

# **PRIVACY POLICY**

Heruka Lifescience & Health Innovations takes the privacy and security of your information seriously. This Policy describes how Heruka Lifescience & Health Innovations collect, use, transfer, and disclose your information. This Policy covers information Heruka Lifescience & Health Innovations collects in connection with our Consulting Services, and Products (collectively, the "Services"). This Policy also covers information collected through:

- web sites we operate from which you are accessing this Policy (the "Site"),
- the software applications we make available for use on or through computers or mobile devices (the "Apps"),
- our social media pages and apps to which the Site links (collectively, our "Social Media Pages"), and
- HTML-formatted email messages we send to you that link to this Policy (collectively, including the Site, Apps, and our Social Media Pages, the "Online Systems").

This Policy also covers other means by which we collect information. For example, it also covers how we collect information from in person discussions, telephone conversations, and through non-electronic communications (i.e., collection through other means than our Online Systems).

## **PERSONAL INFORMATION WE COLLECT**

- Heruka Lifescience & Health Innovations collects information that identifies you as an individual or relates to an identifiable individual ("Personal Information") to provide Services to you, our clients and to operate our business.
- The type of Personal Information we collect about you depends on the situation at hand. We may collect Personal Information when you register to use our Online Systems, submit or build a resume, respond to employment opportunities, complete online assessments or surveys, participate in online courseware, provide Personal Information about yourself to our coaches or contact us via e-mail, electronic forms, telephone or postal mail.

- If you submit any Personal Information about other people to us or to our service providers, you represent that you have the authority to do so and to permit us to use the information in accordance with this Policy.

Please do not provide us with any Personal Information if you do not agree with this Policy.

## **HOW WE COLLECT PERSONAL INFORMATION**

- As you interact with Heruka Lifescience & Health Innovations, you provide some Personal Information directly. We may collect Personal Information when you register to use our Online Systems, submit or build a resume, respond to employment opportunities, complete online assessments or surveys, participate in online courseware, provide Personal Information about yourself to our coaches or contact us via e-mail, electronic forms, telephone or postal mail.

- If you submit any Personal Information about other people to us or to our service providers, you represent that you have the authority to do so and to permit us to use the information in accordance with this Policy.

- When someone participates in an assessment or coaching experience, they may share Personal Information about you.

- We use third-party companies to handle the sale of books, assessments, and other physical products featured on our Online Systems as well as event registration. If you wish to purchase a physical product or register for an event, you may be directed to a webpage that is hosted by the third party (or its service providers) and not by Heruka Lifescience & Health Innovations.

## **HOW WE USE THE PERSONAL INFORMATION WE COLLECT**

- Heruka Lifescience & Health Innovations, uses the Personal Information it collects in several ways. The summary below provides additional details about the ways we use the Personal Information we collect.

- We use your Personal Information to provide our Services.

- We use Personal Information to render Services to you and our clients. -

- We do this to fulfill our contractual relationships with you and our clients and where we have a legitimate, beneficial interest in using Personal Information to conduct our business.

- We may contact you from time to time regarding those opportunities.

- We may also contact individuals from time to time for referrals. You can always object to our creating a profile about you.

- If you object, we will remove your profile from our database, but this will also mean that you will not be considered for opportunities in the future.

- We use your Personal Information to respond to your inquiries and fulfill your requests. If you contact us, we keep a record of your contact

information and correspondence, and we use information you provide in your message to respond to your inquiry.

- We do so to manage our contractual relationship with you. From time to time we use your Personal Information to send you important information regarding the Online Systems, changes to our terms, conditions, policies, and other administrative information.
- We may also contact you to verify that the Personal Information we collected about you is accurate and current. We use the Personal Information to manage our contractual relationship with you or to comply with a legal obligation.
- We use your Personal Information to operate our business. such as determining the effectiveness of our promotional activities, administering our Services, maintaining and securing our infrastructure, and for procurement and financial transactions.
- We use this Personal Information to manage our contractual relationship with you and our clients, to comply with a legal obligation, and because we have a legitimate beneficial business interest.
- We may use Personal Information to conduct analytics and thought leadership materials. Any published product will refer only to larger aggregations of individuals and will not identify you personally or include any results attributable to you.
- We perform analytics because we have a legitimate beneficial business interest in doing so.
- We may retain and use Personal Information about you for research, publication, development, benchmarking and norms, validation, longitudinal studies, trend analysis, to improve and enhance our Services or to develop and market new Services.
- We may use Personal Information about you to ensure that our Services conform with legal requirements like equal opportunity laws.
- We also use your name and other personal identifiers to associate and combine information about you that is collected from one Service with information about you collected through other Services.
- We often pseudonymize or key-code your Personal Information, meaning that the personal is stripped of all information that may directly identify you and is replaced with a code to minimize unwanted or unintended identification. Such key-coded information can be de-coded by using the key so that it identifies you again.
- We may also anonymize, aggregate or de-identify Personal Information so the end-product does not identify you or any other individual. For example, we may use this information to generate norms by industry, geography, level, etc., enable us to understand where our Services are being utilized, conduct ongoing validation studies, compile reports, and publish journal articles to further the knowledge base of organizational and leadership science. Such aggregated, anonymized or de-identified information is not considered Personal Information for purposes of this Policy and we may use it for any purpose.
- We may use your Personal Information to send you information or

marketing materials. Please note that if we obtained your Personal Information because of a consulting engagement with our client, or you are using our Products at the request of your employer, you will not receive marketing materials as a result of the Personal Information we obtained from those Services.

