

## A Brief Summary of Our Privacy Policy

Our Privacy Policy applies to your use of The Developmental Edge® website (“our Website”), DEVELOPMENTAL SPRINT® (“our Application”), which is our proprietary application, and any of the other web or application based services operated or offered by The Developmental Edge (“our Services”). This Privacy Policy applies to all visitors to our Website and customers and users of our Application and our Services.

## Who We Are

Way to Grow INC, LLC d/b/a The Developmental Edge (“The Developmental Edge”) provides consulting and advisory services in the field of business leadership development, business organization and business management and provides workshops and seminars in the field of self and organizational improvement, fulfillment, and communication for personal, group, and organizational change.

## About Our Privacy Policy

When you access our Website or use our Application or our Services, information is created. Because we know your privacy is important, we’ve created this Privacy Policy to explain how we collect, use and protect that information. For your convenience, we’ve provided a brief summary below, written in simple, easy to understand text. If you’d like to read our full Privacy Policy, please continue reading.

## What information do we collect?

- User provided: Contact information (name, email, phone number, job title, company name, payment information, and other information provided by the user) to request a demo or trial or to sign up for a user account or subscription, and to access and use our Application and our Services.
- Automatically collected: IP Address, user agent, and the referring URL. When you visit our Website we automatically receive your IP address and information such as the user-agent of your web browser. This information is provided to us and every other website that you visit on the Internet by your web browser.

## What information do we know about you?

We don’t request or require you to provide personal information to access our Website. As noted above, we may receive your IP address and user agent automatically. If you optionally elect to use

our chat feature or fill out our information request form, we will receive your Name, Email, Phone number, and Company name as well as your stated interest in our products. If you sign up for a user account or subscription, we will collect your contact information (name, email, phone number, job title, company name, payment information, and other information provided by the user).

## What about cookies?

Our Website, our Application and our Services may place cookies on your browser in order to identify you when you return to our Website or log in to use our Application or Services. The Developmental Edge's cookie policy can be found [here](#).

## How do we use the information we collect?

- We use aggregate information to understand how many total users have visited our Website and the types of devices on which they are using it.
- We use information you choose to provide in our web forms to sell and/or deliver products and/or services.
- We use information you provide to us when signing up for and using our services to provide services and to correspond with you about those services.

## Do we sell any of the information collected by our Website?

No. We don't sell or rent the information to any third parties.

## Do we share any customer data?

We may share data with our vendors and service providers to perform tasks on our behalf.

## What's the difference between personal information and aggregate information?

Personal information is information that can be used to identify a particular individual, generally understood to be information such as your name, physical address, email address and phone number. Aggregate information is not considered personal information and can't be used to identify you.

## Do we collect email addresses?

We do not require you to submit your email address, or any other personal information, to us in order to use our Website. If you use the information provided on our Website to contact us directly or to use our Application and Services, we will receive your contact information, but will only use it in order to respond to your inquiry or to deliver Services. If you fill out a web form on our Website, we receive your email and may store that email and associated contact information if you opt in to our database.

For more detailed information, please click the links below to visit sections of our full Privacy Policy:

## Way to Grow INC, LLC d/b/a The Developmental Edge, ("The Developmental Edge") - Privacy Policy

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## Introduction

This Privacy Policy covers how The Developmental Edge collects, uses, discloses and stores information about you when you use The Developmental Edge website ("our Website"), DEVELOPMENTAL SPRINT® ("our Application"), which is our proprietary application, and any of the

other web or application based services operated or offered by The Developmental Edge (“our Services”).

## What Information We Collect and How We Collect It

In order to provide our services to you and to ensure that our Website, our Application and our Services operate correctly, we collect various types of information, including information that identifies you or may identify you as an individual (“personal information”). When you use our Website, sign up to use or use our Application or our Services, we collect the following information:

Information you provide to us:

- If you use the contact information provided on our Website to contact us directly, you agree to allow The Developmental Edge to store and process your contact information. We will receive your contact information which could include, depending on how you contact us, your email address, name, company name, job title, the reason for contacting, and postal address, among other information you volunteer.
- We receive and store the information you provide directly to us when you sign up for and use our Services and our Application. The types of information we may collect directly from our customers and users include name, email address, mailing address, phone number, job title, payment and billing information, self-reflection entries, and any other information provided by the user (including a user-submitted photograph if a user chooses to provide one).

