

Jochen Werner Consulting

SECURITY AND PRIVACY POLICY

October 2018

1. Privacy Statement, effective as of October 1, 2018

JW Consulting, (“JW Consulting,” “we,” “us,” “our,” or the “Company”) is committed to protecting the privacy of individuals who visit the Company’s Websites (“Visitors”), individuals who register to use the Services as defined below (“Customers”), and individuals who register to attend the Company’s corporate events (“Attendees”). This Privacy Statement describes JW Consulting’s privacy practices in relation to the use of the Company’s Websites and the related applications, services, and programs offered by JW Consulting (collectively, the “Services”), as well as individuals’ choices regarding use, access and correction of personal information.

If you have questions or complaints regarding JW Consulting’s Privacy Statement or associated practices, please contact us here: info@jochen-werner-consulting.com. This Privacy Statement covers the information practices, including how the Company collects, uses, shares and secures the personal information you provide, of Websites that link to this Privacy Statement (collectively referred to as “JW Consulting’s Websites” or “the Company’s Websites”).

JW Consulting’s Websites may contain links to other Websites. The information practices or the content of such other Websites is governed by the privacy statements of such other Websites. The Company encourages you to review the privacy statements of other Websites to understand their information practices

2. Information collected

When expressing an interest in obtaining additional information about the Services, or registering to use the Websites or other Services, or registering for an event, JW Consulting requires you to provide the Company with personal contact information, such as name, company name, address, phone number, and email address (“Required Contact Information”).

When purchasing the Services or registering for an event, JW Consulting may also require you to provide the Company with financial qualification and billing information, such as billing name and address, credit card number, and the number of employees within the organization that will be using the Services (“Billing Information”). JW Consulting may also ask you to provide additional information, such as company annual revenues, number of employees, or industry (“Optional Information”).

When Visitors apply for a job with the Company, JW Consulting may also require you to submit additional personal information as well as a resume or curriculum vitae (“Applicant Information”). Required Contact Information, Billing Information, Applicant Information, Optional Information and any other information you submit to JW Consulting to or through the Services are referred to collectively as “Data.”

As you navigate the Company's Websites, JW Consulting may also collect information through the use of commonly used information-gathering tools, such as cookies and Web beacons ("Website Navigational Information"). Website Navigational Information includes standard information from your Web browser (such as browser type and browser language), your Internet Protocol ("IP") address, and the actions you take on the Company's Websites (such as the Web pages viewed and the links clicked).

Through our "import contacts" feature option, we may also collect information such as the name, company name, address, phone number or email address of contacts that you choose to share with us. When you provide us with personal information about your contacts, we will only use this information for the specific reason for which it is provided, such as to add new records to your account.

3. Use of information collected

The Company uses Data about JW Consulting Customers to perform the services requested. For example, if you fill out a "Contact Me" Web form, the Company will use the information provided to contact you about your interest in the Services.

The Company also uses Data about JW Consulting Attendees to plan and host corporate events, host online forums and social networks in which event Attendees may participate, and to populate online profiles for Attendees on the Company's Websites. Additional information on the Company's privacy practices with respect to Data about JW Consulting Attendees may be found in additional privacy statements on the event Websites, as the case may be.

The Company may also use Data about JW Consulting Customers and Attendees for marketing purposes. For example, the Company may use information you provide to contact you to further discuss your interest in the Services and to send you information regarding the Company, its affiliates, and its partners, such as information about promotions or events.

JW Consulting may also receive information about Customers and Attendees from other sources, including third parties from whom we have purchased data, and combine this information with Data we already have about you. This helps us to update, expand and analyze our records, identify new customers, and create more tailored advertising to provide products and services that may be of interest to you.

JW Consulting uses credit card information solely to check the financial qualifications and collect payment from prospective Customers and Attendees.

JW Consulting uses Website Navigational Information to operate and improve the Company's Websites. The Company may also use Website Navigational Information alone or in combination with Data about JW Consulting Customers and Data about JW Consulting Attendees to provide personalized information about the Company.

JW Consulting partners with third parties to display advertising on our Websites and Services or to manage our advertising on other sites. Our third-party partners may use cookies or similar technologies provide you advertising based upon your browsing activities and interests. If you wish to opt out of interest-based advertising, please contact us. Please note you will continue to receive generic ads.

4. Website Navigational

Information Cookies, Web Beacons and IP Addresses

JW Consulting uses commonly-used information-gathering tools, such as cookies and Web beacons, to collect information as you navigate the Company's Websites ("Website Navigational Information"). As described more fully below, we and our partners use these cookies or similar technologies to analyze trends, administer Websites and Services, track users' movements around our Websites and Services, serve targeted advertisements and gather demographic information about our user base as a whole. This section describes the types of Website Navigational Information used on the Company's Websites and Services, and how this information may be used.

