# 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 the processing of personal data within our website and connected sites (collectively, the "Website"). This Privacy Policy also applies to personal data processed in connection with our presence on external profiles, such as social media accounts, and client relationships, whether processed by 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 Services, LLC
2 Corporate Park
Clearwater, Florida 33762, USA
Email: info@corporateservices.co

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 include, but not limited to, contact, content, legal, transaction, technical data.

#### 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.

Personal data necessary for the performance of a contract with the data subject to which the data subject is a party, Art. 6 (1) 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 personal data is necessary to fulfill a contract or to fulfill a legal obligation to which our company is subject, Art. 6 para. 1 lit. c GDPR serves as the legal basis.

In the event that vital interests of the data subject or another natural person require the processing of personal data, Article 6 (1) GDPR serves as the legal basis.

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 process personal data only as long as necessary for the purposes described in this Privacy Policy or as required by law. Personal data is generally retained once the purpose no longer applies, unless retention is required for legal or contractual reasons.

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

- Group scheduling recordings: typically retained for up to two (2) weeks for participant access.
- Coaching notes and summaries: retained for a reasonable period for service delivery, documentation, and dispute resolution.
- Transaction and invoice data: retained in accordance with applicable tax and legal requirements.
- Marketing contacts and withdrawals of consent: retained in accordance, subject to legal 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
- Detecting 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. Additional cookies (e.g., for embedded third-party content or analytics, if activated) are used only if you have given your consent in 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 manage your cookie preferences 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 content and services.

Google Analytics may process information such as:

- IP address
- browser and device information
- page 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, request a quote, 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 providers for email communication and marketing:

- **Brevo** (Former Sendinblue)
- **Kit** (Former ConvertKit)

In the course of email communication, our email service providers may process additional technical data such as delivery status, bounces, and limited interaction data (e.g., whether emails were opened, clicked, and unsubscribe actions. This data is used to ensure deliverability, system 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 using the link included in each email.

**Email performance tracking:** We may process technical information such as email opens and clicks to improve our communication and measure effectiveness. **Legal basis:** Art. 6(1)(a) GDPR (consent), and where permitted by applicable law, Art. 6(1)(f) GDPR (legitimate interest), in particular for deliverability, security and system integrity.

If you subscribe through our forms, you consent to receive the communications described above. You may withdraw your consent at any time without affecting the lawfulness of our previous and future processing.

**Retention:** Your email address is stored for as long as you remain subscribed. After unsubscribing, your data will be deleted or anonymized unless longer retention obligations apply.

### 9. Messenger-Based Communication (WeChat)

We use automation tools such as MeraChat to manage communication via social media messaging platforms, including WeChat. These tools may process messages, contact details, message content, and interaction metadata provided during conversations or automated workflows.

Processing is based on Art. 6(1)(a) GDPR (consent) and Art. 6(1)(f) GDPR (legitimate interest in responding to inquiries and delivering requested information).

### 10. Right to Object, Withdrawal of Consent, and Deletion

You may withdraw your consent to receive emails at any time by using the unsubscribe link included in each email or by contacting us directly.

After unsubscribing, we will no longer send any marketing emails. Certain data may be retained in a limited form (suppression data) to ensure compliance with your unsubscribe request and to prevent future unwanted emails, and to establish, exercise or defend legal claims.

You may also object to the processing of your personal data for direct marketing purposes at any time. If you do, your personal data will no longer be processed for such purposes.

Requests for deletion of personal data will be handled in accordance with applicable legal requirements. Data that is no longer required will be deleted or kept in legal retention obligations will be blocked.

### 11. Contact Forms, and Scheduling

#### 11.1 Contact Forms and Email Contact

If you contact us via a form or by email, we process the data you provide (e.g., name, email address, message content) to respond and manage the communication.

Legal basis:

- **Art. 6(1)(b) GDPR** (communication relates to a contract or pre-contractual steps)
- **Art. 6(1)(f) GDPR** (for general inquiries (legitimate interest in responding))
- **Art. 6(1)(a) GDPR** (for optional and revocable consent in a specific context)

**Retention:** We store communication data only 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 for applications, intake forms, questionnaires, and feedback. Submission of certain forms is required to enter our programs or services.

Depending on the content, forms may include open-ended questions where users voluntarily share personal reflections, professional challenges, or experiences related to stress, burnout, or workplace situations.

Such information is processed solely for the purpose of evaluating applications, delivering services, and improving our offerings. We do not request medical or therapeutic information.

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

Open protection (CAPTCHA): We may use CAPTCHA services (e.g., Google reCAPTCHA) to protect our forms against bots. This service may process your IP address and other technical data. **Legal basis:** Art. 6(1)(f) GDPR (legitimate interest in security) and/or Art. 6(1)(a) GDPR (consent where required).

#### 11.2 Scheduling (Calendly)

We use scheduling tools such as **Calendly** to arrange appointments. When you book, the data you provide is processed to schedule and manage the appointment. Please also review the providers privacy policy.

#### 11. Customer Relationship Management (CRM) and Automation

We use a customer relationship management (CRM) system (Close) to manage leads, clients, email subscribers, and business communications.

Personal data processed in the CRM may include contact details (such as name, email address, phone number), communication history, notes, applications or inquiries, and interaction data related to related calls or services.

Data is transferred to the CRM from forms, applications, email marketing tools, and booking systems. We use automation tools such as Zapier to securely transfer data between systems. Zapier does not store or permanently process data but facilitates automated data transmission between connected services.

We may also use tools such as Google Workspace (including Google Docs) to create, store, and manage coaching notes, session summaries, and internal client records. These tools are used solely for internal documentation and are not accessible to third parties unless shared by us.

