

Privacy Policy

1. Introduction

1.1 We are committed to safeguarding the privacy of think tank visitors.

With this being said, software platforms and the processes surrounding them are highly complicated. Even in the safest of environments, security flaws sometimes arise. Therefore, it is prudent to assume that any information shared on a software platform may fall into the wrong hands one day and to share information accordingly. Please refrain from sharing sensitive information, such as company or private secrets.

1.2 This policy applies where we are acting as a data controller with respect to the personal data of such persons; in other words, where we determine the purposes and means of the processing of that personal data.

1.3 Our think tank incorporates privacy controls which affect how we will process your personal data. By using the privacy controls, you can specify whether you would like to receive direct marketing communications and limit the sharing of your personal data. You can access the privacy controls through your *Account settings*.

1.4 We use cookies in our think tank. Insofar as those cookies are not strictly necessary for the provision of our think tank and services, we will ask you to consent to our use of cookies when you first visit our think tank.

1.5 In this policy, "we", "us" and "our", and "CEO.buzz", refer to *data controller Joachim Sandström*. For more information about us, see Section 14.

2. Credit



2.1 This document was created using a template from Docular (<https://seqlegal.com/free-legal-documents/privacy-policy>).

3. The personal data that we collect

3.1 In this Section 3 we have set out the general categories of personal data that we process and, in the case of personal data that we did not obtain directly from you, information about the source and specific categories of that data.

3.2 We do not sell any personal data.

3.3 We may process data enabling us to get in touch with you ("**contact data**"). The contact data may include your name, email address and social media account identifiers, and registration IP address. The source of the contact data is you. If you log into our think tank using a social media account, we will obtain elements of the contact data from the relevant social media account provider.

3.4 We may process your think tank user account data ("**account data**"). The account data may include your account identifier, name, email address, business name, account creation and modification dates, think tank settings, likes given/gained, moderator flags requested, moderator warnings, user notes, incoming and outgoing links, reading times per post, user profiles viewed, and marketing preferences. The primary source of the account data is you. If you log into our think tank using a social media account, we will obtain elements of the account data from the relevant social media account provider.

3.5 We may process information relating to transactions, including purchases of goods and/or services, that you enter into with us and/or through our think tank ("**transaction data**"). The transaction data may include your name, your contact details, your payment card details (or other payment details) and the transaction details. The source of the transaction data is you and/or our payment services provider.

3.6 We may process information contained in or relating to any communication that you send to us or that we send to you ("**communication data**"). The communication data may include the communication content and metadata associated with the communication. Our think tank will generate the metadata associated with communications made using the think tank contact forms.



- 3.7 We may process data about your use of our think tank and services (“**usage data**”). The usage data may include your latest IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and think tank navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system.
- 3.8 Not applicable.
- 3.9 Information being posted anonymously. We do not offer any anonymous think tank registration or membership. We do offer anonymous posting, decided by the posting member on a post-to-post basis. Posts created using anonymous posting do not display the name of the posting member. However, there is no guarantee that technical errors or human mistakes may not display anonymous posts. Also, people with intent and knowledge (sometimes called ‘hackers’) may be able to uncover the identity of members posting anonymously. Sensitive information should always be treated with the utmost caution by members and should not be posted at all.

4. Purposes of processing and legal bases

- 4.1 In this Section 4, we have set out the purposes for which we may process personal data and the legal bases of the processing.
- 4.2 **Operations** - We may process your personal data for the purposes of operating our think tank, the processing and fulfilment of orders, providing our services, supplying our goods, generating invoices, bills and other payment-related documentation, and credit control. The legal basis for this processing is our legitimate interests, namely the proper administration of our think tank, services, and business.
- 4.3 **Publications** - We may process account data for the purposes of publishing such data in our think tank and elsewhere through our services in accordance with your express instructions. The legal basis for this processing is our legitimate interests, namely the publication of content in the ordinary course of our operations.
- 4.4 **Relationships and communications** - We may process contact data, account data, transaction data and/or communication data for the purposes of managing our relationships, communicating with you (excluding communicating for the purposes of direct marketing) by



email, SMS, post and/or telephone, providing support services and complaint handling. The legal basis for this processing is our legitimate interests, namely communications with our think tank visitors, service users, individual customers and customer personnel, the maintenance of relationships, and the proper administration of our think tank, services, and business.

