

Privacy Policy

The Vanguard Group for Leadership LLC (‘Vanguard’) provides premium leadership insight, analysis, learning and networking to a growing audience of global decision makers. Central to our mission is our commitment to upholding the highest standards of data protection for our customers.

This Privacy Policy applies to all websites and web applications which link to this policy and are published by The Vanguard Group for Leadership LLC (“Sites”).

If you wish to amend any of the personal information that we hold about you, or update your marketing preferences, you can do so at any time by letting us know at contact@vanguardgroup.nyc

If you have any queries about how we use your personal information, please contact us at contact@vanguardgroup.nyc

Information we collect

This section details the information we may collect about you. We explain why, and how, we use it in later sections.

Account information

If you decide to create an account or enquire about one of our products or services, we’ll ask you to provide us with some specific information, for example:

- **Basic personal details** – such as name, title and date of birth;
- **Personal contact details** – home phone number, mobile phone number, and email address;
- **Work details** – such as job title, department, company name, company address, work email address and office phone number;
- **Log in details** – such as username and password;

- **Payment details** – such as your bank account and payment card information (only if you register for one of our paid events).

Additional information

On occasion, we will ask you to voluntarily provide additional information, for example:

- Your opinion of our products and services;
- Your preferences, including participation in the Vanguard Network;
- Your career details and resume;
- Information such as your dietary preferences and accessibility requirements when attending a Vanguard event, which may be considered special categories of personal data.

Information we obtain from partners and public sources

In some circumstances, we collect information about you from our partners or from publicly available websites to help us better understand our audience and enhance the relevance of our content. For example, in some cases we obtain the contact details of potential speakers Vanguard events from public websites.

Information we obtain through cookies and similar tools

We use cookies (and similar technologies) and analytics tools across our Sites to collect information about you. This information can be used to improve the performance of the site, make advertising more relevant and enhance your user experience. Examples include:

- **Your location** – we may use cookies to display the version of the site that is most relevant to your location.
- **Your usage** – we use cookies to understand how our customers use our Sites and interact with our communications and journalism. For example, we use technology on our Sites, which records user movements, including page scrolling, clicks and text entered. (It does not record payment details.) This helps us to identify usability issues and improve the assistance we can provide to users and is also used for aggregated and statistical reporting purposes.

- **Your device** – we use cookies to understand what type of device you are using to show you the best version of the site.

How We Process Personal Information

We only process personal information where we have a lawful basis for doing so, such as the following:

- **User consent** – This is where you have given us explicit permission to process personal information for a given purpose. For example, if you complete one of our general enquiry forms, we would ask for your consent if we wanted to use your personal information for any other purpose. You have the right to withdraw this consent at any time. You can manage your preferences within your account or by contacting us.
- **Legitimate business purposes** – This is where we have a legitimate interest, as a business, to process personal information. For example, where we are aware of copyright infringements on our Site, it is in our legitimate interests as a business to identify those responsible. We take due care to balance our interests against your right to privacy.
- **Contractual necessity** – This is where we process personal information to meet our contractual obligations.
- **Legal obligation** – This is where we process personal information in order to comply with the law. For example, we process and retain customer invoice information to comply with financial regulations.

How we use your personal information

We collect personal information for eight main reasons:

1. **To provide our service** – We require some of your basic personal information so our services work as you would expect, for example, delivering providing access to our programs and digital content, notifying you of changes to our services and dealing with customer services queries. We record customer calls for monitoring and training purposes.

2. **To improve and maintain performance** – In order to provide you with the best possible user experience and value, we need to make sure that our products and services work as they should. Using personal information helps us understand how Vanguard users and members utilize our programs, so we can make improvements. This includes contacting members with market research surveys or for telephone interviews, hosting subscriber focus groups and analyzing onsite data to test new and existing events, products and developments for Vanguard.
3. **To bill our customers** – We, along with our authorized payments processors, securely process your payment information to take payments, give refunds and to detect and prevent fraudulent activity. We will also update your payment information in the event that a payment is unsuccessful. You can manage your payment information at any time by contacting us.
4. **To monitor compliance with our policies and terms** – We monitor for breaches of our terms and conditions and copyright policies. For example, we reserve the right to inform you if, through participation in Vanguard, you are using our content in breach of the terms and conditions or copyright policies of our Sites. We also monitor activity on our Sites to detect and prevent invalid or fraudulent traffic.
5. **To personalize our products and services** – We improve your experience of our products and services by personalizing parts of our Sites and apps with the information you give us and what we learn about you. This includes showing you material you may be interested in and recommending emails you may wish to sign up to. Where our Sites have such functionality, you can manage elements of personalization in your account.
6. **To communicate product changes and offers** – We want you to get the most out of Vanguard, including showcasing our latest content and programs.

