Privacy Policy

Introduction

1. Preamble

The protection of your data is very important to us. This Privacy Policy informs you about the type, scope, and purpose of processing of personal data within our website and connected services (collectively, the "Website"). This Privacy Policy also informs you about the rights to which you are entitled regarding your personal data, digital products, events, communications, and client relationships, whether provided via the Website or through third-party platforms.

2. Data Controller and Contact

The controller within the meaning of the General Data Protection Regulation (GDPR) and other applicable data protection laws is:

Corporate Warriors, LLC
4410 Pearson Cir
Clearwater, Florida 33761, USA
Email: info@corporatewarriors.us

For any questions regarding data protection or the exercise of your rights, you may contact us using the contact details above.

3. Definitions

This Privacy Policy is based on the terms used in the GDPR. Definitions (e.g., "personal data" and "processing") can be found in article 4 of the General Data Protection Regulation (GDPR).

4. General information on data processing

4.1. Scope of processing of personal data

We process personal data to the extent necessary to provide a functional Website, deliver our services and digital products, communicate with you, and operate our business. Depending on the context, processing may be based on your consent, a contract's legal obligation, or our legitimate interest.

4.2. Legal basis for the processing of personal data

Insofar as we obtain the consent of the data subject for the processing of personal data, art. 6 para. 1 lit. a EU Data Protection Regulation (GDPR) serves as the legal basis.

In the processing of personal data required for the performance of a contract to which the data subject is a party, Article 6 lit. b GDPR serves as the legal basis. This also applies to processing operations that are necessary to carry out pre-contractual measures.

Insofar as the processing of personal data is required to fulfill a legal obligation to which our company is subject, Art. 6 lit. c GDPR serves as the legal basis. This applies to the extent that the under otherwise of the data subject's and other employees' rights require the processing of personal data. Article 6 lit.f GDPR serves as the legal basis for processing.

If processing is necessary to safeguard a legitimate interest of our company or a third party and if the interests, fundamental rights and freedoms of the data subject do not outweigh the first-mentioned interest, Art. 6 para. 1 lit. f GDPR serves as the legal basis for processing.

4.3. Data erasure and storage time

We store personal data only as long as necessary for the purposes described in this Privacy Policy or as required by law. Data subject to statutory retention may be posted no longer applicable, unless identifiers is required for legal or contractual purposes.

For clarity, certain categories of data may be retained as follows:

- Contact inquiries/messages: typically retained for up to two (2) weeks for quality and follow-up purposes.
- Coaching notes and summaries: retained for a reasonable period for service delivery, documentation, and quality control.
- Transaction and invoice data: retained in accordance with applicable tax and financial regulations.
- Marketing data: retained until withdrawal of consent or unsubscribe, subject to longer obligations.

Cookies and other technologies

5. Provision of the Website and Server Log Files

When you access our Website, technical data is automatically processed by our hosting provider, **WP Engine**, to ensure the secure and stable operation of the Website.

The following data may be processed in server log files:

- IP address
- Date and time of access
- Requested page or file
- Browser type and operating system
- Referrer URL (if applicable)

This processing is carried out for:

- Website security and stability
- Collecting and preventing misuse or attacks
- Technical error analysis

Legal basis: Art. 6(1)(f) GDPR (legitimate interest).

Server log data is stored by our hosting provider for a limited period in accordance with their retention practices and is not combined with other personal data by us.

We do not use server log files to identify individual visitors.

6. Cookies

Our Website uses cookies that are necessary for the technical operation of the Website (e.g., session cookies, security cookies). Currently, we do not use cookies for marketing or analytics and do not place consent-required cookies on our cookie banner.

You may accept or reject non-essential cookies at any time through the cookie settings on our Website.

Further information can be found in our Cookie Policy.

You can change your cookie preference at any time through the cookie settings on our Website.

7. Analytics and Tracking

We use analytics and tracking technologies, including Google Analytics, to understand how visitors interact with our Website, improve user experience, analyze Website performance, and optimize our marketing and content.

Google Analytics may process information such as:

- IP address
- browser and device information
- pages visited
- time spent on pages
- interactions with the Website
- referral sources

This information may be collected through cookies and similar technologies.

Where required by applicable law, analytics and non-essential cookies are activated only after your consent through our cookie banner.

Legal basis:

- Art. 6(1)(a) GDPR (consent)
- Art. 6(1)(f) GDPR (legitimate interest), where permitted by applicable law

You may withdraw or adjust your cookie preferences at any time through the cookie settings on our Website.