- Heruka Lifescience & Health Innovations sends informational e-mails, articles, white papers, proposals, engagement letters, and information regarding our Services. We also use your Personal Information to conduct surveys.

- We do so either with your consent or because we have a legitimate beneficial business interest.

- Occasionally, we may desire to use your Personal Information in press releases and direct marketing materials. Before we use your Personal Information in that way, we will obtain consent from you.

## **WHO HAS ACCESS TO YOUR PERSONAL INFORMATION**

- How your Personal Information is disclosed will depend upon the situation.

- We use your Personal Information to provide our Services.

- While providing our Services, we may disclose your Personal Information to clients who have engaged our services.

- In the course of our Consulting Services and in providing our Products, we disclose Personal Information to our client. Our client can be your employer or an organization with whom you are seeking employment.

- If you have completed an assessment or survey at our client's request as part of our Consulting Services or related to a Product, we will not share your assessment results with other clients without obtaining the appropriate consent.

- From time to time, we also disclose Personal Information to our strategic alliance partners and to our network of independent consultants who provide services on Heruka Lifescience & Health Innovations behalf for the purposes stated above.

- Heruka Lifescience & Health Innovations discloses Personal Information to third parties who provide support for our Services or business operation.

- As part of providing services, these third parties will be provided with access to Personal Information. In addition, our software development partners may use Personal Information to modify, improve, refine, and validate their technology, research and development.

- Heruka Lifescience & Health Innovations may also use or disclose Personal Information (to comply with a legal obligation or because we have legitimate interest to do so) in order to: (i) comply with applicable laws, (ii) respond to inquiries, requests or orders from public or government authorities, including those outside of your country of residence, or (iii) protect the rights, privacy, safety or property, of Heruka Lifescience & Health Innovations, you or others.

- We cannot and do not assume any responsibility for the actions or omissions of third parties, such as clients, including the way they use Personal Information received either from Heruka Lifescience & Health Innovations or from other independent sources.

## **OTHER INFORMATION WE COLLECT**

Heruka Lifescience & Health Innovations collects other information that does not reveal your specific identity (“Other Information”), such as:

- Information collected through cookies, pixel tags, and other technologies,
- App usage data,
- Demographic information and other information provided by you, and
- Aggregated information.

- Because Other Information does not reveal your specific identity, we may use it for any purpose. If we combine Other Information with Personal Information that identifies you directly (like combining your name with your location), we will treat the combined information as Personal Information for as long as it is combined.

- If we are required to treat Other Information as Personal Information under applicable law, we may use and disclose it for the purposes for which we use and disclose your Personal Information as detailed in this Policy.

- We and our third-party service providers may collect Other Information in a variety of ways.

- We use “cookies” (small text files placed on a visitor’s computer hard drive) and other similar technologies to help us determine information like the type of content a visitor to the Site consumes, and the length of time each visitor spends at any area of the Site. Cookies and similar technologies enhance your experience on the Site. Please see Heruka Lifescience & Health Innovations cookie policy for more information about our use of cookies.

- You can configure your browser settings to automatically decline cookies or be given the choice of declining or accepting the transfer to your computer of a particular cookie(s) from a particular site. If you disable cookies and similar technologies, your experience on the Site may be diminished and some features may not work as intended.

## **ADDITIONAL GUIDELINES**

Heruka Lifescience & Health Innovations may from time to time sponsor special features or promotions on the Online Systems and additional privacy information may be posted. Depending on the nature of the Service being utilized, your location, or our contract with our client that may have asked you to participate in a Service, you may be asked to consent to the collection, use, transfer, and disclosure of your Personal Information. You may also be shown a privacy notice before participating in a Service. That privacy notice, to the extent it conflicts with this Policy, will govern that particular Service, feature or promotion.

## **CHOICE AND ACCESS**

Your provision of Personal Information to us is voluntary, although if you do not provide certain Personal Information you may not be able to participate in our Services.

Contact us at [office@herukahealthinnovations.com](mailto:office@herukahealthinnovations.com) if you would like to:

- ask questions about how we handle your Personal Information,
- withdraw your consent to our use of your Personal Information,
- object to our use of your Personal Information for our legitimate business interests, or
- request an electronic copy of your Personal Information for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law), request to review, correct, update, suppress or restrict the use of your Personal Information,
- To review, correct, update, suppress or restrict the use of your Personal Information, please include all relevant User IDs and e-mail addresses as well as the names of Heruka Lifescience & Health Innovations-related sites, products, or services you may have accessed in your communication to [office@herukahealthinnovations.com](mailto:office@herukahealthinnovations.com).
- Although we strive to maintain accurate Personal Information, if it is determined the Personal Information is not accurate, we will work quickly to correct it.
- To remove your Personal Information from Heruka Lifescience & Health Innovations databases, please include all relevant User IDs and e-mail addresses as well as the names of any Heruka Lifescience & Health

Innovations-related sites, products, or services you may have accessed in your communication to [office@herukahealthinnovations.com](mailto:office@herukahealthinnovations.com).