- 4.5 **Direct marketing** - We may process contact data, account data and/or transaction data for the purposes of creating, targeting and sending direct marketing communications by email, SMS, and/or post and making contact by telephone for marketing-related purposes. The legal basis for this processing is our legitimate interests, namely promoting our business and communicating marketing messages and offers to our think tank visitors and service users.
- 4.6 **Research and analysis** - We may process usage data and/or transaction data for the purposes of researching and analysing the use of our think tank and services, as well as researching and analysing other interactions with our business. The legal basis for this processing is our legitimate interests, namely monitoring, supporting, improving, and securing our think tank, services, and business generally.
- 4.7 **Record keeping** - We may process your personal data for the purposes of creating and maintaining our databases, back-up copies of our databases and our business records generally. The legal basis for this processing is our legitimate interests, namely ensuring that we have access to all the information we need to properly and efficiently run our business in accordance with this policy.
- 4.8 **Security** - We may process your personal data for the purposes of security and the prevention of fraud and other criminal activity. The legal basis of this processing is our legitimate interests, namely the protection of our think tank, services and business, and the protection of others.
- 4.9 **Insurance and risk management** - We may process your personal data where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks and/or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 4.10 **Legal claims** - We may process your personal data where necessary for the establishment, exercise or defence of legal claims, whether in



court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

- 4.11 **Legal compliance and vital interests** - We may also process your personal data where such processing is necessary for compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another natural person.

5. Providing your personal data to others

- 5.1 Not applicable.
- 5.2 Your personal data held in our think tank databases will be stored on the *EU-based servers* of our hosting services providers, who will be performing according to their judgement necessary hosting, maintenance and/or support activities:

Hubspot, Inc.

2 Canal Park
Cambridge, MA 02141
United States

Communitiq B.V.

Aalbespad 4
2995 TA Heerjansdam
Netherlands

- 5.3 Information access rights for members.
Host and Co-Host. Has full member, moderator, and administrator access, including access to all member information, including email addresses and member identities behind anonymous posts.

Moderator and Senior Mentor. Moderators have access rights to all members' posts, posting meta-information, and members' information. However, moderators do not have access to members' email addresses or their identities behind anonymous posts. Moderator status also grants the right to manage member posts, including moving, removing, hiding, splitting, and modifying them.

Member, Ambassador and Senior Advisor. As a member, you can access the information you have posted, your user settings, other



members' posts, messages, and chats directed to you, as well as various functions allowing you to view think tank information in different processed ways, such as posting top lists, etc.

Guest. These may view the login screen but have no other access to the think tank (thinktank.ceo.buzz). They may browse the completely open homepage (ceo.buzz). Guests do not have access to member information unless posts are reposted, linked, or copied from the think tank by members to be publicly published on other established social media platforms or used for communication and marketing of the think tank.

- 5.4 Financial transactions relating to our think tank and services may be handled by our payment services providers. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments, and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices at *the* payment services providers' websites.
- 5.5 In addition to the specific disclosures of personal data set out in this Section 5, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

6. International transfers of your personal data

- 6.1 Not applicable.
- 6.2 Not applicable.
- 6.3 Not applicable.
- 6.4 Not applicable.
- 6.5 You acknowledge that personal data that you submit for publication through our think tank or services may be available, via the Internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.



6.6 A function on the **platform** is that members are allowed to retweet (send externally) any member's posts to other platforms like LinkedIn and Twitter.

