

**CMA**  
**PRIVACY POLICY**

Last updated: June 1, 2018

This is the privacy policy (“**Privacy Policy**”) that governs how Colarelli, Meyer, and Associates, Inc. (“**CMA**”, “**we**”, “**our**” or “**us**”), uses Personal Data (defined below) that we collect, receive and store about you in connection with your use of (i) our website: <http://www.cmaconsult.com/>, and any other website that links to this Privacy Policy (each, together with its sub-domains, content, and services, a “**Site**”); and (ii) our personal assessment services that we provide (our “**Service**” or “**Services**”).

You may choose whether or not to provide or disclose Personal Data in connection with your use of our Service. If you choose not to provide the Personal Data we request, you may still visit and use parts of our Service, but may be unable to access or use certain features, options, programs, and services. Our Service may contain links to third-party websites and services that are not owned or controlled by CMA. We are not responsible for the privacy practices or the content of third party websites, services and advertisements, and you visit them at your own risk.

**1. Introduction.**

We are committed to respecting privacy and recognize the need for appropriate protection and management of any Personal Data that is shared with us as part of using our Service. As used in this Privacy Policy, “**Personal Data**” means any information that may be used, either alone or in combination with other information, to personally identify an individual.

**2. Changes to this Privacy Policy.**

We reserve the right, at our discretion, to change the terms of this Privacy Policy at any time. You can see when this Privacy Policy was last updated by reviewing the “Last Updated” legend on the top of this page. We may provide you with notice of material changes to the Privacy Policy as appropriate under the circumstances. UNLESS OTHERWISE INDICATED, ANY CHANGES TO THIS PRIVACY POLICY WILL APPLY IMMEDIATELY UPON POSTING TO Our Service.

**3. Personal Data Collected.**

**3.1. Personal Data You Provide To Us On Our Service.**

a) Types of Personal Data. We and our service providers collect the Personal Data set forth below in order to provide our Service to you, or because we are legally required to do so. If you do not provide the Personal Data we request, we may not be able to provide you with our Service. The Personal Data we and our service providers collect includes but is not limited to:

- Your name;
- User name;
- Password;
- Email address;
- Company name;
- Assessment information (scales and data);
- Phone;
- Communications you send to us.

b) When Personal Data is Collected. You may be required to provide us with certain information that may constitute Personal Data in the following ways:

- **Contact Information.**

In various areas of our Service and in printed materials, we provide you the opportunity to submit a form with basic contact information, such as your name, email, or mailing address. With your permission, CMA uses such information to inform you of new products, technical information and services, and upcoming events that may be of interest. If you no longer wish to receive these emails, the opt-out process is described in Section 7.2 of this Privacy Policy. This does not apply to a candidate completing an assessment.

In addition, if you choose, you may participate in a CMA e-mail list server by subscribing within our Service or by contacting CMA staff directly. You may unsubscribe from these e-mail list servers by following the unsubscribe instructions found within the list email.

- **Member Login Information.**

We process your user name and password to enable you to securely log into our Service, and we process information regarding your role with CMA to appropriately control access to restricted content. We process this Personal Data only as necessary to provide you services on our Service under our Terms of Use and to further our legitimate interests in protecting our Service and content.

- **Payment Information.**

When you purchase services or products from us, third-party service providers acting on our behalf process payment information, including payment card details and billing addresses, to help us fulfill your orders. Any Personal Data collected by such third party will be subject to the third party's privacy policy, rather than this Privacy Policy.

- **Information Collected through Various Forms.**

We and our service providers may collect Personal Data in a variety of ways, including: (i) through our Tools which allow for online access and download of CMA assessment content (ii) through use of our Site, e.g., when you sign up for a newsletter or marketing communication; (iii) offline, such as when you attend one of our seminars or contact customer service; or (iv) from other sources, such as public databases, joint marketing partners, and from other third parties.

- **Personal Data You Disclose Relating to Others.**

If you disclose any Personal Data relating to other people to us or to our service providers in connection with our Service, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

3.2. Personal Data You Provide To Third Parties On Our Service. Please note that we use certain third party service providers on our Service to enhance your experience or deliver certain services. These providers may collect Personal Data about you in performing their services and/or functions on our Service. For example, we use the following third party service providers for our Services identified:

- Quintela Group for talent assessment features. For more information about the privacy practices of this service provider, please review: <https://cma.quintelagroup.com/privacy>
- Google Maps to provide mapping features on our Service. For more information about the privacy practices of this service provider, please review: <https://policies.google.com/privacy>
- ShareThis for user sharing tools on our Service. For more information about the privacy practices of this service provider, please review: <https://www.sharethis.com/privacy/>