Google may process data in the United States or other countries in accordance with its own privacy policy:
https://policies.google.com/privacy

You can also opt out of Google Analytics through:
https://tools.google.com/dlpage/gaoptout

Communication and Marketing

8. Newsletter, Email Communication, and Marketing

We offer newsletters, automated emails, and informational messages related to our services, products, and free resources.

When you subscribe, download a free resource, register for an offer, or otherwise provide your email address, we process your data based on **your consent** (pursuant to **Art. 6(1)(a) GDPR**).

We use the following service to provide our email communication and marketing:

- **Brevo** (formerly Sendinblue)
  - **Art.** Brevo Sendinblue

In the course of email communication, our email service provides may process additional technical and usage data, such as IP address, device and browser information, timestamps, delivery status, opens, clicks, and unsubscribe actions. This data is used to ensure technical delivery and security, and to improve the relevance and effectiveness of our communications.

These providers process personal data on our behalf under applicable data protection agreements.

Emails may contain educational content, updates, and information about our offerings. You may unsubscribe at any time from the list included in each email.

Email performance tracking: We may process technical information such as open and click events to improve deliverability and relevance. **Legal basis:** Art. 6(1)(a) GDPR (consent), and where permitted by applicable law, Art. 6(1)(f) GDPR (legitimate interest, in particular to improve our service and support).

By submitting your information through our forms, you consent to receive the requested resources and, where applicable, to receive related educational or promotional emails. We process this information to deliver the requested resource and to improve our services.

Retention: We store contact details and logs for as long as needed to handle the request and for documentation purposes, unless a longer retention is required by law.

Forms and Questionnaires (Typeform)

We use Typeform to add questionnaires, intake forms, waitlists, and feedback. Submission of certain forms is required to enter our programs or services.

Depending on the context, forms may collect contact details, business data, and voluntarily share personal reflections, professional challenges, or experiences related to stress, burnout, or leadership.

Such information is processed solely for the purposes of evaluating applications, delivering coaching services, and improving our offerings. We do not request sensitive information.

Processing is based on Art. 6(1)(b) GDPR (pre-contractual measures and contract performance) and Art. 6(1)(a) GDPR (consent). Where special category data is voluntarily shared, processing is based on explicit consent pursuant to Art. 9(2)(a) GDPR.

Typeform collects DATA(IP), We may use DATA(IP) solely for security, fraud prevention, and system integrity purposes. We do not use Typeform for tracking, advertising, or behavioral analytics.

Retention: Transaction and invoice records may be stored for the period required by applicable tax and accounting laws.

10. Video Conferencing, Webinars, Coaching Notes, and Recordings

We use video conferencing and recording tools such as Zoom, Google Meet, and Microsoft Teams for consultations, group coaching, webinars, and podcast or masterclass recordings.

Depending on the session, personal data may include name, image, voice, chat messages, shared content, screenshots, and session activities.

Group coaching sessions are generally recorded and may be made available to participants for a limited period of time (typically 30 days) for educational and review purposes.

One-on-one coaching sessions may be kept longer, from time, to time, for purposes of supporting the client's progress, creating summaries, and providing follow-up support, unless a shorter retention period is requested and is reasonably feasible.

In addition, written notes may be taken during coaching sessions and used to support service delivery, client continuity, and follow-up materials.

Recordings are stored within the respective platform's cloud environment and retained for as long as necessary for the intended purpose, in accordance with our operational needs and the retention settings of the respective platform.

Zoom links and related recordings may also be distributed via email and stored via Discord, depending on the program.

Processing is based on Art. 6(1)(b) GDPR (contract performance), Art. 6(1)(a) GDPR (consent), and Art. 6(1)(f) GDPR (legitimate interest), as applicable.

11. Use of AI Tools

We may use AI-based tools (such as ChatGPT) to assist with drafting content, summarizing notes, organizing information, or improving internal workflows. Personal data is not intentionally submitted to identifiable form to such tools.

We do not use AI systems for automated decision-making that produces legal or similarly significant effects within the meaning of Art. 22 GDPR.

12. Embedded Content and Third-Party Platforms

Our Website may embed content from third-parties, such as **YouTube, Spotify,** and **Apple Podcasts**. When you view embedded content, these providers may process personal data (such as IP address and usage data) under their own privacy policies.

Where required, embedded content may be loaded only after your consent via the cookie banner.