- Heruka Lifescience & Health Innovations will make reasonable attempts to delete Personal Information upon your request.
- Please note that to maintain consistency in our Services and operations, we retain backup systems. When you ask that your information be removed from Heruka Lifescience & Health Innovations databases, we may not be able to delete residual copies from our systems or from our backup systems, but they will continue to be protected as required under this Policy.

If you would like to opt-out of receiving marketing communications from us, please contact us at [office@herukahealthinnovations.com](mailto:office@herukahealthinnovations.com) to have your contact information removed from our marketing databases.

- If you request to have your information removed from our marketing databases through an email request, please include "Remove User" in the subject line of the e-mail, and include your full name, User ID, and telephone number in the body of the e-mail message.
- You can also forward a copy of the e-mail or marketing communications from which you want to opt-out.
- We will respond to your request consistent with applicable law. We may decline to process requests that in our reasonable opinion may jeopardize the privacy of others or put our intellectual property at risk.
- Please note that when we perform Services at the specific request of our client, your request may need to be directed to that client. We may only be able to provide you with a non-confidential summary of our final assessment report because these reports contain confidential client personal information that we are not allowed to disclose.
- For your protection, we may only implement requests with respect to the Personal Information associated with the email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will comply with your request as soon as reasonably practical and may need to contact you to be sure that we understand your request.
- We also may need to retain certain Personal Information about you such as your e-mail address to honor opt-out or similar requests. Please keep in mind that this residual Personal Information will remain within Heruka Lifescience & Health Innovations databases, access logs, and other records, which may or may not contain identifiable Personal Information about you. The residual Personal Information will not be used for commercial purposes. However, Heruka Lifescience & Health Innovations

reserves the right, from time to time, to recontact former users of its Services as appropriate.

## **LOCATION OF PERSONAL INFORMATION COLLECTED AND MAINTAINED**

By using our Online Systems, Services, you understand that your Personal Information may be transferred to countries outside of your country of residence, which may have different data protection rules than your country.

## **SECURITY**

Heruka Lifescience & Health Innovations has reasonable organizational, technical, and administrative measures in place to protect against the loss, misuse, and alteration of Personal Information about users of the Online Systems which is under our control. Unfortunately, however, no security system, or system of transmitting information over the Internet can be guaranteed to be 100% secure.

If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised or your user credentials are no longer secure), please immediately notify us of the problem by contacting us as described in the "Questions" section below.

## **RETENTION PERIOD**

We retain your Personal Information for as long as needed or permitted considering the purpose(s) for which it was obtained.

The criteria used to determine our retention periods include: The length of time we have an ongoing relationship with you or our client (e.g., for as long as you have an account with us or keep using the Services),

- A period beyond the time of the ongoing relationship if we have a legitimate internal operations need, such as a need to retain such information for analysis, record-keeping and compliance with data retention schedules,
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period before we can delete them), or
- Whether retention is advisable considering our legal position (such as regarding applicable statutes of limitations, litigation or regulatory investigations).

## **LINKS TO OTHER WEBSITES**

This Policy does not address, and we are not responsible for, the privacy, information, or other practices of any other third parties.



On the Online Systems, you may have the opportunity to follow a link from or to other websites or other third parties. The inclusion of a link on our Online Systems does not imply our endorsement of the linked site. Because these other websites may not be hosted or controlled by Heruka Lifescience & Health Innovations, this Policy does not address the privacy practices of those websites. We encourage you to review the privacy policies of each of those websites. Please note that we are not responsible for the collection, usage, and disclosure policies and practices (including the data security practices) of other organizations, such as LinkedIn, Facebook, Apple, Google, Microsoft or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including any Personal Information you disclose to other organizations through or in connection with the Apps or our Social Media Pages.

## **USE OF ONLINE SYSTEMS BY CHILDREN**

The Online Systems are not directed to individuals under the age of sixteen (16), and we request that these individuals do not provide their personal information through the Online Systems.

## **SUMMARIES OF POLICY**

This Policy is the sole authorized statement of Heruka Lifescience & Health Innovations practices with respect to the online collection of Personal Information through the Online Systems and the usage of Personal Information. Any summaries of this Policy generated by third party software or otherwise (for example, in connection with the "Platform for Privacy Preferences" or "P3P") have no legal effect, are in no way binding upon Heruka Lifescience & Health Innovations, cannot be relied upon in substitute for this Policy, and neither supersede nor modify this Policy.

## **QUESTIONS**

Questions regarding this Policy should be directed to Heruka Lifescience & Health Innovations at [office@herukahealthinnovations.com](mailto:office@herukahealthinnovations.com) or, if by postal mail, at Heruka Lifescience & Health Innovations, Miloja Djaka 15b, 11040 Belgrade, Serbia.

*24 September 2018*