Processing is based on Art. 6(1)(b) GDPR (contract performance), Art. 6(1)(c) GDPR (consent), and Art. 6(1)(f) GDPR (legitimate interest in efficient business operations).

### 12. Use of AI Tools

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

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

### 14. Embedded Content and Third-Party Media

We may use third-party media and content platforms, such as **YouTube**, **Spotify** and **Apple Podcasts**. When you interact with 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).

### 15. Forms and Third-Party Resources (Google Forms)

Our Website may use forms provided by **Google Forms**, a service of Google LLC. When pages are accessed, requests may be sent to Google servers, which may process IP addresses.

The use of forms serves the purpose of enhancing a convenient and visually appealing presentation of our lectures and courses. **Art. 6(1)(f) GDPR (legitimate interest)**.
Where requested, we will request your consent before loading third-party resources.

Further information on Google's data processing is available in Google's privacy policy: https://policies.google.com/privacy

### 16. Coaching, Assessments, and Sensitive Information

As part of our 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 tailoring the client relationship.

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

Legal basis:

- **Art. 6(1)(b) GDPR** for delivering contracted coaching services
- Where sensitive 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, we may process personal data including contact details, session notes, and assessment results. Where sensitive information is voluntarily shared, we process it only to support coaching and do not intentionally collect special categories of data. This may include personal or professional experiences, reflections, or challenges shared in the context of coaching.

We may also collect emergency contact information provided by clients. This information is collected solely for the purpose of responding appropriately in the event of a serious concern regarding a client's safety or wellbeing during the course of our services. Emergency contact information is accessed only when such a situation arises and is not used for any other purpose. Legal basis: Art. 6(1)(f) GDPR (legitimate interest in ensuring safety and duty of care).

We may also use anonymized or de-identified client experiences for educational, training, or illustrative purposes, without disclosing any identifiable information.

### 17. Community Platforms and Group Communication (Telegram, Discord, and Similar Platforms)

We may provide participants in certain coaching programs with access to private online communities through third-party communication platforms, including **Telegram**, **Discord**, or similar platforms, depending on the program.

These community platforms may be used to share program updates, educational resources, Zoom links, announcements, answer coaching-related questions, facilitate optional discussions among participants, and foster a supportive community where participants may encourage one another and share experiences related to the coaching program.

Participation in a community platform may require you to create an account with the applicable platform and to accept its terms of service and privacy policy. We process limited data such as profile photos, messages, and other information you voluntarily share may be visible to other participants and processed by the platform provider in accordance with its own privacy policy.

Participation in community discussions is voluntary. We do not require participants to share messages or share personal information. While many participants choose to exchange encouragement, insights, and resources with one another, we do not monitor all conversations and do not guarantee that content available in the community will be moderated according the discussion of highly sensitive, confidential, legal, medical, financial, or employment-related information within community discussions.

Corporate Services, LLC does not control how third-party community platforms process personal data and is not responsible for their independent data processing practices. Please review the applicable privacy policy for the platform you take part in participating.

Our team may also use these platforms internally to coordinate program delivery, client support, and community moderation. Access to these communications is limited to authorized staff and contractors who require access for program administration.

Community participation is intended to provide peer support and educational exchange. Participants are encouraged to exercise discretion when sharing personal information, and to report any concerns or abuse through the community platform's reporting tools or by contacting us directly.

Processing of personal data is based on Art. 6(1)(b) GDPR (performance of a contract) and Art. 6(1)(f) GDPR (legitimate interest in facilitating communication and delivering coaching services). Where participants voluntarily share sensitive information, they do so at their own discretion.

### 18. Data Transfers to Third Countries

We are based in the United States and use service providers that may process data in the United States and other countries. When 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.

### 19. Right of Access (Information)

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

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 whom the personal data concerning you have been or are still being disclosed;
- the planned period 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 have processing restricted 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 (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 this context, you may request to be informed of the appropriate guarantees pursuant to Art. 46 GDPR in connection with the transmission.

### 20. 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 correction without delay.

### 21. 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 that the use of the personal data be restricted;
- 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 only be processed – apart from being stored – with your consent or for the purpose of asserting, exercising or defending legal claims or protecting the rights of another natural person or group of a legal entity 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 responsible party before the restriction is lifted.

### 22. Right to Erasure

You may request that data controller to delete the personal data concerning you without delay and the controller is obliged to delete this 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.
- 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 object to the processing pursuant to Art. 21 para. 1 GDPR. Art. 21 GDPR and there are no overriding legitimate reasons for the processing, or you object to 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 fulfill 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 the personal data or of copies or replications of the personal data.

#### Exceptions

The right to cancellation does not set in 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 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 (1) GDPR, insofar as the law referred to in (a) is likely to make it impossible or to seriously impede the attainment of the objectives of such processing; or
- to assert, exercise or defend legal claims.

### 23. Right to Data Portability

The right to cancellation does not set 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 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 (1) GDPR, insofar as the law referred to in (a) is likely to make impossible or to seriously impede the attainment of the objectives of such processing; or
- to assert, exercise or defend legal claims.

### 24. Right to Complain

If you believe that your data protection rights have been violated, you have the right to complain to a supervisory authority.

### 25. Cookie Management

We use cookies and similar technologies on our website. Some are necessary for the website to function, while others help us improve your experience and analyze website traffic. You can manage your cookie preferences at any time through our cookie settings.

### 26. Changes to this Privacy Policy

We reserve the right to update this Privacy Policy to reflect changes in our services, legal requirements, or data processing practices. The current version will be published on our website.

Last updated: [Date]

**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.

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Educational & coaching content. Not legal, medical, psychological, or professional advice.

Contact us

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

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