

Introduction

This GDPR Statement explains, in clear narrative form, how Way to Grow Inc., LLC d/b/a The Developmental Edge® (“The Developmental Edge,” “we,” “our,” or “us”) complies with the General Data Protection Regulation (GDPR), the UK GDPR, and related European data-protection laws. It applies to all individuals located in the European Economic Area (EEA), the United Kingdom (UK), and Switzerland who visit our website, use the Developmental Sprint® E-Tool, participate in Developmental Workout™, engage in coaching or workshops, or otherwise interact with our digital services.

We are committed to GDPR principles including transparency, data minimization, purpose limitation, accuracy, storage limitation, security, and accountability. This 2025 version expands upon our 2023 policy by incorporating updated requirements for international data transfers, AI transparency, SaaS operational roles, and subprocessors.

Our GDPR Compliance Approach

The Developmental Edge® maintains GDPR compliance by limiting the personal data we collect, establishing lawful bases for processing, implementing strong technical and organizational safeguards, honoring user rights, and retaining personal data only for appropriate durations. We conduct routine reviews of our practices to ensure continued alignment with evolving European regulatory standards.

Personal Data We Collect and How We Collect It

We collect personal data directly when users provide information through web forms, account registration, program participation, AI-assisted developmental tools, or direct communication with our team. This may include name, email address, phone number, job role, organization, optional profile details, and developmental content such as ITC Maps, Experiments, and Developmental Workout™ entries.

We also collect technical information automatically when users access our website or platform, including IP addresses, browser type, device identifiers, session logs, time-stamps, and cookie preferences. Cookies and tracking technologies—managed through Cookiebot—help us secure the platform and understand usage patterns. Users may adjust their cookie preferences at any time.

How Long We Retain Personal Data

Personal data is retained according to our global Data Retention Policy. In summary, we retain user accounts and developmental content for the duration of an organization’s contract and for at least

twelve months after contract termination, unless earlier deletion is requested. Users receive three advance notices before deletion occurs. All personally identifiable information is then permanently deleted, and remaining developmental data is anonymized and may be retained for aggregated analysis or research. Log data, diagnostic data, and backup data are retained only as long as necessary to fulfill security and operational responsibilities.

Children's Privacy

Our services are not designed for children unless a school or educational institution contracts directly with us and obtains appropriate consent under applicable laws such as FERPA, PPRA, and GDPR. In such cases, we process student data solely under institutional direction and delete it upon request by the authorized school official.

Legal Bases for Processing

Depending on the context, we rely on one or more lawful bases under GDPR and UK GDPR, including:

- Contractual necessity, when delivering services users sign up for
- Legitimate interests, including platform security, fraud prevention, analytics, and service improvement
- Consent, particularly for marketing communications and cookies
- Legal obligations, when processing is required to comply with laws
- Processor responsibilities, when acting under a contract with an organizational client

Role As Controller And Processor

The Developmental Edge® may act as a Data Controller or a Data Processor:

- We act as a Controller when individuals independently interact with our website, sign up for accounts, or communicate directly with us.
- We act as a Processor when organizations enroll participants or manage user accounts within the Developmental Sprint® E-Tool.

Regardless of our role, we maintain strong data protection and follow all GDPR requirements.

AI Usage and Compliance

Our Services may include optional AI-supported features, including developmental guidance or suggestions generated via the OpenAI API. When you use AI-enabled features, your inputs are transmitted securely to the OpenAI API for the sole purpose of generating a response. OpenAI does not use API-submitted data to train its models, and we do not use AI for automated decision-making

or evaluation of users. AI-generated content is advisory, and users remain responsible for reviewing all outputs.

Subprocessors

We may engage carefully vetted subprocessors to support hosting, storage, analytics, security, video hosting, email communication, and AI processing. These subprocessors include: Amazon Web Services, MongoDB, Pantheon.io, HubSpot, Mailchimp, OneTap, Vimeo, YouTube, Cloudflare, RegFox, Cookiebot, CleanTalk, WordPress, Google, and OpenAI.

Each Subprocessor is bound by a written data processing agreement requiring strong privacy and security safeguards and GDPR-compliant obligations.

International Data Transfers

If you are located within the EEA when you visit our Website or use our Application or our Services, we may transfer your personal data outside of the EEA. When we do, we will ensure that an adequate level of protection is provided for the information by using industry-standard encryption at rest and in transit. Visit our Privacy Policy to learn more about the technical and operational measures we implement and our compliance with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework.

Your Data Protection Rights Under GDPR

If you are a resident of the European Union, you have certain data protection rights under the GDPR. The Developmental Edge will take reasonable steps to allow you to access, review, update, rectify, or delete any personal data we hold about you.

In certain circumstances, you have the following data protection rights:

- Right of access. The right to obtain access to your personal data.
- Right to rectification. The right to erase or rectify inaccurate or incomplete data.
- Right to erasure. The right to obtain the erasure of your personal data in certain circumstances.
- Right to portability. The right to move, copy, or transfer personal data.
- Right to restrict processing. The right to restrict processing of personal data.
- Right to object to processing. The right to object to processing of personal data for certain purposes.

If you wish to exercise one of these rights, please contact us by using the contact details below. We may ask you to verify your identity before responding to these requests.

Direct Marketing

You may opt-out of receiving marketing communications at any time by unsubscribing from email marketing, by changing your notification settings in The Developmental Edge application or by opting-out of any emails we may send to you.

Changes To This GDPR Statement

We may update this GDPR Statement to reflect changes in our practices, evolving regulations, or updates to international transfer frameworks. Updated versions will be posted with a revised “Last Updated” date. In cases of significant change, additional notice may be provided.

How To Contact Us

If you have any questions about this GDPR Statement, you may contact us online, via email to info@developmentaledge.com, or you can send correspondence to the following addresses:

Way to Grow INC, LLC d/b/a The Developmental Edge
Attn: Legal
2897 North Druid Hill Rd NE #307
Atlanta, GA 30329

If contacting us does not provide you with an adequate resolution and your inquiry is related to information collected about you in the European Union/European Economic Area, please contact the applicable EU Data Protection Authority.