- Microsoft Azure, for hosting solutions. For more information about the privacy practices of this service provider, please review: <https://www.microsoft.com/en-us/trustcenter/privacy/default.aspx>
- MRG for talent assessment features. For more information about the privacy practices of this service provider, please review: <https://questv2.mrg.com/Pages/Privacy.aspx>
- CEB for talent assessment features. For more information about the privacy practices of this service provider, please review: <https://www.cebglobal.com/privacy.html>
- CPP for talent assessment features. For more information about the privacy practices of this service provider, please review: <https://www.cpp.com/en-US/Support/Privacy-Policy>
- Pearson for talent assessment features. For more information about the privacy practices of this service provider, please review: <https://tara.vitapowered.com/PrivacyPolicy.aspx>
- General Dynamics Information Technology for talent assessment features. For more information about the privacy practices of this service provider, please review: <https://gdit.com/about/privacy-policy/>
- Personality Profile Solutions for talent assessment features. For more information about the privacy practices of this service provider, please review: <https://www.discprofile.com/privacy/>
- PSI for talent assessment features. For more information about the privacy practices of this service provider, please review: <https://apolloadministration.adc.uk.com/LegalNotices.aspx>
- Qualtrics for talent assessment features. For more information about the privacy practices of this service provider, please review: <https://www.qualtrics.com/privacy-statement/>
- Hogan Assessment Systems, Inc. for talent assessment features. For more information about the privacy practices of this service provider, please review: <https://www.hoganassessments.com/privacy-policy/>
- Survey Monkey for survey features. For more information about the privacy practices of this service provider, please review: [https://www.surveymonkey.com/mp/legal/privacy-policy/?ut\\_source=footer](https://www.surveymonkey.com/mp/legal/privacy-policy/?ut_source=footer)
- The Highlands Company for talent assessment features. For more information about the privacy practices of this service provider, please review: <https://www.highlandsco.com/privacy-policy/>

3.3. Information Collected Automatically. Certain information on our Service is collected automatically by means of various software tools. We have a legitimate interest in using such information to assist in log-in, systems administration purposes, information security and abuse prevention, to track user trends, and to analyze the effectiveness of our Service. Alone or in combination with other information, such automatically collected information may constitute Personal Data. Some of our service providers (described in Section 5, below) may use cookies or other methods to gather information regarding your use of our Service. Such third parties may use these cookies or other tracking methods for their own purposes by relating information about your use of our Service with any Personal Data about you that they may have. The use of such information by a third party depends on the privacy policy of that third party.

a) Log Files On Our Service. The information inside the log files includes internet protocol (“IP”) addresses, type of browser, Internet Service Provider (ISP), date/time stamp, referring/exit pages, clicked pages and any other information your browser may send to us.

b) Cookies. We use cookies to make interactions with our Service easy and meaningful. When you visit our Service, our servers may send a cookie to your computer. Standing alone, cookies do not personally identify you; they merely recognize your web browser. Unless you choose to identify yourself to us, either by responding to a promotional offer, opening an account, or filling out a web form, you remain anonymous to us.

We may use cookies that are session-based and persistent-based. Session cookies exist only during one session. They disappear from your computer when you close your browser software or turn off your computer. Persistent cookies remain on your computer after you close your browser or turn off your computer. Please note that if you disable your web browser's ability to accept cookies, you will be able to navigate our Service, but you may not be able to successfully use all of the features of our Site

c) Other Tracking Technologies. When you visit our Service, we may collect your IP address for certain purposes such as to monitor the regions from which you navigate our Service. We may also use web beacons alone or in conjunction with cookies to compile information about your usage of our Service and interaction with emails from us. Web beacons are clear electronic images that can recognize certain types of information on your computer, such as cookies, when you viewed a particular Service tied to the web beacon. For example, we may place web beacons in marketing emails that notify us when you click on a link in the email that directs you to our Service. We may use web beacons to operate and improve our Service and email communications.

d) Analytics Software Tools. We use Google Analytics on our Service to help us analyze the traffic on our Service. For more information on Google Analytics' processing of Personal Data, please see <http://www.google.com/policies/privacy/partners/>. By using a browser plugin <http://www.google.com/ads/preferences/plugin/> provided by Google, you can opt out of Google Analytics.

#### **4. The Purposes For Which We Use Personal Data.**

If you submit or we collect Personal Data through our Service, then such Personal Data may be used in the following ways: (i) to provide, analyze, administer, and improve our Service and services, (ii) to contact you in connection with our Service and certain services, notifications, events, programs or offerings that you may have registered for, (iii) to send you updates and promotional materials that you have registered for, (iv) to identify and authenticate your access to the parts of our Service and services that you are authorized to access; (v) for recruiting and human resources administration purposes, and (vi) to protect our rights and/or our property and to ensure the technical functionality and security of our Service.

#### **5. How We Disclose Personal Data.**

We do not sell, lease, rent or otherwise disclose the Personal Data collected from our Service to third parties unless otherwise stated below or with your consent.

