual revenue and executive experience.

## Employees, Independent Contractors and Candidates

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

Vistage requests candidates applying for employee and independent contractor roles to provide the following personal information in order to process their application:

- **Additional contact details and other identifiers:** in addition to the information described in the “Site Users” section above, Vistage also requests residency and work permit status, driver’s license number, government identification numbers and/or other similar identifiers.
- **Protected classifications and other demographic data:** age, gender, race, ethnicity and/or similar demographic information. We will use this information to comply with anti-discrimination laws and government reporting obligations, to help ensure equal employment opportunities and/or to conduct internal research on company demographics.

- **Background information:** academic and professional qualifications, education, CV/resume, credit history and/or civil/criminal records data (utilized for background check and vetting purposes where permissible and in accordance with applicable law).
- **Location data:** physical location (e.g. city, state, country).

### Vistage Community Members

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

- **Account credentials:** username, password and similar account authentication information.
- **Financial information:** credit card, billing, bank account details and other payment information.
- **Commercial information:** records of services purchased, obtained or considered, or other purchasing or consuming histories.
- **Inferences drawn from other personal information:** profile reflecting preferences, characteristics, predispositions, behavior, attitudes, abilities and aptitudes. Our processing of this personal information always includes manual (human) methods of processing.

## How we collect personal information

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

### Directly from you

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

### Indirectly from you

When you visit our Sites, Vistage automatically receives certain internet and electronic network activity information. This personal information is automatically recorded on our server logs from your browser, including unique identifiers such as your Internet Protocol (IP) address, Vistage cookie information, and the page you request. Vistage also collects information using analytics tools (directly or through our partners and advertisers) when you visit our Sites. This information

is collected to help us improve our Sites and to provide relevant content. See the [Cookies & pixel tags](#) section below for a more details.

### Our partners and advertisers share information with us

Vistage may receive personal information about you from our affiliates, advertisers, data analytics providers, social networks, data brokers, partners, independent contractors and other authorized service providers who are working on our behalf pursuant to appropriate contractual terms restricting their use of personal information.

## How we use personal information

Vistage uses personal information to operate, manage and improve our Services and Sites. We may rely on various legal means or legal bases for collecting and processing personal information, including:

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

The legal basis Vistage is required to use in order to collect and use your personal information will depend on your interaction with us and applicable law. If you have any questions about the legal basis, you can contact Vistage's Privacy Team at [privacy@vistage.com](mailto:privacy@vistage.com).

Vistage may use the personal information we collect for one or more of the following business purposes:

### Fulfill your requests

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

### Provide Services

If you are a Vistage Community Member, your personal information (e.g. contact details, business information, account credentials and financial information) is used to administer your account. The legal basis for administrating your Vistage account and providing related Services is necessity to perform our contractual obligations.

### International Network – My Vistage

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

We have a legitimate interest in providing Vistage Community Members with an international network.

### Operate, maintain and improve our Sites

When you visit our Sites, Vistage collects the personal information you provide directly as well as indirectly via cookies and similar technologies. The personal information collected indirectly may include location data as well as internet and electronic network activity. Vistage will record your use of our Sites to operate and improve our Sites, thus helping us to better understand your needs and interests. We use certain analytic/tracking cookies service providers to improve and personalize your experience (e.g. BlueConic and Google Analytics).

Vistage has a legitimate interest in attracting new Members and understanding how our Sites are being used. We will seek your advance permission to use cookies or similar technologies, where legally required.

### Communicate with you

Depending on the circumstances, your personal information may also be used to send additional information about Vistage’s Services, updates, promotions and events (“Communications”) unless you opt out from receiving such Communications. We will seek your advance permission to send Communications if legally required.

Vistage sends Communications in accordance with applicable law and in furtherance of our legitimate business interest to maintain relationships, obtain referrals and to promote our range of Services and events.

### Administer the Vistage alumni program

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

### General business and legal obligations

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

Vistage undertakes technical and organization measures to ensure the security of your data. Once we have received your personal data, we will use appropriate procedures to try to prevent unauthorized processing. However, we cannot warrant that the information which you provide to us will not be used by those who access and use your data in violation of this Privacy Policy or our [Terms of Use](#). There is no guarantee that data may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or operational safeguards. Vistage uses data for security, fraud prevention and investigations against any party who violates this Privacy Policy or Terms of Use.

