

# Development Dimensions International's Privacy Policy

This Privacy Policy is effective as of June 20, 2017.

Development Dimensions International (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 listed below in Appendix A ("Sites").

If you have questions or complaints regarding our Privacy Policy or practices, please contact us at [DataSecurityOffice@ddiworld.com](mailto:DataSecurityOffice@ddiworld.com). The use of information collected through our Sites shall be limited to the purpose of providing the service for which a Client has engaged DDI, for purposes of providing information to prospective Clients, or for the purpose of gathering information on applicants for career opportunities at DDI.

DDI is responsible for the processing of personal data which includes names, company names, email addresses, job titles, addresses, phone numbers, and IP addresses, it receives, under the Privacy Shield Framework, and subsequently transfers to a third party acting as an agent on DDI's behalf. DDI complies with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States. DDI has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

Notwithstanding the above, with respect to personal data received or transferred pursuant to the EU-U.S. and Swiss-U.S. Privacy Shield Framework, DDI is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, DDI may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. Though we make industry standard and reasonable efforts to preserve user privacy, we may need to disclose personal information when required by law where we have a good-faith belief that such action is necessary to comply with a current judicial proceeding, a court order or legal process served on the Sites, to protect your rights, protect your safety or the safety of others and investigate fraud. We do not share personal information with third parties except as part of the provision of services or as otherwise noted in this Policy.

Under certain conditions, more fully described on the Privacy Shield [website](#), you may be entitled to invoke binding arbitration when other dispute resolution procedures have been exhausted.

This Privacy Policy addresses the following privacy issues:

## For All Sites

- Information Collection
- Information Use
- Service Announcements
- Customer Service
- Third Party Intermediaries and Service Providers
- Business Transitions
- Choice/Opt-out
- Links
- Social Media Features
- Security
- Acceptable Use
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- Data Retention
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## For DDI's Internet Sites

- Discussion Forums
- Email A Colleague
- Submit Your Resume for Careers Opportunities
- Profiles
- Widgets
- Blogs, Chat Rooms, Message Boards, and Public Forums
- Customer Testimonials
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- Online Customer Service Chat Cookies
- Search Engine Cookies
- Tracking Technologies
- Local Storage – HTML 5/Flash Cookies
- Advertising
- Log Files
- Newsletter Subscriptions
- Online Customer Service Chat
- Online Surveys

This Privacy Policy covers only information that is collected through the Sites and does not cover information that may be collected through software downloaded from the Sites or third party sites that may be accessed through links provided on Sites.

# Information Collection

DDI, our clients, prospective clients, or job applicants are the owners of the information collected on the Sites. DDI collects information from our users at several different points on the Sites. Third party providers of aggregate traffic analytic services and marketing automation platforms are also used by DDI for marketing and process improvement purposes including the collection of IP Addresses for analyzing web traffic and debugging user processes.

Clients use the Sites to collect candidate/applicant including 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 and the Sites, although at a client's request client sites may link to content on the Sites.

In order to use full functionality offered by the Sites, a user may be required to provide certain Personal Identifying Information (PII). PII 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.

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

Information collected is never sold to third parties nor shared without prior consent except as otherwise noted in this Policy.

# Information Use

DDI will not use individual records or other data in a manner that identifies individuals or client organizations as the source of the data, except for the purposes for which they are collected.

Summaries of these aggregated analyses may be presented to public audiences (e.g., at scientific conferences). Review of our 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. In these summaries, individual client organizations and participant identities remain completely confidential, and results (due to aggregation) cannot be linked to individuals or client organizations; however, the summaries may be linked to specific industries.

Summaries of aggregated data may also be used to create normative profiles for assessments. Normative profiles will not identify individuals but may identify some or all of the client organizations that are contained within the profile for the purpose of defining

the characteristics of the norm sample. Organization names will not be cited unless 5 or more organizations contribute to the aggregated profile and provide the Organizations' consent to display the name. At no time will normative profiles be used that allow an individual's or contributing organization's data to be identified as such.

## Service Announcements

On rare occasions it is necessary to send out a strictly service related announcement. For instance, if one or more of our Sites is temporarily suspended for maintenance we might send users an email. Generally, users may not opt-out of these communications, though they can deactivate their account. However, these communications are not promotional in nature.

## Customer Service

We communicate with users on a regular basis to provide requested services and in regards to issues relating to their account we reply via email or phone, in accordance with the user's wishes.

## Third Party Intermediaries and Service Providers

In order to provide certain services to you, we may on occasion supplement the personal information you submitted to us with information from third party sources such as for background checks. We also partner with other third parties to provide specific services or functionality to our Sites (ex: live chat). We only share the essential information necessary for the third party to provide these services. These third parties are not allowed to use personally identifiable information except for the purpose of providing these services. We do not share, sell, rent, or trade PII with third parties for their promotional purposes.