When you use our Website, our Application or our Services, we automatically collect the following information:

- Internet Protocol Address (“IP address”). IP addresses are assigned by your Internet service provider (e.g., Comcast/Xfinity, AT&T, Time Warner, Verizon, Charter, etc.) to the modem used to access the Internet for connected devices in your home and/or work-place. Any devices using the modem to access the Internet may broadcast the same IP address. At home, connected devices could include one or more laptop/desktop computers, tablets, mobile phones, smart/connected TVs and gaming consoles. At work, connected devices could include one (or all) floor(s) in an office building. Our Website, our Application and our Services receives your IP address from your Internet browser each time you request a file or web page.
- User-Agent. Due to the nature of how the Internet works, we may receive information (known as “User-Agent”) automatically sent by your web browser, such as data associated with the source device’s Internet browser/content delivery software (e.g., Microsoft Explorer, Mozilla Firefox or Google Chrome). The User-Agent information we receive may also include



information such as device type (e.g., computer, tablet, mobile device), and/or date/time of visit. Similar to the collection of IP addresses, our Website, our Application and our Services also receives User-Agent information associated with your browser and type of device.

- Information collected by cookies and other similar technologies. We use various technologies to collect information which may include saving cookies to users' computers. These tools help us understand and improve the performance of our Website, our Application and our Services. Our cookie policy can be found [here](#).

## How We Use the Information We Collect

- **Services.** We may use the information we collect in connection with the services we provide. We may use the information we collect to set up user accounts; provide, operate, and maintain services; process and complete transactions; provide customer service and support and respond to inquiries; to send communications; to prevent fraudulent activity; and for any other purpose based on our legitimate interest.
- **Administration and Improvement.** We may use the information we collect to administer and improve our Website, our Application and our Services.
- **Promotional Communications.** We may use your personal information to contact you with newsletters, marketing, or promotional materials and other information that may be of interest to you. You may opt-out of receiving any, or all, of these communications from us by following the instructions provided in any email we send or by following the unsubscribe link in those emails.
- **Analytics.** We may use aggregated information that's collected to understand general information and trends related to our Website, our Application or our Services, such as how many users have visited during a given period of time, and the types of devices the visitors use. The information can't be used to identify an individual and is used by us to help improve the solution for consumers.
- **IP addresses – Fraud Prevention.** Our use of IP addresses is limited to helping identify and combat potentially fraudulent activity. IP addresses are stored in our log-files.
- **Respond to Inquiries.** If you choose to contact us directly (by email, web form, or postal mail) using the contact information we provide on our Website, we will use your contact information to respond to your inquiry.

## Cookies

Our Website, our Application and our Services may place cookies on your browser in order to identify you when you return or log in. Our cookie policy can be found [here](#).

## With Whom We Share Information

We will not rent, sell or share information about you with other people or non-affiliated companies.

We may share and disclose information (including personal information) in the following instances:

- Vendors and Service Providers. We may share your information with vendors and service providers whom we engage to perform tasks on our behalf. More details about these vendors and service providers can be found in our [GDPR Statement](#).
- If The Developmental Edge is acquired or merged with another company, we will transfer collected information to the acquiring company.
- Under certain circumstances, we may be required to disclose personal information if necessary to comply with a subpoena or court order, to establish or exercise our legal rights or defend against legal claims, or to cooperate with government and/or law enforcement officials.

We may share aggregated information (i.e., information that cannot be used to identify an individual) for a variety of reasons, including under the following circumstances:

- To make our product better and foster transparency.
- To provide client organizations with aggregated, anonymized cohort-level insights for employees accessing TDE's Services.
- If The Developmental Edge, is acquired or merged with another company we will transfer aggregate information to the acquiring company.
- We may share aggregate information if necessary to comply with a subpoena or court order, to establish or exercise our legal rights or defend against legal claims, or to cooperate with government and/or law enforcement officials.
- For any lawful basis.

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.

## Security

We take security very seriously. Ensuring that the information collected by our website and web application is secure and protected is very important to us. Consistent with industry standards and applicable law, The Developmental Edge has established appropriate technical and organizational measures to help prevent unauthorized access to, disclosure, alteration or misuse of information collected by our Website, our Application or our Services (“Collected Data”).

We use Amazon Web Services to store all Collected Data. Amazon employs a robust physical and network architecture security program with multiple certifications. For more information on Amazon’s security processes, please visit <https://aws.amazon.com/security/>.

## Encryption

All data transmitted between visitors to our Website, and users of our Application and our Services is encrypted in transit.

All data received and stored by The Developmental Edge servers is encrypted at rest.

## Physical Security

The Developmental Edge’s technical infrastructure is hosted on Amazon Web Services using EC2 security best practices and accredited data centers along with Amazon Web Services VPC Security Groups. Physical security controls at AWS data centers include 24x7 monitoring, cameras, visitor logs, and entry requirements.

## Access Control

All services related to operations and infrastructure are accessible only through secure connectivity (e.g., SSL, SSH). Our back-office, service, and infrastructure password policies require minimum lengths, complexity, expiration, lockout, and disallows reuse. The Developmental Edge grants access to staff and contractors on the basis of least privilege rules, reviews permissions monthly, and revokes access immediately after employee termination.

## Personnel

All employees, coaches, and contractors of The Developmental Edge are required to be bound by confidentiality and non-disclosure obligations, either through a standalone NDA or through confidentiality provisions in their employment, independent contractor, or services agreement. Employees are also required to complete applicable security training.