Cookies

JW Consulting uses cookies to make interactions with the Company's Websites easy and meaningful. When you visit one of the Company's Websites, JW Consulting's servers send a cookie to your computer or device. Standing alone, cookies do not personally identify you; they merely recognize your Web browser. Unless you choose to identify yourself to JW Consulting, either by responding to a promotional offer, opening an account, or filling out a Web form (such as a "Contact Me" Web form) or have previously identified yourself to JW Consulting, you remain anonymous to the Company.

JW Consulting uses cookies that are session-based and persistent-based. Session cookies exist only during one session. They disappear from your computer or device when you close your browser software or turn off your computer. Persistent cookies remain on your computer or device after you close your browser or turn off your computer. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our Websites or Services.

Web Beacons

JW Consulting uses Web beacons alone or in conjunction with cookies to compile information about Customers and Visitors' usage of the Company's Websites and interaction with emails from the Company. Web beacons are clear electronic images that can recognize certain types of information on your computer, such as cookies, when you viewed a particular Website or Service tied to the Web beacon, and a description of a Website or Service tied to the Web beacon. For example, JW Consulting may place Web beacons in marketing emails that notify the Company when you click on a link in the email that directs you to one of the Company's Websites. JW Consulting uses Web beacons to operate and improve the Company's Websites, Services and email communications

Log Files, IP Addresses, URLs and Other Data

As is true of most Websites, we gather certain information automatically to analyze trends in the aggregate and administer our Websites and Services. This information may include your Internet Protocol (IP) address (or the proxy server you use to access the World Wide Web), device and application identification numbers, your location, your browser type, your Internet service provider and/or mobile carrier, the pages and files you viewed, your searches, your operating system and system configuration information, and date/time stamps associated with your usage. Due to Internet communications standards, when you visit or use the Company's Websites and Services, we automatically receive the URL of the website from which you came and the website to which you go when you leave our Website. This information is used to analyze overall trends, to help us improve our Websites and Services, to track and aggregate non-personal information, and to provide the Websites and Services. For example, JW Consulting uses IP addresses to monitor the regions from which Customers and Visitors navigate the Company's Websites.

Social Media Features and Single Sign-on

The Company's Websites may use social media features, such as the Facebook "like" button ("Social Media Features"). These features may collect your IP address and which page you are visiting on the Company's Website, and may set a cookie to enable the feature to function properly. You may be given the option by such Social Media Features to post information about your activities on the Company's Website to a profile page of yours that is provided by a third party social media network in order to share with others within your network. Social Media Features are either hosted by a third party or hosted directly on the Company's Website. Your interactions with these features are governed by the privacy policy of the company providing the relevant Social Media Features. JW Consulting also allows you to log in to certain of our Websites and Services using sign-in services such as Facebook Connect. These services will authenticate your identity and provide you the option to share certain personal information with us such as your name and email address to pre-populate our signup form.

Do Not Track

Currently, various browsers — including Internet Explorer, Firefox, and Safari — offer a "do not track" or "DNT" option that relies on a technology known as a DNT header, which sends a signal to Websites' visited by the user about the user's browser DNT preference setting. JW Consulting does not currently commit to responding to browsers' DNT signals with respect to the Company's Websites, in part, because no common industry standard for DNT has been adopted by industry groups, technology companies or regulators, including no consistent standard of interpreting user intent. JW Consulting takes privacy and meaningful choice seriously and will make efforts to continue to monitor developments around DNT browser technology and the implementation of a standard.

5. Public forums, refer a contact, and customer testimonials

JW Consulting may provide bulletin boards, blogs, or chat rooms on the Company's Websites. Any personal information you choose to submit in such a forum may be read, collected, or used by others who visit these forums, and may be used to send you unsolicited messages. JW Consulting is not responsible for the personal information you choose to submit in these forums. JW Consulting posts a list of Customers and testimonials on the Company's Websites that contain information such as Customer names and titles. JW Consulting obtains the consent of each Customer prior to posting any information on such a list or posting testimonials

6. Sharing of information collected

Service Providers

JW Consulting may share Data about JW Consulting Visitors, Customers and Attendees with the Company's contracted service providers so that these service providers can provide services on our behalf. These service providers are authorized to use your personal information only as necessary to provide the requested services to us. Without limiting the foregoing, JW Consulting may also share Data about JW Consulting Visitors, Customers and Attendees with the Company's service providers to ensure the quality of information provided, and with third-party social networking and media Websites, such as Facebook, for marketing and advertising on those Websites. Unless described in this Privacy Statement, JW Consulting does not share, sell, rent, or trade any information with third parties for their promotional purposes.

