

PRIVACY POLICY

(AVAILABLE IN FRENCH, GERMAN AND SPANISH)

We at Barrett Values Centre, LLC and our affiliated companies worldwide (“Barrett Values Centre”) are committed to respecting your online privacy and recognize your need for appropriate protection and management of any personally identifiable information (“Personal Information”) you share with us.

Barrett Values Centre has established this Online Privacy Policy so that you can understand the care with which we intend to treat your Personal Information.

Personal Information means any information that may be used to identify an individual, including, but not limited to, a first and last name, a home or other physical address and an email address or other contact information, whether at work or at home. In general, you can visit Barrett Values Centre’s Web pages without telling us who you are or revealing any Personal Information about yourself.

Barrett Values Centre strives to comply with all applicable laws around the globe that are designed to protect your privacy. Although legal requirements may vary from country to country, Barrett Values Centre intends to adhere to the principles set forth in this Online Privacy Policy even if, in connection with the above, we transfer your Personal Information from your country to countries that may not require an “adequate” level of protection for your Personal Information. In other words, our goal is to provide protection for your Personal Information no matter where that Personal Information is collected, transferred, or retained.

DISPUTE RESOLUTION

In compliance with the EU-US Privacy Shield Principles, Barrett Values Centre commits to resolve complaints about your privacy and our collection or use of your personal information. Inquiries or complaints regarding this privacy policy should first be directed to:

Chris Gomez

Director

Barrett Values Centre

PO Box 960, Waynesville, NC 28786, USA

Or via our online contact page.

If you are not satisfied with our response and have a complaint about our privacy practices, you can contact your local Data Protection Authority.

Barrett Values Centre commits to cooperate with EU data protection authorities (DPAs) and comply with the advice given by such authorities with regard to non-human resources and human resources data transferred from the EU. Barrett Values Centre is subject to the investigatory and enforcement powers of the United States Federal Trade Commission and other regulatory agencies. In some circumstances, an individual having a dispute with Barrett Values Centre may invoke binding arbitration through the Privacy Shield Panel in accordance with the Privacy Shield Framework guidance published here.

WHAT PERSONALLY-IDENTIFIABLE INFORMATION IS COLLECTED?

Barrett Values Centre collects personally-identifiable information on certain areas of the Site when users register, request publications or other information, sign up for conferences and events, and participate in user posting areas, such as bulletin boards, discussion forums, and surveys. The personally-identifiable information collected may consist of information that you provide, such as names, mailing addresses, e-mail addresses, telephone and fax numbers, and any other personally-identifiable information.

HOW MAY BARRETT VALUES CENTRE USE MY PERSONALLY-IDENTIFIABLE INFORMATION?

Barrett Values Centre uses your personally-identifiable information to fulfill your requests for information, to process your requests to participate in conferences and events, or for such other business purposes as you may initiate or request. When participating in culture or leadership surveys, Barrett Values Centre may collect information about you and certain demographic information pertaining to your employment such as position and tenure. This information will be used to produce reports and consulting services as requested by you or your organization. Barrett Values Centre will also use anonymized and aggregated survey response data for research and statistical purposes.

Cookies

COOKIES AND OTHER TRACKING TECHNOLOGIES

Some of our Web pages utilize “cookies” and other tracking technologies. A “cookie” is a small text file that may be used, for example, to collect information about Web site activity. Most browsers allow you to control cookies, including whether or not to accept them and how to remove them.

You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser, but please note that if you choose to erase or block your cookies, you will not be able to access to certain parts of the Website. These session cookies must be accepted to use the secured areas of our website.

Tracking technologies, such as weblogs, may record information such as Internet domain and host names; browser software and operating system types; clickstream patterns; and dates and times that our site is accessed. Our use of cookies and other tracking technologies allows us to improve our Website and your Web experience. We may also analyze information that does not contain Personal Information for trends and statistics. We use this information to better understand your website experience and to ensure that we are optimizing the functionality of our website and survey interfaces.

Our website also includes videos hosted by YouTube. YouTube will set cookies if you watch these videos.

By using our website, you agree that we can place these types of cookies on your device.

To protect your privacy, we have adopted the following Privacy Shield Principles.

TRADEMARK POLICY

BARRETT VALUES CENTRE, CULTURAL ENTROPY, CULTURAL TRANSFORMATION TOOLS, FULL SPECTRUM CONSCIOUSNESS, IROS, IRS, EVOLUTIONARY COACHING, AND SEVEN LEVELS OF CONSCIOUSNESS are registered trademarks of Barrett Values Centre, LLC.

NOTICE

Where Barrett Values Centre collects Personal Information on the web, we intend to post a purpose statement that explains why Personal Information will be collected and whether we plan to share such Personal Information

outside of Barrett Values Centre or those working on Barrett Values Centre's behalf. Barrett Values Centre does not intend to transfer Personal Information without your consent to third parties who are not bound to act on Barrett Values Centre's behalf unless such transfer is legally required.

For culture and leadership surveys, Barrett Values Centre will collect Personal Information as requested by you or your employer in order to conduct services and produce reports. Typical demographics may include, but are not limited to, name, age, gender, role, and tenure. Barrett Values Centre will also use anonymized and aggregated survey response data for research and statistical purposes. Your Personal Information will not be included in such uses. Survey response data that includes Personal Information may be stored by Barrett Values Centre for up to ten years in order to provide longitudinal services requested by our customers and for statistical research purposes.