## Vulnerability Management

All systems and applications undergo security review for vulnerabilities prior to production deployment.

## Incident Management

The Developmental Edge maintains industry standard security incident response policies and procedures.

## Data Retention

If you opt into our mailing list through the Web site or Service, we will retain your contact information until such time as you opt out or unsubscribe.

If you provide information to us to request a demo or ask a question, we provide an option for you to join or decline to join our mailing list. If you decline to join our mailing list, you will not be included in marketing, promotional, or newsletter emails.

If we receive your contact information as part of providing Services to you on behalf of your employer, we will remove your contact information from our system at your employer's request and/or if you opt out of access to our Services.

## Children's Privacy

Our Website, our Application and our Services were not developed or intended for individuals that are deemed to be children under applicable data protection or privacy laws, nor do we knowingly collect information from children.

## "Do Not Track"

Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers. DNT is a way for users to inform websites and services that they do not want certain information about their webpage visits collected over time and across websites or online services. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.

## Your Rights

- You can opt-out of receiving certain marketing or promotional communications from The Developmental Edge at any time by using the unsubscribe link in the email communications we send.
- If you would like to request access, review, update, rectify, or delete any personal information we have about you, you can contact us [here](#). Our privacy team will respond as soon as possible. Rights available under the GDPR are described in our [GDPR Statement](#).
- California residents have the right to ask us for a notice identifying the categories of personal information we share with third parties for marketing purposes. California residents can exercise this right by submitting a written request [here](#).

## California Privacy Rights under the CCPA

The California Consumer Privacy Act of 2018 ("CCPA") takes effect January 1, 2020 and provides California consumers with certain rights regarding their personal information.

The section "What Information We Collect and How We Collect It" explains the specific details of personal information The Developmental Edge collects. The CCPA also requires listing categories of personal information collected. As defined by the CCPA, we collect, or have collected in the past 12 months, the following categories of personal information:

- Identifiers (such as name, email address, postal address, phone number, IP address)
- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) (such as name, contact information, employment)
- Commercial information (such as transaction information, purchase history, payment information)
- Internet or other electronic network activity information (such as browsing history, search history, online behavior)

- Professional or employment-related information (such as job title and your business contact information)
- Inference data about you (such as additional features we think would be of interest to you)

Personal information, as defined by the CCPA, does not include publicly available information from government records and de-identified or aggregated consumer information.

We use and disclose the categories of personal information we collect from and about you consistent with the business purposes discussed in the section “How We Use the Information We Collect”.

The CCPA also sets forth obligations for businesses that “sell” personal information to third parties. We do not “sell” personal information and have not sold any personal information in the past 12 months.

If you are a California resident, you may have the following consumer rights under the CCPA:

1. Right to know about personal information collected, used, disclosed, or sold. You have the right to request that we disclose to you the categories of personal information we collect or disclose (or have collected or disclosed in the past 12 months) about you, the categories of sources of such information, the business or commercial purpose for collecting your personal information, and the categories of third parties with whom we share/discard personal information. This information is also explained throughout this Privacy Policy.
2. Right to request deletion of personal information. You have the right to request the deletion of your personal information we have collected from you, subject to certain conditions and limitations under the law.
3. Right to Opt-Out of the sale of personal information. The CCPA provides consumers with the right to opt-out of the sale of their personal information. We do not share, sell, rent, or trade User Personal Information with third parties for their commercial purposes as defined under the CCPA.
4. Right to non-discrimination for exercising a consumer privacy right. We will not discriminate against you for exercising any of your rights under the CCPA.

To exercise any of your rights as set out above on or after January 1, 2020, please contact us by submitting a request at [info@developmentaledge.com](mailto:info@developmentaledge.com) or by contacting us at Way to Grow INC, LLC d/b/a The Developmental Edge, 2897 North Druid Hill Rd NE #307, Atlanta, GA 30329. You will be required to verify your identity before we are able to fulfill your request. You can designate an authorized agent to make a request on your behalf. To do so, you will need to provide a written

authorization or power of attorney signed by you for the agent to act on your behalf. You will still need to verify your identity with us. Note that consumers may only make a personal information request twice in a 12-month period under the CCPA. We will work to respond to your verifiable request within 45 days of receipt. Certain information may be exempt from requests under applicable law.

## How to Contact Us

If you have any questions about this Privacy Policy or its implementation, you can send an email to [info@developmentaledge.com](mailto:info@developmentaledge.com) or you can send correspondence to the following address:

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

## Changes to this Privacy Policy

We may update this Privacy Policy from time to time based on changes to applicable laws and regulations or other requirements applicable to us, changes in technology, or changes to our business.

Any changes we make to the Privacy Policy in the future will be posted on this page, so you should review it periodically.

If there are significant changes to our information practices, specifically how we process personal information, you will be provided with appropriate online notice. We will also post a notice on our home page if our Privacy Policy has changed.