JW Consulting Affiliates

The Company may share Data about JW Consulting Customers with other companies in order to work with them, including affiliates of the JW Consulting corporate group. For example, the Company may need to share Data about JW Consulting Customers with other companies within the JW Consulting corporate family for customer support, marketing, technical operations and account management purposes.

Business Partners

From time to time, JW Consulting may partner with other companies to jointly offer products, services, or programs (such as webinars or downloadable content). If you purchase, specifically express interest in, or register for a jointly-offered product, service, or program from or through JW Consulting, the Company may share Data about JW Consulting Customers collected in connection with your purchase or expression of interest with our partner(s). JW Consulting does not control our business partners' use of the Data about JW Consulting Customers that we collect, and their use of the information will be in accordance with their own privacy policies. If you do not wish for your information to be shared in this manner, you may opt not to purchase or specifically express interest in a jointly offered product or service. JW Consulting does not share Data about JW Consulting Attendees with business partners unless: (1) you specifically opt in to such sharing via an event registration form; or (2) you attend a Company event and allow JW Consulting or any of its business partners to scan your attendee badge. If you do not wish for your information to be shared in this manner, you may choose not to opt in via event registration forms and elect not to have your badge scanned at Company events. If you choose to share your information with business partners in the manners described above, your information will be subject to the business partners' respective privacy statements.

Third Parties

Section 4 of this Privacy Statement, Website Navigational Information, specifically addresses the information we or third parties collect through cookies and web beacons, and how you can control cookies through your Web browsers. We may also disclose your personal information to any third party with your prior consent.

Billing

JW Consulting uses a third-party service provider to manage credit card processing. This service provider is not permitted to store, retain, or use Billing Information except for the sole purpose of credit card processing on the Company's behalf.

Compelled Disclosure

JW Consulting reserves the right to use or disclose information provided if required by law or if the Company reasonably believes that use or disclosure is necessary to protect the Company's rights and/or to comply with a judicial proceeding, court order, or legal process.

7. International transfer of information collected

The Company primarily stores Data about JW Consulting Customers and Data about JW Consulting Attendees in Switzerland and/or within the EU. To facilitate JW Consulting's global operations, the Company may transfer and access such information from around the world, including from other countries in which the Company has operations. This Privacy Statement shall apply even if JW Consulting transfers Data about JW Consulting Customers or Data about JW Consulting Attendees to other countries.

8. Communications preferences

JW Consulting offers Visitors, Customers, and Attendees who provide contact information a means to choose how the Company uses the information provided. You may manage your receipt of marketing and non-transactional communications by clicking on the “unsubscribe” link located on the bottom of the Company’s marketing emails. Additionally, you may unsubscribe here or by contacting us using the information in the “Contacting Us” section below.

9. Correcting and updating your information

JW Consulting may retain your information for a period of time consistent with the original purpose of collection. For instance, we may retain your information during the time in which you have an account to use our Websites or Services and for a reasonable period of time afterward. We also may retain your information during the period of time needed for JW Consulting to pursue our legitimate business interests, conduct audits, comply with our legal obligations, resolve disputes and enforce our agreements. You may request to review, correct, delete or otherwise modify any of the personal information that you have previously provided to us through the Company’s Websites and Services. If you have registered for an account with JW Consulting, you may generally update your user settings, profile, organization’s settings or event registration by logging into the applicable Website or Service with your username and password and editing your settings or profile. To update your billing information, discontinue your account, and/or request return or deletion of Your Data associated with your account, please contact your account representative or the customer service team for the applicable Service. For other requests to access, correct, modify or delete Your Data, please review the “Contacting Us” section below. Requests to access, change, or delete your information will be addressed within a reasonable timeframe. If you are an employee of a JW Consulting customer, you may also wish to contact your company’s system administrator for assistance in correcting or updating your information.

10. Customer Data

JW Consulting’s Customers may electronically submit data or information to the Services for hosting and processing purposes (“Customer Data”). JW Consulting will not review, share, distribute, or reference any such Customer Data except as provided in JW Consulting’s Terms and Conditions, or as may be required by law. Customers may provide their customer’s data (“End Customer data”) to JW Consulting, for hosting and processing purposes, within the scope of JW Consulting’s provided services (cleansing, imports etc). The customer is responsible to ensure the proper handling of their own data, and for complying with all laws and regulations applicable to him, to safeguard and ensure their End Customer’s data privacy. JW Consulting will not verify their End Customer’s data provenance, nor if proper measures were used to obtain their End Customer’s data or if data privacy regulations were respected. The Customer expressly confirms their data’s provenance, as compliant to regulations and authorizes JW Consulting to process said data, within the scope of JW Consulting services to be provided. In accordance with JW Consulting’s Terms and Conditions, JW Consulting may access Customer Data only for the purpose of providing the Services or preventing or addressing service or technical problems or as may be required by law. JW Consulting acknowledges that you have the right to access your personal information. If personal information pertaining to you as an individual has been submitted to us by a JW Consulting customer and you wish to exercise any rights you may have to access, correct, amend, or delete such data, please inquire with our customer directly. Because JW Consulting personnel have limited ability to access data our customers submit to our Services, if you wish to make your request directly to JW Consulting, please provide the name of the JW Consulting customer who

submitted your data to our Services. We will refer your request to that customer, and will support them as needed in responding to your request within a reasonable timeframe.