## Business Transitions

In the event another company goes through a business transition, such as a merger, acquiring DDI, or selling a portion of its assets, users' personal information will, in most instances, be part of the assets transferred. Data collected via some Sites, however, belong to our client organizations and would not be considered an asset to be transferred without prior consent.

## 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 Services.

## 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 each and every Web Site that collects personally identifiable information.

This Privacy Policy applies solely to information collected by the Sites.

## Social Media Features

Our Web site includes Social Media Features, such as Facebook, Twitter and LinkedIn buttons. These sites collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. Social Media Features are either hosted by a third party or hosted directly on our Site. Your interactions with these Features are governed by the privacy policy of the company providing it.

## Security

The DDI Sites take industry standard and reasonable precaution to protect our users' information both during transmission and once we receive it. When users submit PII 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).

No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

The servers that store personally identifiable information are in a secure environment in a locked facility. 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 our visitor's personal data.

## 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 non-conformance to the published technical specifications necessary for access to the Sites. 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 Software, screens within the Software, nor the hard-copy outputs generated from the Software may be used by or disclosed to third parties except as may be required in connection with inquiries by government or regulatory authorities.

Except as expressly authorized herein, users shall not: (i) copy the Software in whole or in part; (ii) reverse compile, reverse assemble, or access with intent to "hack" all or any portion of the Software; (iii) distribute, market, rent, lease, provide access to, or transfer the Software to third parties; or (iv) modify the Software except as otherwise provided. No license, right, or interest in any DDI trademark, trade name, or service mark is granted hereunder.

## Correcting/Updating/Deleting/Deactivating PII

If a user's personally identifiable information changes, or if a user no longer desires our service, we provide a way to access, correct, update or delete/deactivate users' personally identifiable information as noted below.

Contact the technical support staff via email at [techsupport@ddiworld.com](mailto:techsupport@ddiworld.com). We will respond promptly to your request.

## Data Retention

We will retain your information for as long as your account is active or as needed to provide you services including statistical normalization. If you wish to cancel your account or request that we no longer use your information to provide you services contact us at [DataSecurityOffice@ddiworld.com](mailto:DataSecurityOffice@ddiworld.com). We will retain and use your information, which is anonymized and in aggregate, as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## Changes to the Privacy Policy

We will occasionally update this Privacy Policy. When we do, we will post those changes on the Sites, and other places we deem appropriate so our users are always aware of what information we collect, how we use it, and under what circumstances, if any, we

disclose it.

If, however, we are going to use users' personally identifiable 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 users prior to the change becoming effective.

## Protection of Children's Information

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

## Complaints Resolution

In compliance with the Privacy Shield Principles, DDI commits to resolve complaints about our collection or use of your personal information. EU and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact DDI at: [DataSecurityOffice@ddiworld.com](mailto:DataSecurityOffice@ddiworld.com).

## Contact Information

For questions or concerns regarding this Policy, please contact [DataSecurityOffice@ddiworld.com](mailto:DataSecurityOffice@ddiworld.com).

Webmaster

Development Dimensions International 1225 Washington Pike  
Bridgeville, PA 15017  
(412) 257-0600

**THE REMAINDER OF THIS PRIVACY POLICY APPLIES TO DDI'S CORPORATE INTERNET WEB SITES USING THE TOP-LEVEL DOMAINS OF DDIWORLD.COM AND DDI.COM (HEREINAFTER "INTERNET SITES"). YOU CAN ELECT TO STOP READING AT THIS POINT IF YOU ARE NOT ON ONE OF DDI'S INTERNET SITES.**

## Discussion Forums

This section constitutes a binding legal agreement governing the use of DDI Discussion Forums. By using these message boards, you are consenting to be bound by the terms of this agreement. If you do not agree to any of the terms of this agreement, do not make use of these message boards. This agreement governs use of, and participation in, all of the services incorporated within DDI Discussion Forums. We retain the right to amend this agreement from time to time, and your continued use of DDI Discussion Forums constitutes your acceptance of such amendments. If you find changes in these terms in some way that unacceptable, you should discontinue your use of DDI Discussion Forums.

## Email a Colleague

If you choose to use our referral service to tell a colleague about our Sites, we will ask you for your colleague's name and email address. We will automatically send your colleague a one-time email inviting him or her to visit the site. DDI stores this information for the sole purpose of sending this one- time email and tracking the success of our referral program.

Your colleague can contact us at [webmaster@ddiworld.com](mailto:webmaster@ddiworld.com) to request that we remove this information from our database.

## Submit Your Resume for Careers Opportunities

If you choose to use our online resume submission service to apply for a career opportunity with DDI and in order to be considered for a Career Opportunity with DDI, we require you to supply your cover letter, an attached resume document (including latest address, phone, and email information), and the DDI regional office(s) to which you wish to submit your resume.

We will automatically send you a one-time email confirming that resume submission. DDI stores this information for the sole purpose of sending this one-time email and tracking your resume submission.

You can contact us at [resumes@ddiworld.com](mailto:resumes@ddiworld.com) to request that we remove this information from our database.

