

**PERFORMANCE SUPPORT SYSTEMS, INC.
GDPR Compliance Statement**

On December 18, 2018, Performance Support Systems, Inc. (PSS) was given an overall rating of GREEN (system in place) as a result of completing the Data protection self-assessment for small business owners.

The individual responsible for compliance under the GDPR is Paula Schlauch, Vice President, PSS. If you have questions about this statement or would like a copy of the Small Business Owners and Sole Traders Report, please email paula@2020insight.net.

General Information

Performance Support Systems, Inc. (PSS) provides two type of services for which personal data is collected.

20/20 Insight is the desktop and web-based survey services, which includes the collection and storage of survey data, in an online repository known as WebResponse. WebResponse is the online survey data collection component of 20/20 Insight GOLD (20/20 Insight).

Strong for Performance is a self-directed learning service delivered online at the website <https://prostarcoach.com> by Performance Support Systems, Inc.

These services include the collection and storage of data, in an online repository on PSS's secure servers physically located at and serviced by Cogeco Peer1 Hosting, 2300 NW 89th Place, Miami, FL 33172.

20/20 Insight GOLD and WebResponse Information Collection, Use, and Sharing under GDPR

Types of Information Collected and Stored

NOTE: Only the 20/20 Insight survey Administrator and authorized PSS technical personnel who maintain 20/20 Insight and WebResponse have access to personal information.

PSS will ask for only the information that is needed to provide the services requested.

Any personal information entered will be used only for the services requested.

PSS will never give, rent or sell any item of User's personal information to any person, organization or web site for any reason. PSS will not disclose to any third party any information stored on 20/20 Insight and WebResponse or allow unauthorized access to sensitive records for any reason.

Cookies

Cookies are used to maintain a link between User's login session and the PSS server. PSS does not use cookies to collect personally identifiable information or to track usage.

Name and Email Address

Names and email-addresses are the only personal information that is used by 20/20 Insight and WebResponse. It is used solely for the delivery of invitations from the 20/20 Insight and WebResponse to survey Participants.

Individual Username and Password

Survey Participants receive a link to a log-in page where they enter their Username and create their own password to enter the survey (encrypted).

Anonymous Ratings and Comments

Respondent scaled ratings and comments are stored anonymously on 20/20 Insight and WebResponse as raw data.

Only the User and PSS technical support personnel have access to raw data. PSS technical support personnel will NOT access the data unless handling a technical support issue for the User, and then, only with expressed permission from the User.

20/20 Insight GOLD and WebResponse Data Retention under GDPR

PSS responsibilities under GDPR. PSS encourages Users to close and delete projects from WebResponse upon their completion. PSS's sole responsibility under the GDPR is to retain User data on WebResponse for the minimum amount of time considered necessary to adequately service its customers. The life cycle of 20/20 Insight data on WebResponse has been determined to be three years.

As a result, PSS retains data on its WebResponse server for three full previous years plus the current year.

Example: In January 2019, PSS will purge all data synchronized (uploaded) with the WebResponse server prior to December 31, 2015. Data for 2016, 2017, 2018 and 2019 will be retained.

Individual User Responsibility. It is the responsibility of the individual User to determine how long they should retain data in their client-side program in order to adequately service their customers. PSS is not responsible or liable for any data retained in User's client side application.

Strong for Performance and Strong for Achievement Information Collection, Use, and Sharing under GDPR

Strong for Performance and Strong for Achievement have two types of "Users." "Administrators" purchase the administrator dashboard for use with their development programs. "Subscribers" are the individuals who are assigned a one-

year subscription to Strong for Performance or Strong for Achievement by the Administrator.

Types of Information Collected and Stored

The information below applies to all Users unless it's specifically noted otherwise.

Cookies

Cookies are used to maintain a link between User's login session and the PSS server. PSS does not use cookies to collect personally identifiable information or to track usage.

Name and Email Address

Names and email-addresses are the only personal information that is needed to access Strong for Performance or Strong for Achievement.

Individual Password

When each User logs into their account for the first time, they must create a secure password of their choice. Passwords are encrypted.

Action and Reflection Exercises

Each subscriber completes action statements and reflection exercises in order to process and learn new skills attained through the service. Exercises are saved in their Learning Archive and are associated with their secure personal ID, not their individual names.

Statistics

The following statistics are maintained so Administrators can monitor Subscriber usage:

- Subscriber name
- Current focus
- Number of months using Strong for Performance

- Last login date
- Number of content exercises completed
- Number of reflection exercises completed
- Number of exercises completed with requested input
- Number of people in coaching network
- Number of people subscriber is coaching
- Number of times feedback was requested

Strong for Performance and Strong for Achievement Data Retention under GDPR

PSS responsibilities under GDPR. PSS encourages Administrators to delete a subscriber's account from their Dashboard three months after the subscriber's account has expired.

PSS's sole responsibility under the GDPR is to retain Subscriber data for the minimum amount of time considered necessary to adequately service its customers. The life cycle of Strong for Performance data has not been determined but is estimated to be no more than 18 months after the expiration of the subscriber's account.