



Denison Consulting, Inc. Privacy Policy

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PRIVACY POLICY – EMPLOYEE SURVEYS & DATA PROCESSING

Denison Consulting, Inc.

Last updated: 27th March, 2026

This Privacy Policy is aligned with our Data Processing Agreement (“DPA”) and applies specifically to employee surveys, interviews, and organizational assessments conducted on behalf of client organizations.

Denison Consulting, Inc. complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Denison Consulting, Inc. has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. Denison Consulting, Inc. has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit [Data privacy framework website](#).

1. Roles Under Data Protection Law

For employee surveys and related consulting services:

- Denison Consulting, Inc. acts as a Data Processor (EU/UK/CH) and Service Provider (CPRA).
- The client organization acts as the Data Controller / Business.

We process personal data solely on documented client instructions and in accordance with the DPA.

2. Categories of Personal Data Processed

We may process the following categories of personal data on behalf of clients:

- Employee identifiers (e.g., name, email address, role, department, seniority)
- Survey responses and qualitative feedback
- Interview notes and leadership assessment data
- Aggregated and anonymized analytics

3. Purpose Limitation

Personal data is processed exclusively for:

- Organizational diagnostics
- Culture and engagement assessments
- Leadership development insights
- Benchmarking and trend analysis



Data is not used for marketing, advertising, or unrelated purposes.

4. Confidentiality & Access Controls

All personnel processing personal data are bound by confidentiality obligations and access controls consistent with our DPA.

5. Subprocessors

Approved subprocessors (e.g., survey platforms, cloud providers) are contractually bound to data protection obligations consistent with GDPR, UK GDPR, Swiss FADP, CPRA, and the DPF.

6. Disclosure of Personal Data to Third Parties

Denison Consulting Inc. may disclose personal data to third parties only where necessary to support our consulting and professional services and for legitimate business or legal purposes, and always in accordance with applicable data protection laws and contractual obligations.

Categories of Third Parties

We may disclose personal data to the following categories of third parties:

- Service providers and subprocessors, including providers of survey platforms, data analytics tools, cloud hosting, information security, and IT support services, for the purpose of delivering consulting engagements and maintaining our systems
- Professional advisers, such as legal, accounting, audit, and tax advisers, for compliance and business administration purposes
- Business partners and subcontractors engaged to support specific consulting projects, under confidentiality and data protection obligations
- Public authorities or regulators, where disclosure is required by applicable law or in response to lawful requests

Purposes of Disclosure

Personal data is disclosed to third parties solely for the following purposes:

- Delivering employee surveys, interviews, assessments, and related consulting services
- Hosting, processing, and securing data used in consulting engagements
- Business operations, invoicing, and contract administration
- Legal, regulatory, and compliance obligations

We do not sell personal data and do not disclose personal data to third parties for cross-context behavioral advertising or unrelated commercial purposes.

Where personal data is processed on behalf of a client organization, disclosures to third parties are made only in accordance with the client's instructions and our Data Processing Agreement.

7. International Transfers

Cross-border transfers are safeguarded using:

- EU-U.S., UK, and Swiss-U.S. Data Privacy Frameworks
- Standard Contractual Clauses where required



8. Data Retention & Deletion

Employee survey data is retained only for the duration specified in the DPA or Statement of Work and is deleted or anonymized thereafter.

9. Right of Access to Personal Data

Individuals have the right to request confirmation as to whether personal data relating to them is being processed and, where applicable, to request access to that personal data. In addition, individuals have the right to request the correction or amendment of inaccurate or incomplete personal data, as well as the right to request the deletion of their personal data, subject to applicable legal requirements.

Where Denison Consulting, Inc., Inc. processes personal data in the context of employee surveys, interviews, or organizational assessments on behalf of a client organization, we do so as a **data processor or service provider**. In such cases, requests to access personal data should generally be directed to the relevant client organization, which acts as the **data controller or business** and determines how access requests are handled.

Upon receiving a request directly from an individual, we will, where appropriate and in accordance with applicable law and our Data Processing Agreement, notify the relevant client organization and provide reasonable assistance to enable the client to respond to the request within the legally required timeframe.