Legal basis: Art. 6(1)(f) GDPR (legitimate interest in providing content) and/or **Art. 6(1)(a) GDPR** (consent where required).

13. Paids and Third-Party Resources (Google Forms)

Our Website may use forms provided via Google Forms, a service of Google LLC. When pages are accessed, requests may be sent to Google servers, which may include the user's IP address.

The use of forms serves the purpose of enabling a convenient and reliable application process for our services and is based on **Art. 6(1)(f) GDPR (legitimate interest)**.

Where required, we will request your consent before loading third-party resources.

Further information can be found in Google's privacy policy:
https://policies.google.com/privacy

14. Coaching, Assessments, and Sensitive Information

As part of our coaching services, clients may voluntarily share personal information, including sensitive details (for example, relating to stress, burnout, or personal development). We process such information solely for the purpose of providing coaching services and maintaining client records.

We do not provide medical, psychological, or therapeutic diagnoses.

Legal basis:

- **Art. 6(1)(b) GDPR** for delivering contracted coaching services
- Where special category data is voluntarily shared and processed, **explicit consent** may apply under **Art. 9(2)(a) GDPR**, where applicable.

In the course of providing coaching services, our service providers may also process, including contact details, application or intake responses, scheduling information, and, where applicable, payment information. We do not intentionally collect or store voluntarily shared during assessments. This may include sensitive personal or professional reflections, or challenges shared in the context of coaching.

We may also collect emergency contact information provided by clients. This information is collected only for the purpose of responding appropriately in the event of a serious concern regarding a client's safety or wellbeing. During the intake process, clients may be asked to provide a trusted emergency contact if we reasonably necessary and is relevant to our services (such as for service delivery, legal compliance, or legitimate business purposes).

We may use, use anonymized or aggregated client experiences for educational, training, or illustrative purposes, without disclosing any identifying information.

15. Community Platform and Group Communications (Discord)

We use Discord as a community and communication platform for certain group programs. Depending on the program, Discord may be used to provide program updates, share links (including Zoom links), post resources, and enable optional community interaction.

Participation in Discord may require you to have a Discord account. In order to access the relevant channels, we may process your Discord handle or other information about whether to you your role/ access in a particular server (Discord. Interactions with other participants is voluntary, and participants are not required to actively engage or share information with others.

When using Discord, personal data may be processed by Discord and/or related to Discord's infrastructure providers in the United States or other countries, such as IP addresses, profile information, messages, reactions, and shared content. We recommend avoiding the sharing of sensitive personal information in community channels.

In addition, Discord may be used internally by our team to coordinate program delivery, manage access, and support communication with participants and service providers. Access is limited to authorized team members and, where applicable, enrolled clients.

Processing is based on Art. 6(1)(b) GDPR (contract performance) and Art. 6(1)(f) GDPR (legitimate interest in efficient communication and service delivery). Where participation is optional, processing may also rely on consent.

Please note that Discord processes personal data under its own privacy policy and acts as an independent controller for its platform operation.

16. Data Transfers to Third Countries

We use tools based in the United States and on servers processed that may process data in the United States and other countries. Where personal data is transferred outside the EU/EEA, we implement appropriate safeguards, such as the **EU Standard Contractual Clauses**, where applicable, or other lawful transfer mechanisms.

17. Rights of Access (Information)

You can ask the person in charge to confirm whether personal data concerning you will be processed by us.

If such processing has taken place, you can request the following information from the person responsible:

- the purposes for which the personal data are processed;
- the categories of personal data processed;
- the recipients or categories of recipients to which the personal data concerning you have been or will be disclosed;
- the planned duration of storage of the personal data concerning you or, if specific information is not possible, criteria for determining the storage period;
- the existence of a right to have your personal data concerning you corrected or deleted, a right to restrict processing by the controller or a right to object to such processing;
- the existence of a right of appeal to a supervisory authority;
- any available information on the origin of the data if the personal data are not collected from the data subject;
- the existence of automated decision-making, including qualification in accordance with Art. 22 para. 1 and 4 GDPR and - at least in these cases - meaningful information about the logic involved and the scope and intended effects of such processing for the data subject.

You have the right to request information as to whether the personal data concerning you is transferred to a third country or to an international organization. In the context, you may request to be informed of the appropriate guarantees pursuant to Art. 46 GDPR in connection with the transfer.

