

Data Privacy Policy

You take good care of your data. Always.

Welcome to structures® assessments.

As an assessment provider, structures® ApS provides our customers with assessment tools plus related documents and webshop services available on our software platform structures.solutions.

This Data Privacy Policy explains how structures ApS handles your data and your personal information.

This Data Privacy Policy applies to information collected on our sites www.structures.com and www.structures.solutions, as well as to all of our software systems, except where otherwise noted by a separate unique privacy policy.

We refer to all our software platforms, services, and sites collectively as our “Services.” This Data Privacy Policy sets out how we use your information in the delivery of our Sites and Services.

This Data Privacy Policy does not speak to the practices of any third parties, including those of our partners who may display structures® branding on their sites.

The use of information collected through our service platform shall be limited to the purpose of providing the service for which the Customer has engaged structures ApS.

Privacy FAQs:

If You Answer Assessments

- **Who administers and controls the data?** We are a service provider of assessments, collecting and processing data and building insights on request from our customers. We build the assessments and make them available to our customers. We also store the data collected, and some of these data can be used for cross data analysis across types of companies and assessments.
- **Are anonymous responses anonymous?**
 - Yes, your answers in aggregate reports are anonymous and cannot be traced back to you.
 - No, your answers in individual reports may be shared with you and another appointed recipient, e.g. your manager. An individual report is only shared with the appointed recipient upon your consent.
- **Are your responses sold to a third party?** Structures ApS does not sell or share your assessment responses with third party advertisers or marketers. We control your response data, and we serve our customers with data collection, data processing, data analysis and reporting.
- **What information may we get on respondents**
 - Respondent answers on assessments
 - Email – either provided by the respondent or provided by our customers as e-mail lists info for upload and distribution of assessments.
 - Customer + Respondent Information collected from tracking technologies:
- Usage info like visitor logs, IP address, cookies, etc.
- Which device has been used, e.g. browser, OS, etc.
- Which source or link referred respondent to assessment.
- Page tag data, like clear gifs, web beacons, and web bugs.

Your Rights

As a respondent and/or customer, you are provided specific rights in regard to the handling of your data in the cases, where they can be traced back to you. You may request the following from the data controller:

- The right to be informed – you may request details of what we collect and what we or our customers do with your data.
- The right of access – you may request a copy of the personal data we hold on you.
- The right to rectification – you may request that we correct the data we have on file for you.
- The right to erasure – you may request that your data be deleted in portions or in its entirety.
- The right to restrict processing – you may restrict the processing of your data to specific purposes.
- The right to data portability – you may request your personal data in a csv format for transfer to another system
- The right to object – you may object to your data being processed for purposes to which you do not consent.
- Rights in relation to automated decision making and profiling – you may restrict your data from being used in automated decision making and profiling applications.

You may wish to exercise a right to obtain information about yourself or to correct, update or delete that information.

Some of these rights may be subject to some exceptions or limitations in local law.

Please note your rights and choices vary depending upon your location. We will take reasonable steps to verify your identity and we will respond to your request to exercise these rights within a reasonable time (and in all

cases within 30 days of receiving a request). If you wish to exercise those rights, please contact mail@structures.com att. The Data Processing Controller.

Structures ApS stores all data in the EU (Germany & Ireland).

Issue Resolution

- structures ApS is committed to complying with international regulations including GDPR.
- structures® commits to resolve complaints about our collection or use of your personal information.
- GDPR-related inquiries or complaints regarding our privacy policies should first contact The Data Processing Controller by sending a mail to contact mail@structures.com att. The Data Processing Controller.

What kind of information do we collect?

Customer Information:

When you answer an assessment, you may be asked to enter your email address, so that we can send you your personal report afterwards.

We may also receive a list of email addresses including yours from your employer with the aim of enabling us to send you links to answer an assessment.

If you are one of our Customers and certified users, we may ask for and store your name and contact information, including: company name, name of contact, title of contact, company address, telephone number, email address, user name and password, and billing information which may include credit card numbers.

We do not store any credit card information. Instead we use a third-party service as a credit card processor.

Customers also provide us with information regarding the ordered Services. In addition to the information you actively provide to us, we also collect information from other sources regarding when and how often you log on to our Site. (See “Tracking Technologies” below.)

Information collected may be processed by contracted 3rd parties to assist with accounting, customer management, and compliance.

All customer data transfers from structures® to third parties require a data processing agreement which restricts how the information may be used.

Respondent Information:

We receive Respondent Information from assessment respondents. Your employer or our Customer may provide us with your email address to use for email distribution methods; alternatively, you may provide us with your email address in situations, where you answer an assessment and the resulting report should be sent directly to you

If we receive your email from your employer or our Customers, we contractually require them to warrant for the permission to share your email information.