## How we share personal information

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

We may also share your personal information with authorized service providers for Vistage business purposes.

Vistage has disclosed personal information listed in this Privacy Policy to the following categories of recipients for Vistage business purposes:

- Service providers, including customer relation management solutions (e.g. Salesforce), event management platforms (e.g. Cvent) and cloud database management services (e.g. Box.com) to assist in providing Services, organizing events, technical support and account management.
- Independent contractors, including Vistage Chairs, speakers and business partners to assist Vistage with providing Services.
- Analytic/tracking cookies service providers (e.g. BlueConic, Google Analytics) to assist us with technical support, measuring the effectiveness of advertisements and understanding who is visiting our Sites and which parts of our Sites are most visited.

These service providers will be obliged to abide by appropriate contractual terms and are not permitted to use your personal information for any purpose unrelated to providing services to Vistage.

We may also share personal information if required by law; in the exercise of our legal rights; to effect a merger/acquisition; to investigate, prevent, or take action regarding actual or suspected illegal or malicious activities; or to address actual or suspected violations of Vistage's Terms of

Use, and Confidentiality Pledge and Standards. Vistage will not otherwise share your personal information with other individuals or companies, except when you have otherwise authorized this information to be shared.

Vistage does not sell personal information about you.

## How long we keep personal information

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

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

## International transfer of information collected

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

Where necessary to comply with applicable law, Vistage enters into data processing agreements and relies on a relevant adequacy decision or provides for appropriate safeguards by engaging in Standard Contractual Clauses with its global subsidiaries, Licensees and authorized service providers.

## How to access and control your personal information

Your rights to access and control your personal information may vary depending on your location and applicable law. If you are a European, United Kingdom or Swiss resident, see the [Residents of the European Union, United Kingdom and Switzerland](#) section below for specific details.

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

### Access to your personal information

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

### Deletion request rights

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

### No discriminatory treatment

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

### Residents of the European Union, United Kingdom and Switzerland

The European Union's General Data Protection Regulation (EU GDPR), the United Kingdom's Data Protection Act 2018 (UK GDPR), and the Swiss Federal Data Protection Act of June 19, 1992 (FADP), which will be replaced by the Revised Federal Data Protection Act (Revised FADP) when it becomes effective, provide certain rights.

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

If you have any unresolved concerns that we have not addressed satisfactorily related to how we are processing your personal information, you have the right to contact the [European or United Kingdom Data Protection Authorities](#) or the Swiss Federal Data Protection and Information Commissioner (FDPIC).



## How to exercise your rights

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

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

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

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

## **Communication preferences**

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

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

## **Cookies & pixel tags**

We collect visitor information by using cookies and pixel tags.

### Cookies

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

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

Accordingly, if you would prefer, you can set up your browser to refuse cookies or to alert you to their presence and thereby allow you to remove them from your computer. If you reject cookies, you may have difficulty navigating parts of our website and may need to enter identifying information each time you access a password-protected page.

### Pixel tag

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

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

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

We also work with analytic/tracking cookies service providers (e.g. BlueConic, Google Analytics), who use tracking technologies to serve advertisements on our behalf across the Internet. These service providers may collect information about your visits to our websites and your interaction with our advertising and other communications.

## **Links to other web sites**

Our Sites contain links to other third party websites; however, we are not responsible for the privacy practices or the content of such websites and do not make any representation as to the existence, sufficiency, accuracy or completeness of such websites or the privacy policies of such

websites. Please see the website's privacy policy for more information on the website owner's data protection practices.

## Changes to this Privacy Policy

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

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

## How to contact us

If you have any questions or complaints regarding this Privacy Policy, please contact Vistage's Privacy Team by filling out our [web form](#) or by email at: [privacy@vistage.com](mailto:privacy@vistage.com). You can also call us at 1.800.589.0531.

To find the postal address and other contact details of the Vistage Subsidiary or Licensee in your country or region, see [Vistage's worldwide locations](#).