

Privacy Policy

The Culturengine AS Privacy Policy was updated on July 16, 2019

Your privacy is important to Culturengine and we will do our utmost to protect it. This policy covers how we collect, use, disclose, transfer, and store your information. Please take a moment to familiarize yourself with our privacy practices and [let us know](#) if you have any questions.

Collection and Use of Personal Information

Personal information is data that can be directly used to identify or contact a single person.

What personal information we collect

- When you log into Culturengine through the link we have sent you to participate in an online survey, we may collect a variety of information, including your name, email, company name, gender, age, work country, nationality, work level and job function
- When you answer the questions in the survey, we collect your values priorities data
- When we work with a client, we will collect your and your teams values data and form analytics data to identify development needs and suggest solutions. In the project period, Culturengine will access and use such information to fulfill your requests and provide the relevant product or services made by you or your company

You are asked to provide your personal information when you log into the Culturengine survey. Culturengine and its licensed partners for the individual project may share this personal information with each other and to meet your requests and provide insight about your company or team culture.

Culturengine will after an agreed time anonymize your data and store it in an norm group database for alignment and statistics.

You are not required to provide the personal information that we have requested, but, if you chose not to do so, you can not participate in the survey.

Upon your request, we will anonymize your personal data after the project has been completed, or remove it completely from the database.

How we use your personal information

- We will use your personal information to provide data back to you to help you gain insight in and hereby develop your culture
- We will use your personal information to create, develop, operate, deliver, and improve our products, services, content and advertising
- We may use your personal information, including age and gender, to determine appropriate services and form norm group
- When Culturengine is invited or engaged to participate in conferences or forums, Culturengine may use demographics data and relevant values priorities provided by groups of users in an anonymized form

- From time to time, we may use your personal information to send you important notices, such as communications about access, guidance for use or reminders to complete the survey. Because this information is important to your interaction with Culturengine, you may not opt out of receiving these communications.
- The personal information we collect allows us to keep you posted on Culturengine's latest insights, software updates, and upcoming events. If you don't want to be on our mailing list, you can opt out anytime by emailing post@culturengine.no.

Collection and Use of Non-Personal Information

We also collect data in a form that does not, on its own, permit direct association with any specific individual. We may collect, use, transfer, and disclose non-personal information for any purpose. The following are some examples of non-personal information that we collect and how we may use it:

- We may collect information such as the time it took to complete the Culturengine survey so that we can better understand customer behavior and improve our products, services, and advertising.
- We may collect information regarding customer activities on our website. This information is aggregated and used to help us provide more useful information to our customers and to understand which parts of our website, products, and services are of most interest. Aggregated data is considered non-personal information for the purposes of this Privacy Policy.

Cookies and Other Technologies

Culturengine's websites, online services, interactive applications, email messages, and advertisements may use [cookies and other technologies](#) such as pixel tags and web beacons.

We treat information collected by cookies and other technologies as non-personal information. However, to the extent that Internet Protocol (IP) addresses or similar identifiers are considered personal information by local law, we also treat these identifiers as personal information. Similarly, to the extent that non-personal information is combined with personal information, we treat the combined information as personal information for the purposes of this Privacy Policy.

As is true of most internet services, we gather some information automatically and store it in log files. This information includes Internet Protocol (IP) addresses, browser type and language, Internet service provider (ISP), referring and exit websites and applications, operating system, date/time stamp, and clickstream data.

We use this information to understand and analyze trends, to administer the site, to learn about user behavior on the site, to improve our product and services, and to gather demographic information about our user base as a whole. Culturengine may use this information in our marketing and advertising services.

Disclosure to Third Parties

At times Culturengine may make anonymized personal information available to license partners to provide insights, products and services, or help Culturengine or its partners give quality services to customers. Personal information between license partners and us is regulated through our license agreement and include privacy policy terms in line with this policy.

External Service Providers

Culturengine does not share personal information with other service providers

Mergers and acquisition

In the event of a reorganization, merger, or sale we may transfer any and all personal information we have collected into the relevant third party database.

Others

It may be necessary – by law, legal process, litigation, and/or requests from public and governmental authorities within or outside your country of residence – for Culturengine to disclose your personal information. We may also disclose information about you if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate.

Protection of Personal Information

Culturengine takes the security of your personal information very seriously. Culturengine online services such as the Culturengine Survey System and Dashboard protect your personal information during transit using encryption such as Transport Layer Security (TLS). When your personal data is stored by Culturengine, we use computer systems with limited access housed in facilities using physical security measures.

When you use Culturengine services, or applications or post on a Culturengine website, forum, chat room, or social networking service, the personal information and content you share is visible to other users and can be read, collected, or used by them. You are responsible for the personal information you choose to share or submit in these instances. For example, if you list your name and email address in a LinkedIn site posting, that information is public. Please take care when using these features.

Retention of Personal Information

Culturengine keeps your personal information and values priorities for consultancy application for the ongoing projects. We will retain your personal culture information for the period necessary to fulfill the purposes in the project, then anonymize it unless a longer retention period is agreed or required for future comparisons.

Access to Personal Information

You may be given access to your personal information and values priorities from the survey. We may decline to process requests that are extremely impractical, or for which access is impossible due to earlier anonymisation. Access, correction, or deletion requests can be made through the email post@culturengine.no.

Children & Education

We understand the importance of taking extra precautions to protect the privacy and safety of children using Culturengine products and services. Children under the age of 13, or equivalent minimum age in the relevant jurisdiction, are not permitted to create their own Culturengine IDs, unless their parent provided verifiable consent.

If we learn that we have collected the personal information of a child under 13, or equivalent minimum age depending on jurisdiction, outside the above circumstances we will take steps to delete the information as soon as possible.

Third-Party Sites

Culturengine websites, products, applications, and services may contain links to third-party websites, products, and services. Our products and services may also use or offer products or services from third parties. Third parties in this context are Licence partners, customers recommendations and public educational sites for culture development

International Users

All the information you provide may be transferred or accessed by entities around the world as described in this Privacy Policy. Personal information, relating to Culturengine services, regarding individuals who reside in a member state of the European Economic Area and Switzerland is controlled by Culturengine AS in Norway, and processed on its behalf by Dynamic Elements, Norway. Data are stored in Amazon Web Services, currently located in servers in Ireland

Culturengine uses approved Model Contractual Clauses for the international transfer of personal information collected in the European Economic Area and Switzerland. Culturengine, as a global company, has a number of legal entities in different jurisdictions which are responsible for the personal information which they collect and which is processed on their behalf by Culturengine AS.

Culturengine abides by the Asia-Pacific Economic Cooperation (APEC) Cross Border Privacy Rules System. The APEC CBPR system provides a framework for organizations to ensure protection of personal information transferred among participating APEC economies.

Our Companywide Commitment to Your Privacy

To make sure your personal information is secure, we communicate our privacy and security guidelines to Culturengine employees and strictly enforce privacy safeguards within the company.

Privacy Questions

If you have any questions or concerns about Culturengine's Privacy Policy or data processing or if you would like to make a complaint about a possible breach of local privacy laws, please contact us. You can always contact us by Culturengine Support email post@culturengine.no

When a privacy question or access request is received we have a dedicated team to respond.

Where your issue may be more substantive in nature, more information may be sought from you. All such substantive contacts receive a response. If you are unsatisfied with the reply received, you may refer your complaint to the relevant regulator in your jurisdiction. If you ask us, we will endeavor to provide you with information about relevant complaint avenues which may be applicable to your circumstances.

Culturengine may update its Privacy Policy from time to time. When we change the policy in a material way, a notice will be posted on our website along with the updated Privacy Policy.