Assessment Respondents provide us with the information requested in the assessments, that focus on work-related, organizational aspects.

As one of our assessment features, we can record: (i) if and when a Respondent has responded to an assessment and (ii) if and when a Respondent has received a reminder.

In addition, we may receive any information contained in communications a Respondent makes directly with structures. (See “Tracking Technologies” below.)

We will never use Respondent Information for any purpose other than to provide services to our Customers.

We log Customer and Respondent Internet Protocol (IP) addresses to confirm the accuracy of assessment data and Respondent IP addresses are also converted into geo-data for Customers within our software.

For our software system administration purposes, we also log a user's session so that we know when, how often and what pages of the Site a user visits.

To avoid the need to re-insert your username and password every time Customers or Respondents move from one page of our Site to the next, we may use a cookie. (See "Tracking Technologies" below.)

We also collect information from our Customers and Respondents regarding the devices and applications used to access our services (like browser type and operating system) and referral sources (if you arrived from another website or email).

You can login to our site using third party sign-in services such as Google Accounts Authentication and Authorization. These services authenticate your identity and give you the choice to share certain types of personal information with us (like your name and email address) to pre-populate your login.

Our site includes social media features as part of our distribution methods. These features, including the Facebook Post or Twitter Post buttons, may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. These features are hosted by a third-party social media network (like Twitter or Facebook). Your interactions with these features are governed by those third-party social media networks' privacy policies.

Customers get reports and business analyses from using our software services. As a service provider for our Customers, structures® acts as a custodian for that information. structures® provides features and services for Customers to provide notice to their Respondents or customers concerning the legal accountability for the collection of information. To protect the privacy of our Customers, we cannot disclose private information to Respondents about our Customers' accounts.

Tracking Technologies We May Use on Our Sites and Services Platforms

Cookie Policy

Please read this Cookie Policy before you use our Site or provide information on or through this Site. Your use of this Site signifies that you agree with this Cookie Policy. If you disagree with any part of this Cookie Policy, please do not use the Site.

Like most other websites, structures® may use “cookies” to collect data about visitors.

Cookies are alphanumeric identifiers stored on your computer’s hard drive through your Web browser for the purpose of identifying you when you visit a site or page. Cookies enable us to recognize your browser when you visit and to tell us whether you and other visitors have visited the Site previously.

Your cookies are tied to personally identifiable information (like your email address). If you have entered your name or other contact information to structures® in an assessment or any other web-based interaction, we are able to tie that information back to the cookie.

Cookies can be either temporary session cookies that expire at the end of a user session when the browser is closed, or persistent cookies that remain on your hard drive for an extended period of time. We may use persistent cookies.

We may set cookies when you visit our web site, use our application, and take an assessment. Cookies are used to:

- Identify whether a user is logged in, for security purposes, and to allow the use of software features
- Allow us to see how visitors use our site (these may be third party cookies like Google Analytics)
- Identify a unique assessment response when you are a Respondent taking an assessment

You can change the settings on your browser to prevent new cookies from being set, or to notify you when a new cookie is set.

Each browser is different, but the Help section for the browser will be able to show you how to change cookie preferences or clear your cookies from time to time. If you do block cookies it may impact your experience and you may not be able to take advantage of all features of our software.

Clear Gifs (Web Beacons/Web Bugs)

We may use software features that will enable clear gifs (a.k.a. Web Beacons/Web Bugs) in assessment distribution through emails to Assessment Respondents.

Clear gifs are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of Web users. In contrast to cookies, which are stored on a user's computer hard drive, clear gifs are embedded invisibly on Web pages and are about the size of the period at the end of this sentence.

structures® may also use clear gifs in our HTML-based emails to Customers and Respondents to let us know which emails have been opened by recipients.

This allows us to gauge the effectiveness of certain communications and the effectiveness of our assessment services.

Integrations

Our digital services may include a variety of integrations with third party services. These integrations may use your account information with the third party, collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Integration to function properly. Integrations are either hosted by a third party or hosted directly on our Site. Your interactions with these Integrations are governed by the privacy policy of the third-party company providing the Integration.

Communication Forums

If you use any forums associated with our site, keep in mind that any personally, identifiable information you submit there can be read, collected, or used by other users, and could be used to send you unsolicited messages.

We are not responsible for the personally identifiable information you choose to submit in these forums or blog comments.

How we use the information we collect

We use Customer Information in our normal course of business, including to contact you regarding technical support, discuss billing issues, or to bring to your attention any aspect of our mutual business.