DISCLOSURE

Barrett Values Centre does not sell any Personal Data gathered from individual survey respondents and does not share any Personal Data with third parties for their own marketing purposes. Personal Data collected by Barrett Values Centre is only disclosed to Barrett Values Centre's client or as directed by the client in accordance with the contractual relationship, or as otherwise set forth in this Privacy Statement.

Barrett Values Centre may disclose Personal Data to business partners and subcontractors, as necessary in connection with the performance of requested services or solutions, or as otherwise appropriate in connection with a legitimate business need. Barrett Values Centre may also disclose Personal Data where required or permitted by law, or where Barrett Values Centre believes that such disclosures are appropriate in connection with a law enforcement request.

If you have provided Personal Data to us and wish to limit our use and disclosure of that data, you can contact us using our online contact page.

CHOICE

You may choose whether or not to provide Personal Information to Barrett Values Centre. The notice we intend to provide where Barrett Values Centre collects Personal Information on the Web should help you to make this choice. If you choose not to provide the Personal Information we request,

you can still visit most of Barrett Values Centre's Web sites, but you may be unable to access certain services that involve our interaction with you.

SECURITY

Wherever your Personal Information may be held within Barrett Values Centre or on its behalf, we intend to take reasonable and appropriate steps to protect the Personal Information that you share with us from unauthorized access or disclosure. Barrett Values Centre uses third-party auditors to verify the security of our systems.

DATA INTEGRITY

Any Personal Information we may collect will be used solely for its requested purpose.

ACCESS/ACCURACY

To the extent that you do provide us with Personal Information, Barrett Values Centre wishes to keep this information up to date. Where we collect Personal Information from you on the Web, our goal is to provide a means for you to update or correct that Information. If for any reason your personal information is inaccessible, you may contact us and we will make reasonable efforts to incorporate the changes in your Personal Information that we hold as soon as practicable.

THIRD PARTY SERVICES/ONWARD TRANSFER

Barrett Values Centre shall not intentionally disclose or transfer (and shall take reasonable steps to protect the confidentiality and security, and to prevent the unauthorized or accidental disclosure of) your personally-identifiable information to third parties (i.e., persons or entities that are not affiliates of Barrett Values Centre), whether for such third parties' marketing purposes or otherwise, subject only to the following four exceptions:

1. Barrett Values Centre may disclose your personally-identifiable information to third parties in the event that such disclosure is required by the laws, rules, or regulations of any nation, state, or another applicable jurisdiction;
2. Barrett Values Centre may disclose your contact information to third parties as appropriate for Barrett Values Centre to make

transmissions or deliveries to you;

3. Barrett Values Centre may disclose your personally-identifiable information if, in connection with submitting the information, you consent to such disclosure; and
4. Barrett Values Centre may disclose contact information for you in response to inquiries by bonafide rights owners in connection with allegations of infringement of copyright or other proprietary rights arising from information you have posted on the Site or otherwise provided to Barrett Values Centre.

For instances where onward transfer does occur, BVC assures and takes responsibility that third parties properly process personal data of EU individuals received pursuant to Privacy Shield.

LINKS TO THIRD-PARTY SITES

We may provide links to third-party Web sites as a service to our users. In addition, some of the content appearing to be on this Site is in fact supplied by third parties, for example, in instances of framing of third-party Web sites or incorporation through framesets of content supplied by third-party servers. Please be aware that we cannot control and are not responsible for the information collection practices of such third-party Web sites, which may differ from those of this Site. We encourage you to review and understand the privacy policies on these Web sites before providing any information to them.

CHILDREN'S PRIVACY

Valuescenter.com is not structured to attract children. Accordingly, we do not intend to collect Personal Information from anyone we know to be under 13 years of age.

COMMITMENT

We are committed to privacy and are actively utilizing current industry initiatives to preserve individual privacy rights on the Internet. Protecting your privacy online is an evolving area, and Barrett Values Centre's Web sites are constantly evolving to meet these demands.

Barrett Values Centre complies with the Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use,

and retention of personal information from European Union member countries and the United Kingdom. Barrett Values Centre has certified that it adheres to the Privacy Shield Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. Please [click here](#) to learn more about the Privacy Shield program, and to view Barrett Values Centre's certification.

If you have any comments or questions regarding our Online Privacy Policy, please contact us.

YOUR CONSENT

By using this Website, you consent to the terms of our Online Privacy Policy and to Barrett Values Centre's processing of Personal Information for the purposes given above as well as those explained where Barrett Values Centre collects Personal Information on the Web. Should the Online Privacy Policy change, we intend to take every reasonable step to ensure that these changes are brought to your attention by posting all changes prominently on our website for a reasonable period of time.

ACCESSIBILITY POLICY

Barrett Values Centre is committed to making its website accessible to all users, and we have included several features designed to improve accessibility for users with disabilities. Some of these features are described below.

Images on the site contain "alt tags" with descriptions of the image, which aid users who listen to the content of the site by using a screen reader, rather than reading the site.

Articles and other special publications that are made available on the Website are generally available in HTML. In some cases, we may publish a document using Adobe Portable Document Format (PDF). Barrett Values Centre welcomes comments on how to improve the site's accessibility for users with disabilities.

If you use assistive technology and the format of any material on our websites interfere with your ability to access the information, please use the following point of contact for assistance. To enable us to respond in a manner most helpful to you, please indicate the nature of your accessibility

problem, the preferred format in which to receive the material, the web address of the requested material, and your contact information.

If you have any comments or questions regarding our Online Accessibility Policy, please contact us.