18. Right to Rectification

You have a right of rectification and/or completion with regard to the responsible party if the personal data processed concerning you are incorrect or incomplete. The party responsible shall make the rectification without delay.

19. Right to Restriction of Processing

Under the following conditions, you may request that the processing of personal data concerning you be restricted:

- If you dispute the accuracy of the personal data concerning you for a period of time that enables the person responsible to verify the accuracy of the personal data;
- the processing is unlawful and you refuse to delete the personal data and instead request the restriction of the use of the personal data;
- the controller no longer needs the personal data for the purposes of the processing, but you do need them to assert, exercise or defend legal claims; or
- if you have filed an objection to the processing pursuant to Art. 21 para. 1 GDPR and it has not yet been determined whether the legitimate reasons of the person responsible outweigh your reasons.

If the processing of personal data concerning you has been restricted, such data may not be processed - apart from storage - with your consent or for the purpose of asserting, exercising or defending rights or protecting the rights of another natural or legal person or for reasons of an important public interest of the Union or a Member State.

If the processing restriction has been restricted according to the above conditions, you will be informed by the person responsible before the restriction is lifted.

20. Right to Erasure

You may request the data controller to delete the personal data relating to you without delay and the controller is obliged to delete the data without delay if one of the following reasons applies:

- The personal data concerning you are no longer necessary for the purposes for which they were collected or otherwise processed.
- If you revoke the consent on which the processing was based, and there is no other legal basis for the processing.
- If you have filed an objection to the processing pursuant to Art. 21 para. 1 GDPR and there are no overriding legitimate reasons for the processing, or the person responsible objects to the processing.

If the processing of personal data concerning you has been restricted, such data may not be processed - apart from storage - with your consent or for the purpose of asserting, exercising or defending rights or protecting the rights of another natural or legal person or for reasons of an important public interest of the Union or a Member State.

If the processing restriction has been restricted according to the above conditions, you will be informed by the person responsible before the restriction is lifted.

21. Right to Data Portability

You have the right to receive personal data concerning you, which you have provided to a responsible party, in a structured, conventional and machine-readable format. In the context of the applicable provisions, you may also request that the personal data be transmitted to another person responsible.

22. Right to Revocation of Consent

Under the following conditions, you may request that the processing of personal data concerning you be restricted:

- If you dispute the accuracy of the personal data concerning you for a period of time that enables the person responsible to verify the accuracy of the personal data.
- the processing is unlawful and you refuse to delete the personal data and instead request the restriction of the use of the personal data;
- the controller no longer needs the personal data for the purposes of the processing, but you do need them to assert, exercise or defend legal claims; or
- if you have filed an objection to the processing pursuant to Art. 21 para. 1 GDPR and it has not yet been determined whether the legitimate reasons of the person responsible outweigh your reasons.

If the processing of personal data concerning you has been restricted, such data may not be processed - apart from storage - with your consent or for the purpose of asserting, exercising or defending rights or protecting the rights of another natural or legal person or for reasons of an important public interest of the Union or a Member State.

If the processing restriction has been restricted according to the above conditions, you will be informed by the person responsible before the restriction is lifted.

23. Right to Complaint

You have the right, without prejudice to other administrative or judicial remedies, to complain to a supervisory authority, in particular in the Member State of your place of residence, your place of work or the place of the alleged violation, if you believe that the processing of personal data relating to you violates the GDPR.

24. Changes to this Privacy Policy

We reserve the right to update this Privacy Policy from time to time to reflect changes in our services, digital products, or legal requirements. The current version will be published on our Website.

Last updated: [Date]

- You revoke your consent, on which the processing was based pursuant to Art. 6 para. 1 lit. a or Art. 9 para. 2 lit. a GDPR, and there is no other legal basis for the processing.
- You file an objection against the processing pursuant to Art. 21 para. 1 GDPR and there are no overriding legitimate reasons for the processing, or you file an objection against the processing pursuant to Art. 21 para. 2 GDPR.
- The personal data concerning you have been processed unlawfully.
- The deletion of personal data concerning you is necessary to fulfil a legal obligation under Union law or the law of the Member States to which the data controller is subject.
- The personal data concerning you have been collected in relation to information society services offered pursuant to Art. 8 para. 1 GDPR.

Information to third parties

If the data controller has made the personal data concerning you public and is obliged to delete it pursuant to Art. 17 para. 1 GDPR, he shall take appropriate measures, including technical measures, taking into account the available technology and the implementation costs, to inform data processors who process the personal data that you as the data subject have requested the deletion of all links to this personal data or of copies or replications of this personal data.