We may also use Customer contact information to provide you with policy or product updates or to introduce new products and services provided you have indicated that you do not object to being contacted for these purposes.

If you do not wish to receive promotional emails from us, you can tell us not to either at the point such information is collected (by checking or unchecking (as directed) the relevant box) or by following the unsubscribe instructions included in each promotional email.

We send service-related announcements when necessary to do so, and generally, you may not opt-out of these communications, which are not promotional in nature.

All Respondent Information is stored in our databases for our Customers' benefit.

At your direction, we use a Respondent's email address (and at your option other contact information) to send assessment invitations, reminders, and whatever other communications chosen to use.

We also use Respondent Information to improve the performance of our Site and services by analysing site and user behaviour, troubleshooting

technical problems, resolving disputes, and addressing complaints, and addressing compliance issues with our Terms of Service.

We collect and process information as a service required by our Customers. If you are a Respondent of one of our Customers and would no longer like to be contacted by one of our Customers that use our service, please contact that Customer directly.

Our Staff's Access to Information

Our staff will only access your data at a minimum necessary standard, in order to provide technical and administrative support and data analytics and reporting services.

Data Retention + Deletion / Destruction

struqtures® stores data that we process as a service ordered by our Customers and data, we collect from our Customers directly for as long as it is needed to provide services to our Customers.

struqtures® will store and use this data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Occasionally, data needs to be completely destroyed after its intended use. In most cases, this makes the loss retrievable in the event of a mistake.

Links to Other Sites

Our site may contain links to other sites that are not owned or controlled struqtures.

Please be aware that we, Struqtures, are not responsible for the privacy practices of such other sites.

We encourage you to be aware when you leave our site and to read the privacy statements of each and every website that collects personally identifiable information.

Who we share or disclose information to?

We do not share information with any third parties except under the following very limited circumstances with the following protections:

1. **Respondent Information with Customer:** Our business is providing services allow you, our Customer, to offer professional services with others. Accordingly, we provide you with access to the reports and insights, that relates to Respondent Information given in answer to the assessments you have requested from us.
2. **As Customers and Respondents Choose:** We may share or otherwise use your Customer Information as you choose, and we may share Respondent Information as both you and the Assessment Respondent choose. For example, if you choose to have an email action send a copy of the assessment response to another party.
3. **Agents Acting on Our Behalf:** We may share some of your Information with other companies who provide us with technical and other type of services such as a credit card processor or data hosting center. They are contractually bound under nondisclosure agreements and are granted access to only Information that is necessary for their jobs, and are prohibited from using Information for any other purpose (including marketing or sharing the Information with any other party). We do not share any personally identifiable information with third parties who are not services providers who have signed confidentiality agreements to perform services for us.
4. **For Legal Reasons:** We are required by law to respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims. We may also share your Information to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our terms of use, or as otherwise required by law.

5. **Affiliates and Acquisition:** We may share Information with our affiliated companies, products, and services or during any real or potential acquisition or merger of our company by or with another. We will notify you if your Information becomes subject to a different privacy policy.

Data archiving / Deletion

Once a Respondent has submitted an assessment, the Respondent may not be able to access his/her Information through the Site.

We can allow Assessment Respondents to re-access assessment responses, but that must be enabled by the structures. Respondents may contact the Customer or structures directly, and the Customer may, where appropriate, work with us in modifying such Information.

Data security

We have extensive security measures in place to protect your Information, and we are committed to the protection of your data.

Unique user names and passwords must be entered each time a person logs on.

We work with a third-party Tier 1 service provider, Qualtrics, to host our Services in a secure production environment that uses a firewall and other technology to reasonably prevent access from outside intruders.

When transmitting sensitive Information, we also have encryption technology available for your use.

All of our technology and processes are not, however, guarantees of security. You should also bear in mind that submission of information over the internet is never entirely secure.

We cannot guarantee the security of information you submit via the Site whilst it is in transit over the internet and any such submission is at your own risk.

Customer Ownership Transfer

If you transfer your Customer billing information and point of contact information (e.g. the individual who registers as a Customer or a certified user designated within our application as a Customer) to another individual or organization, ownership over all of your account's data is therefore transferred to that individual or organization.

This data may include confidential information, reports and tailor-made services or add-ons to our services, that you may have purchased from us.

Changes in the Privacy Policy

As we are constantly improving our services and expanding our business, we reserve the right to modify this privacy policy at any time.

In the event we make such changes, we will post the new policy on this Site with an update date. We encourage you to frequently review this page for the latest information on our privacy practices.

Effective: May 25, 2018

Updated: January 10th, 2025