

Privacy statement

Creatingculturaladvantage.com is owned by CMC Culture & Management Consulting

CMC processes your data with due care, in accordance with all applicable laws and regulations. Our Privacy Statement explains what data we process, how we do that and how you may use your rights as a data subject (e.g., right to object, right of access). This Privacy Statement may be updated from time to time. You can find the current version on our website creatingculturaladvantage.com. This Privacy Statement applies to all personal data that CMC processes during the execution of our online services, including the personal data of visitors of the creatingculturaladvantage.com website. This Privacy Statement only covers data processing carried out by CMC. The Privacy Statement does not address, and we are not responsible for, the privacy practices of any third parties.

1. The identity of the controller of the processing of your personal data

The controller of the processing of the personal information is:

Name: Danaë Huijser, CMC Culture & Management Consulting

Registered: Chamber of Commerce Amsterdam, the Netherlands, 09082110

Correspondence address: Zandvoorter Allee 2, 2106 BW Heemstede, the Netherlands

Telephone number: +316 525 11 044

E-mail address: info@cmc-eu.com

Site: www.cmc-eu.com

2. Personal data processed and sources of data

CMC collects two types of information from our Users: (i) User Data; and (ii) Technical Data. Although we do not normally use Technical Data to identify you as an individual, you can sometimes be recognized from it. In such situations, Technical Data can also be considered personal data under applicable laws.

We collect and process the following User Data about our participants (participants are visitors who login to our website creatingculturaladvantage.com to use one or more of our online assessments): (i) first and last name; (ii) name of the organisation they work, (iii) email address, (iv) information that participants provide when using our online assessment services; scores on PCP – Personal Cultural Profile, BC – Business Case, ACI – Applied Cultural Intelligence assessment, CCS – Corporate Culture Scan or Omoiari Scan.

We and/or our authorized third party service providers may automatically collect Technical Data when you visit or interact with our services or sites. Technical Data may include the browser name, the type of computer or device, time spent on website, the time and date of user visits, IP address, operating system and the Internet service providers utilized and other similar technical information.

Cookies

We use various technologies to collect and store information when you visit the creatingculturaladvantage.com website, including cookies. Cookies allow us to calculate the aggregate number of people visiting our websites and monitor the use of the website. This helps us to improve our website and better serve our users. We also use cookies that make the use of the website easier for you, for example by remembering usernames, passwords and (language) preferences.

You may choose to set your web browser to refuse cookies or to alert you when cookies are being sent. If you do so, note that some parts of our sites and services may not function properly.

3. Purposes and legitimate grounds for the processing of your personal data

Purposes

CMC processes your personal data in the first place to be able to deliver our services to you and to run, maintain and develop our services. Based on participant's personal data input, participants will receive an automated email with – depending on the online assessment they participated in - a PDF file attached or a personalized email, summarizing your personal scores. The CCS – Corporate Culture Scan and Omoiari Scan only collect aggregate scores (non-personally identifiable data). The use of the PCP – Personal Cultural Profile results in an email with attached PDF file with a personal PCP report. The BC - Business Case results in an email summarizing your scenario choices. The ACI Applied Cultural Intelligence assessment sends out an automated email with participant's scores. Automated emails are sent out to the email address provided by the participants. A copy is sent to the moderator (who provided the participant with account details). Personal data is also stored in our database.

For customer communication (including marketing)

CMC does not process your personal data to contact you for marketing purposes.

For quality improvement and trend analysis

We may process information about your use of the services to improve the quality of our services, e.g., by analyzing any trends in the use of our services. When possible, we will do this using only aggregated, non-personally identifiable data.

Legitimate grounds for processing

CMC processes your personal data to perform our contractual obligations towards you as our participant and your employer, our customer. We do this based on your explicit consent to do so. If you do not wish to submit your personal data and/or your scores, you cannot use our services. By either not login in, and therefore not gaining access to the online assessments, or by not submitting your data at the end of an assessment, we cannot deliver your scores (and will not save them anywhere).

4. Transfer to countries outside Europe

CMC may transfer your personal data to countries outside the European Union and the European Economic Area if a participant or customer is located outside the EU or EEA. When we transfer any data to a country for which no adequacy decision of the European Commission exists, such transfer will be subject to the provisions of the (standard or other) clauses adopted by the European Commission. If you wish to know more about international transfers of your personal data, you may contact us via the contact details above.

5. Recipients & Third parties

We only share your personal data within the organization of CMC if and as far as reasonably necessary to perform and develop our services, e.g. with our moderators who submit the account details to their participants.

We do not share your personal data with third parties outside of CMC.

6. Storage period

CMC does not store your personal data longer than is legally permitted and necessary for the purposes for which the data were collected. The storage period depends on the nature of the information and the purposes of processing. The maximum period may, therefore, vary per use. In general, we store data for the provision of services for a maximum of one year after our relation ended. Our database does store and process non-personally identifiable PCP scores based on participant's nationality in order to run, maintain and develop our services.

7. Your rights

Right to access

CMC offers you access to the personal data we process. This means you can contact us asking us to inform you about your personal data that we have collected and processed and the purposes such data are used for.

Right to correct

You have the right to have incorrect/unprecise, incomplete, outdated, or unnecessary personal data we have stored about you corrected or completed by contacting us.

Right to deletion

You may also ask us to delete your personal data from our systems. We will comply with such request unless we have a legitimate ground to not delete the data. After the data have been deleted, we may not immediately be able to delete all residual copies from our active servers and backup systems.

Right to object

You may object to certain use of your personal data if such data are processed for other purposes than necessary for the performance of our services or for compliance with a legal obligation. You may also object any further processing of your personal data after prior given consent. If you object to the further processing of your personal data, this may lead to fewer possibilities to use our website and other services.

Right to restriction of processing

You may request us to restrict certain processing of your personal data. If you restrict certain processing of your personal data, this may lead to fewer possibilities to use our website and other services.

Right to data portability

You have the right to receive your personal data from us in a structured, commonly used format in order to transmit the data to another controller.

How to use your rights

You may use these rights by sending a letter or e-mail, including your name, address, phone number and a copy of a valid ID to us on the address set out above. If your request regards personal data in a cookie, you have to enclose a copy of the said cookie. We may request the provision of additional information necessary to confirm your identity. We may reject requests that are unreasonably repetitive, excessive or manifestly unfounded. In case you consider our processing activities of your personal data to be inconsistent with the applicable data protection laws, you may lodge a complaint with the local supervisory authority for data protection.

8. Information security

All personal data is stored securely in accordance with the EU General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR).

We will take all reasonable, appropriate security measures to protect CMC and our customers from unauthorized access to or unauthorized alteration, disclosure or destruction of personal data we hold. Measures include, where appropriate, encryption, firewalls, secure facilities and access rights systems. Should despite of the security measures, a security breach occur that is likely to have negative effects to your privacy, we will inform you about the breach as soon as reasonably possible.

9. Applicability and changes

Our Privacy Statement applies worldwide, to all of the services offered by CMC. This Privacy Statement is published in English, the English version is always decisive and binding. Our Privacy Statement may change from time to time. You can find the current version on our website creatingculturaladvantage.com. We will not make substantial changes to this Privacy Statement or reduce your rights under this Privacy Statement without providing you with a notice.

Thank you for reading our Privacy Policy. Your privacy is important to us.