## Profiles

Information provided by users of the Sites is stored in a user profile. Subsequently collected information related to that user profile that we collect through cookies, log files, and/or third parties is tied to the profile to improve the content of the site for the user. This profile is used to tailor a user's visit to the Sites and to direct pertinent content to them.

We purchase third party marketing data and add it to our existing user database to better target our advertising and provide pertinent information we think our users would be interested in. We use this information to enhance or overlay the profile of individual users. This aggregate marketing data is therefore tied to the users' personally identifiable information.

## Widgets

Widgets support functions that require that you disclose certain personally identifiable



information given the user's choice of participation. This information is collected in many different ways such as: forms, surveys, contests, forums, subscribing or unsubscribing to mailings and correcting or updating personally identifiable information and are only used for the purpose in which they were collected.

## Blogs, Chat Rooms, Message Boards, and Public Forums

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. In short, by posting personal information online that is publicly accessible, you may receive unsolicited messages from other parties in return.

We are not responsible for the personally identifiable information you choose to submit in these forums. To request removal of your personal information from our blog or community forum, contact us at [DataSecurityOffice@ddiworld.com](mailto:DataSecurityOffice@ddiworld.com). In some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why.

## Customer Testimonials

We post customer testimonials on our web site, which may contain personal information. We do obtain the customer'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 [DataSecurityOffice@ddiworld.com](mailto:DataSecurityOffice@ddiworld.com).

## Information Use

Site visitors provide all personal information on a voluntary basis through visible means of data entry or collection. Any personal information becomes available to DDI only when voluntarily submitted by you. Once DDI receives such information, it is sent to the particular office at DDI that is equipped to respond to your request or comment. We do not rent, sell, or exchange information about you to third parties, except as otherwise noted in this Privacy Policy.

DDI may also use such information to provide advance notice of events and new products and services. DDI does not share any personally identifiable information, except as otherwise noted in this Privacy Policy. DDI uses the collected information to improve the content of our Web Site, to enhance existing products and services, and to communicate with you more effectively. However, despite all best efforts, Internet and email communications are never 100% confidential, and it is possible that information transmitted to us may be read or obtained by other parties. We do not release any of your information for any purpose other than its intended use.

## Online Customer Service Chat Cookies

Our third party online customer service chat service provider uses cookies to link profile information (submitted by individuals wishing to contact DDI) with the ongoing chat sessions managed by DDI's client representatives (operators). 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 Web sites are used is collected to assist the user with their customer service experience.

## Search Engine Cookies

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.

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.

This Privacy Policy covers the use of cookies by the Sites and does not cover the use of cookies by any third parties.

## Tracking Technologies

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 user name 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 to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

## Local Storage – HTML 5/Flash 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 LSOs such as HTML 5 to collect and store information. Various browsers may offer their own management tools for removing HTML 5 LSOs.

## Advertising

We partner with a third-party ad network to either display advertising on our Web site 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 in order to provide you advertising based upon your browsing activities and interests. If you wish to not have this information used for the purpose of serving you interest-based ads, you may opt-out by clicking [here](#) (or if located in the European Union click [here](#)). Please note this does not opt you out of being served ads. You will continue to receive generic ads.

## Log Files

Like most standard Web Site servers we use log files to collect statistical information about how our Sites are used. This information includes Internet Protocol (IP) addresses, browser type, Internet Service Provider (ISP), referring / exit pages, platform type, date/time stamp, and number of clicks.

The information we collect is used to analyze trends, administer the Sites, track user's movement in the aggregate, and gather broad demographic information for aggregate use. We may choose to track the above log file information against individual user profiles only when the user has voluntarily set a uniquely identifiable cookie by logging on with a user name and password to the Sites.

## Newsletter Subscriptions

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.

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 opt-out instructions which are included in each communication.

## Online Customer Service Chat

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.

If using this function, users will be asked to enter their names in whatever format or detail they prefer. During the chat, users enter into a live question and answer session

with a DDI operator. Our third party online customer service chat asp service provider maintains dialogue transcripts of these chats. After the chat, users may be asked to fill out an exit survey in order to obtain valuable feedback about DDI service. Filling out the exit survey is completely voluntary. The surveys may ask 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.

## Online Surveys

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.

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.

## APPENDIX A

List of web sites covered by this Privacy Policy

1. <https://ddiworld.com>
2. <https://ddi.com>
3. <https://lm.ddiworld.com> - LEADERSHIP MIRROR®
4. <https://identifyingpotential.ddiworld.com> - IDENTIFYING POTENTIAL
5. <https://lps.ddiworld.com> – LEARNER PORTAL SYSTEM
6. <https://talentportal.ddiworld.com> - DDI TALENT PORTAL
7. <https://tsaccess.ddiworld.com> - TS: ACCESS®
8. <https://www.ddiworld.com/myddi> – MYDDI
9. <https://assessingtalent.ddi.com> – ASSESSING TALENT