7. Retaining and deleting personal data

- 7.1 This Section 7 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 7.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 7.3 CEO.buzz is an online community that fosters the cultivation of knowledge trees. These trees are cultivated by groups of users, large or small, who collaborate by adding their contributions (in this context referred to as 'posts'), thus forming structures akin to branches of a tree. The resulting trees represent your and our collective product of knowledge.

Deletion of several individual contributions within these trees risks compromising the integrity of the collaborative effort. Deleted answers leave questions without responses or broken and confusing branches of responses; deleted questions leave answers without context.

Secondly, our members are CEOs and other C-level executives. This is a group of people whom marketers and sellers are eager to contact. These contacts are prohibited in our think tank. We need to safeguard members and the think tank from being heavily affected by energetic marketers and sellers. CEO.buzz needs to keep track of and retain the data of members breaching our Terms of Service, sometimes being asked to leave the think tank. This is to reduce the risk of these people returning repeatedly.

As part of our commitment to protecting the privacy of our think tank visitors, we respect *the right to be forgotten*. Therefore, upon your request, we will anonymise your contributions by removing your personal data.

When filing such a request, you must be able to verify that the CEO.buzz think tank account you wish to anonymise belongs to you.



This can be done by sending a request stating, 'I want to anonymise the data associated with the account identified by the sending email address of this email.' This email proves your access to the account in question and documents your anonymisation request. Contact information is found in Section 14.

Please be aware that by anonymising, all the contributions you have created will be anonymised. We will not be able to restore these connections to your account in the event that you regret cancelling your membership. Unfortunately, you will need to start anew.

We will retain your personal data as follows:

- (a) *contact data* will be retained for a maximum amount of time until anonymisation has been executed upon your request
- (b) *account data* will be retained for a maximum amount of time until anonymisation has been executed upon your request
- (c) *transaction data* will be retained for a maximum amount of time until anonymisation has been executed upon your request
- (d) *communication data* will be retained for a maximum amount of time until anonymisation has been executed upon your request
- (e) *usage data* will be retained for a maximum amount of time until anonymisation has been executed upon your request.

7.4 Notwithstanding the other provisions of this Section 7, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

8. Your rights

8.1 In this Section 8, we have listed the rights that you have under data protection law.

8.2 Your principal rights under data protection law are:

- (a) **the right to access** - you can ask for copies of your personal data;



- (b) **the right to rectification** - you can ask us to rectify inaccurate personal data and to complete incomplete personal data;
- (c) **the right to erasure** - you can ask us to erase your personal data, that is, anonymise your contributions as described in Section 7.4;
- (d) **the right to restrict processing** - you can ask us to restrict the processing of your personal data;
- (e) **the right to object to processing** - you can object to the processing of your personal data;
- (f) **the right to data portability** - you can ask that we transfer your personal data to another organisation or to you;
- (g) **the right to complain to a supervisory authority** - you can complain about our processing of your personal data; and
- (h) **the right to withdraw consent** - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.

8.3 These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting the European Data Protection Board.

8.4 You may exercise any of your rights in relation to your personal data by written notice to us, using the contact details set out below.

9. About cookies

9.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

9.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.



9.3 Cookies may not contain any information that personally identifies a user, but personal data that we store about you may be linked to the information stored in and obtained from cookies.

10. Cookies that we use

10.1 We use cookies for the following purposes:

- (a) **authentication and status** - we use cookies to identify you when you visit our think tank and as you navigate our think tank, and to help us determine if you are logged into our think tank;
- (b) **shopping cart** - we use cookies to keep track of what you have put there;
- (c) **personalisation** - we use cookies to store information about your preferences and to personalise our think tank for you;
- (d) **security** - we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our think tank and services generally;
- (e) **advertising** - we do not use advertising cookies;
- (f) **analysis** - we use cookies to help us to analyse the general, but not your personal, use patterns and performance of our think tank and services to improve it;
- (g) **cookie consent** - we use cookies to store your preferences in relation to the use of cookies more generally;

11.2 These cookies (link below) are used by our *first hosting supplier*, Hubspot: (URL: *ceo.buzz*; *mainly pre-membership*):
<https://knowledge.hubspot.com/privacy-and-consent/hubspot-cookie-security-and-privacy>