5.1. Our Third Party Providers. We transfer Personal Data to our third party service providers to perform tasks on our behalf and to assist us in providing our Service, as more fully described in Section 3.2. We use commercially reasonable efforts to only engage or interact with third party service providers and partners that post a privacy policy governing their processing of Personal Data. Notwithstanding the foregoing, we will comply with applicable laws regarding Personal Data transfers as well as any transfer restriction that is specified in an agreement between CMA and a customer.

5.2. Business Partners. From time to time, we may partner with other companies to jointly offer products or services. If you purchase or specifically express interest in a jointly-offered product or service from us, we may share Personal Data collected in connection with your purchase or expression of interest with our

joint promotion partner(s). We do not control our business partners' use of Personal Data we collect, and their use of the information will be in accordance with their own privacy policies.

5.3. In the Event of Merger, Sale, or Change of Control. We may transfer or assign this Privacy Policy and any Personal Data to a third party entity that acquires or is merged with us as part of a merger, acquisition, sale, or other change of control.

5.4. Other Disclosures. We may disclose Personal Data about you if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to: (i) comply with any applicable law, regulation, legal process or governmental request; (ii) enforce our terms of use, including investigations of potential violations thereof; (iii) detect, prevent, or otherwise address fraud or security issues; or (iv) protect against harm to the rights, property or safety of CMA, our users, or the public.

## 6. Retention of Personal Data.

We reserve the right to retain any Personal Data as long as the Personal Data are needed to: (i) fulfill the purposes that are described in Section 4 (The Purposes For Which We Use Personal Data), and (ii) comply with applicable law.

## 7. Your Rights.

7.1 Personal Data. If you have an account on our Service, we provide access to—and the ability to edit or delete—certain categories of Personal Data through the account.

If you would like to access, amend, erase, export (i.e., data portability), or object to or restrict the processing of Personal Data collected via our Service, you may submit a request to [info@cmaconsult.com](mailto:info@cmaconsult.com) or write to us at:

CMA  
7751 Carondelet Avenue, Suite #200  
Saint Louis, MO 63105

We will promptly review all such requests in accordance with applicable laws.

Depending on where you live, you may have a right to lodge a complaint with a supervisory authority or other regulatory agency if you believe that we have violated any of the rights concerning Personal Data about you. We encourage you to first reach out to us at [info@cmaconsult.com](mailto:info@cmaconsult.com) so we have an opportunity to address your concerns directly before you do so.

7.2. Opting-Out of Promotional Emails. You may choose not to receive future promotional or advertising emails from us by selecting an unsubscribe link at the bottom of each email that you receive from us, or by responding to the emails directly and requesting removal if such a link is not available. Additionally, you may send a request specifying your communications preferences to [info@cmaconsult.com](mailto:info@cmaconsult.com). Customers cannot opt out of receiving transactional emails related to their account with us or our services. Please note that even if you opt out of receiving the foregoing emails, we may still send you a response to any "Contact Us" request as well as administrative, maintenance and operational emails (for example, in connection with a password reset request).

## 8. International Visitors

Our Service is operated and managed on servers located within the United States. If you choose to use our Service from regions of the world with laws governing data collection and use that differ from U.S. law, then you acknowledge and agree that you are transferring information, including your Personal Data, outside of those regions to the United States and that, by providing your Personal Data on our Service, you consent to that transfer. We will take all steps reasonably necessary to ensure that your Personal

Data is treated securely and in accordance with this policy. Each affiliate or supplier receiving your Personal Data is bound by Standard Contractual Clauses that comply with the standard contractual clauses for the transfer of Personal Data to controllers established in third countries set out in the European Commission Decision 2010/87/EU.

#### **9. Data Security.**

The security of Personal Data is important to us. We follow generally accepted industry standards to protect the Personal Data submitted to us, both during transmission and once we receive it. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect Personal Data, we cannot guarantee its absolute security.

#### **10. Children's Privacy.**

Our Service is not intended for children under the age of 18. Accordingly, we do not intend to collect Personal Data from anyone we know to be under 18 years of age.

#### **11. How We Respond to Do Not Track Signals.**

CMA does not track Service users over time and across third party websites to provide targeted advertising. Accordingly, we do not currently respond or take any action with respect to web browser "do not track" signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of Personal Data about an individual consumer's online activities over time and across third-party websites or online services.

#### **12. Your California Privacy Rights.**

If you are a California resident, California Civil Code Section 1798.83 permits you to request information regarding the disclosure of Personal Data about you by CMA to third parties for the third parties' direct marketing purposes. To make such a request, please send an email to [info@cmaconsult.com](mailto:info@cmaconsult.com) or write to us:

CMA  
7751 Carondelet Avenue, Suite #200  
Saint Louis, MO 63105

#### **13. Contacting Us.**

Any comments, concerns, complaints, or questions regarding our Privacy Policy may be addressed to the CMA at [info@cmaconsult.com](mailto:info@cmaconsult.com).