Exceptions

The right to cancellation does not exist insofar as the processing is necessary

- to exercise freedom of expression and information;
- for the performance of a legal obligation required for processing under the law of the Union or of the Member States to which the controller is subject or for the performance of a task in the public interest or in the exercise of official authority conferred on the controller;
- for reasons of public interest in the field of public health pursuant to Art. 9 para. 2 lit. h and i and Art. 9 para. 3 GDPR;
- for archiving purposes in the public interest, scientific or historical research purposes or for statistical purposes pursuant to Art. 89 para. 1 GDPR, insofar as the law referred to under a) is likely to render impossible or seriously impair the attainment of the objectives of such processing, or
- to assert, exercise or defend legal claims.

23. Right to Be Informed of Recipients

If you have exercised your right to have the data controller correct, delete or limit the processing, he/she is obliged to inform all recipients to whom the personal data concerning you have been disclosed of this correction or deletion of the data or restriction on processing, unless this proves impossible or involves a disproportionate effort.
The person responsible shall have the right to be informed of such recipients.

24. Right to Data Portability

You have the right to receive the personal data concerning you that you have provided to the person responsible in a structured, common and machine-readable format. In addition, you have the right to pass this data on to another person in charge without obstruction by the person in charge to whom the personal data was provided, provided that

- processing is based on consent pursuant to Art. 6 para. 1 lit. a GDPR or Art. 9 para. 2 lit. a GDPR or on a contract pursuant to Art. 6 para. 1 lit. b GDPR and
- processing is carried out using automated methods.

In exercising this right, you also have the right to request that the personal data concerning you be transferred directly from one data controller to another data controller, insofar as this is technically feasible. The freedoms and rights of other persons must not be affected by this.
The right to transferability shall not apply to the processing of personal data necessary for the performance of a task in the public interest or in the exercise of official authority conferred on the responsible party.

25. Right to Object

You have the right to object at any time, for reasons arising from your particular situation, to the processing of personal data concerning you under Article 6(1)(e) or (f) of the GDPR; this also applies to profiling based on these provisions.
The responsible party no longer processes the personal data concerning you, unless he can prove compelling reasons worthy of protection for the processing, which outweigh your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.
If the personal data concerning you are processed for direct marketing purposes, you have the right to object at any time to the processing of the personal data concerning you for the purpose of such advertising; this also applies to profiling, insofar as it is associated with such direct marketing.
If you object to the processing for direct marketing purposes, the personal data concerning you will no longer be processed for these purposes.
You have the possibility to exercise your right of objection in connection with the use of Information Society services by means of automated procedures using technical specifications, notwithstanding Directive 2002/58/EC.

26. Right to Withdraw Consent

You have the right to revoke your data protection declaration of consent at any time. The revocation of consent shall not affect the legality of the processing carried out on the basis of the consent until revocation.

27. Automated Decision-Making, Including Profiling

You have the right not to be subject to a decision based exclusively on automated processing – including profiling – that has legal effect against you or significantly impairs you in a similar manner. This does not apply if the decision

- is necessary for the conclusion or performance of a contract between you and the person responsible,
- is admissible by law of the Union or of the Member States to which the person responsible is subject and that law contains appropriate measures to safeguard your rights, freedoms and legitimate interests, or
- with your express consent.

However, these decisions may not be based on special categories of personal data pursuant to Art. 9 para. 1 GDPR, unless Art. 9 para. 2 lit. a or g GDPR applies and appropriate measures have been taken to protect your rights and freedoms and your legitimate interests.
In the cases referred to in (1) and (3), the party responsible shall take reasonable measures to safeguard your rights, freedoms and legitimate interests, including at least the right to obtain the intervention of a person by the party responsible, to state his own position and to challenge the decision.

28. Right to Lodge a Complaint

Without prejudice to any other administrative or judicial remedy, you have the right of appeal to a supervisory authority, in particular in the Member State where you reside, work or suspect of infringement, if you believe that the processing of personal data concerning you is contrary to the GDPR.
The supervisory authority to which the complaint has been lodged shall inform the complainant of the status and results of the complaint, including the possibility of a judicial remedy under Article 78 GDPR.

29. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect legal, technical, or business changes. The current version is always available on our Website.

Contact us

To get in touch directly with the team, please send us an email at info@corporatewarriors.io.

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