We may contact you with carefully-curated offers and promotions, exclusive event invitations and feature announcements

7. **For the purpose of underwriting**– We rely on underwriting in part to support our unique leadership programming. We use the information you give us and the information we collect about you to foster the most impactful and relevant underwriting.

Who we share your personal information with

We disclose personal information to facilitate the running of our business or to provide specific services you have requested. Commonly, we will disclose information to:

- **Service providers** – We engage service providers who help to support our business and improve our products. These service providers include, for example, fulfilment providers for delivery of our digital content and marketing; customer service agencies; hosts, organizers and sponsors of our events; organizations that host our Sites or databases; and providers of online surveys. We have contracts in place with these data processors and they can only use your personal information under our instruction.
- **Institutional customers** – If your subscription is provided under a group subscription or trial, we will provide our client with information about your activity on our Site(s) for the purposes of billing. This information is provided at a high level and our client cannot track your exact activity with Vanguard. We may also provide current or prospective clients with activity information about individual subscribers who registered using that entity’s email address. We will always contact individual subscribers before doing so, and will respect any requests not to share this information.
- **Social media providers** – Information will be shared with social media platforms where you log in to our Sites via a social media account, or use components on our Sites provided by social media platforms
- **Other users** – Some of our Sites are publicly accessible and anyone around the world who accesses our Sites may be able to see anything you post, such as comments about an article. We encourage you to use a

pseudonym when commenting on our Sites if you do not wish to be identifiable to other readers.

- **Legal processes and successors in title** – We may also disclose your information to comply with applicable laws, court orders or other valid legal processes, and to enforce or apply our terms of use, any subscription agreement, or any of our other rights. We may transfer or disclose your personal information to any entity which takes over or acquires the relevant Vanguard business. We also share aggregated, non-identifiable information with third parties. Before sharing this information, we ensure that it cannot identify you as an individual. For example, we may release information about the size and growth of our audiences.

How long we retain your personal information

We retain your personal information for as long as your account is active and therefore open; this allows you to continue accessing our content, products and services.

If you become inactive and are not a member of the Vanguard Network, we may delete elements of the information associated with your account. We will normally let you know if your access is going to be withdrawn and give you the opportunity to retain your account.

Where we don't need to keep your information in full, we will obfuscate or aggregate it, for example, web activity logs and survey responses. This is to ensure that we do not retain your information for any longer than is necessary.

It is sometimes necessary for us to keep your personal information for longer periods of time, for example:

- If there is a statutory requirement to retain it;
- If we require the information for legal reasons or there is a legitimate business need for us to retain it;
- To ensure we do not contact you if you have asked us not to.

Your rights

Under data protection laws, you have rights as an individual in relation to the personal data we hold about you. These rights include:

- The right to object to direct marketing – your preferences, including in relation to direct marketing, can be found in your account;
- The right to access the personal data that we process about you;
- The right to request the deletion of your personal data;
- The right to request the rectification of your personal data – you can manage some of this information in your account.

You can exercise these rights by contacting us at contact@vanguardgroup.nyc

Where this Privacy Policy applies

Our Sites are not intended for children under 16 years of age. We do not intentionally collect or use any information from children.

Our Sites contain links to third party websites which are not subject to this privacy policy. We are not responsible for their content, use of personal information, or security practices.

If you have a query in regards to the processing of your personal information, please contact us at contact@vanguardgroup.nyc

Changes to this Privacy Policy

This policy is effective from February 1, 2019.

Any changes we may make to this privacy policy will be posted on this page. If changes are significant, we may choose to notify you by email or to clearly indicate on our home page that the policy has been updated.