11.3 Our second hosting partner, Communitiq, does not place any cookies on your hardware (just on ours in our supplier-customer processes):
<https://www.communitiq.com/privacy-policy/>

11.4 These cookies (link below) are used by our *think tank part* based on Discourse (URL: *thinktank.ceo.buzz*; *mainly when-being-member*). See its Section: "By default, all Discourse forums use these cookies":
<https://www.discourse.org/privacy>



11. Cookies usage and data management by our service providers

- 11.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our think tank.
- 11.2 We use Google Analytics. Google Analytics gathers information about the use of our think tank by means of cookies. The information gathered is used to create reports about the use of our think tank. You can find out more about Google's use of information by visiting <https://policies.google.com/privacy>
- 11.3 We use Hubspot to facilitate our marketing and customer service communication with you, like support chats and information and support emails. This service uses cookies. You can view Hubspot's privacy policy by visiting <https://legal.hubspot.com/product-privacy-policy>
- 11.4 We use Hoptar to visually summarise how users move around on the think tank. It helps us understand how users, in general, not you individually, interact with the think tank's content and layout and how to improve the site. You can view Hoptar's privacy policy by visiting <https://www.hotjar.com/privacy/>
- 11.5 We use Mailchimp to send you information via email based on your characteristics. You can view Mailchimp's privacy policy by visiting <https://www.intuit.com/privacy/statement>
- 11.6 We use Zoom for video meetings. You can view Zoom's privacy policy by visiting <https://explore.zoom.us/en/privacy/>
- 11.7 We use LinkedIn to communicate with you, and you may log in to the think tank using their service. You can view LinkedIn's privacy policy by visiting <https://www.linkedin.com/legal/privacy-policy>
- 11.8 We use Twitter to communicate with you, and you may log in to the think tank using their service. You can view Twitter's privacy policy by visiting <https://twitter.com/en/privacy>
- 11.9 We use Facebook to communicate with you, and you may log in to the think tank using their service. You can view Facebook's privacy policy by visiting <https://www.facebook.com/privacy/policy/>
- 11.10 We use SurveyMonkey or Google Forms to ask you about your think tank experiences and opinions. You can view SurveyMonkey and



Google privacy policies by visiting <https://www.surveymonkey.com/mp/legal/privacy/> and <https://policies.google.com/privacy>

12. Managing cookies

- 12.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser and from version to version. You can, however, obtain up-to-date information about blocking and deleting cookies by visiting your browser supplier's web page.
- 12.2 Blocking all cookies will have a negative impact on the usability of this think tank
- 12.3 If you block cookies, you will not be able to use all the features on our think tank.

13. Amendments

- 13.1 We may update this policy from time to time by publishing a new version on our think tank.
- 13.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 13.3 We will notify you of significant changes to this policy when you log in to the think tank.

14. Our details

- 14.1 This think tank is owned and operated by *Able Management Advisors Europe, represented by Joachim Sandström.*
- 14.2 We are registered under registration number SE19640728-3958, and our registered office is at:
*Vanadisplan 8
113 31 Stockholm
Sweden*
- 14.3 Our principal place of business is given above.
- 14.4 You can contact us:
- (a) by post to the postal address given above;



(b) using the CEO.buzz think tank contact form

15. Representatives

15.1 Our representative with respect to our obligations under data protection law, is *Joachim Sandström*, and you can contact our representative by using the contact details above.

15.2 Not applicable.

16. Data protection officer

16.1 Our data protection officer is *Joachim Sandström*, and you can contact our representative by using the contact details above.

17. Changes

CEO.buzz last updated these terms on **2024-02-25**

CEO.buzz and may update this policy. CEO.buzz will post all updates to the think tank. CEO.buzz agrees to message you in the think tank for updates that contain substantial changes if you have created an account.

Once you get notice of an update to these terms, you must agree to the new terms in order to keep using the think tank.