11. Security

JW Consulting uses robust security measures to protect Data about JW Consulting Customers and Data about JW Consulting Attendees. Because the Company uses the Services to maintain Data about JW Consulting Customers and Data about JW Consulting Attendees, this information, which is stored in the Services, is secured in the same manner as described here .

12. Mobile applications

Without limiting the generality of this Privacy Statement, in addition to information gathered through its Websites or submitted to its Services, JW Consulting may obtain information through applications (“Mobile Applications”) that Customers or their authorized individuals (“Users”) download to, and run on, their mobile devices (“Devices”). Mobile Applications provided by JW Consulting may obtain information from, or access data stored on, Users’ Devices to provide services related to the relevant Mobile Application. For example, a Mobile Application may: access a camera on a User’s Device to enable the User to upload photographs to the Services; access the call history on a User’s Device to enable the User to upload that information to the Services; access calendar information on a User’s Device to enable the User to match meeting attendees with contacts submitted by the User to the Services; access the geographic location of a User’s Device to enable the User to identify contacts submitted by the User the Services who are nearby; or access contact information on a User’s Device to enable the User to sync contact information between the information that is stored on the User’s Device and the information that is submitted to the Services. Information obtained to provide Mobile Application services may include information obtained in preparation for anticipated updates to those services. Mobile Applications may transmit information to and from Devices to provide the Mobile Application services. Mobile Applications may provide JW Consulting with information related to Users’ use of the Mobile Application services, information regarding Users’ computer systems, and information regarding Users’ interaction with Mobile Applications, which JW Consulting may use to provide and improve the Mobile Application services. For example, all actions taken in a Mobile Application may be logged, along with associated information (such as the time of day when each action was taken). JW Consulting may also share anonymous data about these actions with third party providers of analytics services. In addition, if a User downloads a JW Consulting Mobile Application after clicking on a third-party mobile advertisement for the Mobile Application or for JW Consulting, the third-party advertiser may provide JW Consulting with certain information, such as the User’s Device identification information, which JW Consulting may use to track the performance of its advertising campaigns. Customers may configure JW Consulting Mobile Application services, and the information accessed or obtained by the Mobile Application on a User’s Device may be affected by the Customer’s configuration. In addition, if a Customer purchases more than one Service from JW Consulting and its affiliates, a Mobile Application may be designed to interoperate with those Services; for instance, to provide a User with access to information from any or all of those Services or to provide information from a User’s Device to any or all of those Services. Information accessed or obtained by the Mobile Application on a User’s Device may be accessible to the Customer and its organization, depending on the intended functionality of the Mobile Application. JW Consulting may provide updated versions of its Mobile Applications. If your mobile device’s settings permit, those updates will be downloaded and installed automatically on your mobile device. By installing a JW Consulting Mobile Application on your mobile device, you consent to the downloading and updating of that Mobile Application. Notices and contractual terms related to a particular Mobile

Application may be found in the End User License Agreement or relevant terms of service for that application. The Company encourages you to review the End User License Agreement or relevant terms of service related to any Mobile Applications you download, install, use, or otherwise interact with to understand that Mobile Application's information practices. The Mobile Application's access to information through a User's Device does not cause that information to be "Customer Data" under JW Consulting's Terms and Conditions with the Customer or under this Privacy Statement, except as follows: To the extent that a User uses a Mobile Application to submit electronic data and information to a Customer account on our Services pursuant to the Customer's Master Subscription Agreement with JW Consulting (or a similar agreement that governs the Customer's subscription(s) to JW Consulting's Services), that information constitutes "Customer Data" as defined in such agreement, and the provisions of that agreement with respect to privacy and security of such data will apply. Additional information about the Company's privacy and security practices with respect to Customer Data is available here.

13. Changes to this Security and Privacy Policy

JW Consulting reserves the right to change this Policy at any time. JW Consulting will provide notification of the material changes to this Privacy Statement through the Company's Websites at least thirty (30) business days prior to the change taking effect.

14. Contacting us

Questions regarding this Security and Privacy Statement or the information practices of the Company's Websites and Services should be directed to JW Consulting Privacy by mailing us at: info@jochen-werner-consulting.com