Access rights may be subject to limitations or exemptions under applicable law, including where providing access would adversely affect the rights and freedoms of others, compromise confidentiality obligations, or where the data has been anonymized or aggregated and can no longer be attributed to an individual.

Individuals seeking to exercise their right of access may contact the relevant client organization or submit an inquiry to GDPRselfCertify@denisonconsulting.com, and their request will be handled in accordance with applicable data protection laws.

10. Choices and Means for Individuals Limiting the Use and Disclosure of Personal Data

In accordance with the EU-U.S. Data Privacy Framework, the UK Extension to the EU-U.S. Data Privacy Framework, and the Swiss-U.S. Data Privacy Framework, Denison Consulting, Inc., Inc. provides individuals with appropriate choices regarding the use and disclosure of their personal data. Where we process personal data on behalf of client organizations in connection with employee surveys or organizational assessments, we do so solely under the client's instructions, and individuals' choices regarding the use or disclosure of their personal data are exercised through the relevant client organization acting as data controller.

If personal data covered by this Privacy Policy is to be used for a new purpose that is materially different from that for which the personal data was originally collected or subsequently authorized, or is to be disclosed to a non-agent third party in a manner not specified in this



Policy, Denison Consulting, Inc. will provide you with an opportunity to choose whether to have your personal data so used or disclosed. Requests to opt out of such uses or disclosures of Personal Data should be sent to us at GDPRselfCertify@denisonconsulting.com.

Certain personal data, such as information about medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs is considered “Sensitive Information.” Denison Consulting, Inc. will not use Sensitive Personal Information for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual unless Denison Consulting, Inc. has received your affirmative and explicit consent (opt-in).

We do not sell personal data and do not disclose personal data for purposes materially different from those for which it was originally collected without providing appropriate notice and choice, except as permitted by applicable law.

11. Data Subject Rights Assistance

We assist clients in responding to data subject rights requests as required under applicable law.

12. Data Privacy Framework – Enforcement and Binding Arbitration

In accordance with the EU-U.S. Data Privacy Framework, the UK Extension to the EU-U.S. Data Privacy Framework, and the Swiss-U.S. Data Privacy Framework, Denison Consulting, Inc. is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC) with respect to its compliance with the Data Privacy Framework Principles.

If an individual has an unresolved complaint regarding our handling of personal data received in reliance on the Data Privacy Framework that has not been satisfactorily addressed through our internal complaint-handling process or through our designated independent recourse mechanism, the individual may, under certain conditions, have the right to invoke binding arbitration in accordance with the Data Privacy Framework’s Arbitration Panel procedures. Binding arbitration is available as a mechanism of last resort, subject to the terms and conditions set forth in Annex I of the Data Privacy Framework Principles.

13. Disclosure in Response to Lawful Requests by Public Authorities

In accordance with applicable law and the EU-U.S. Data Privacy Framework, the UK Extension to the EU-U.S. Data Privacy Framework, and the Swiss-U.S. Data Privacy Framework, Denison Consulting, Inc. may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. Where we receive such a request, we assess it carefully to determine its validity and legality and respond only to the extent required by applicable law. Where permitted, we take reasonable steps to limit the scope of any disclosure and to protect the confidentiality of the personal data involved.

When processing personal data on behalf of client organizations, we act in accordance with our Data Processing Agreement and, where legally permitted, notify or assist the relevant client organization in connection with such requests.



14. Accountability for Onward Transfers to Third Parties

In accordance with the EU-U.S. Data Privacy Framework, the UK Extension to the EU-U.S. Data Privacy Framework, and the Swiss-U.S. Data Privacy Framework, Denison Consulting, Inc. remains liable for the processing of personal data transferred to third parties acting as agents on our behalf, unless we demonstrate that we are not responsible for the event giving rise to the damage.

We transfer personal data to third parties only for limited and specified purposes and only to those that have provided assurances that they will process the personal data in a manner consistent with the Data Privacy Framework Principles and applicable data protection laws. Such transfers are governed by written agreements requiring the third party to provide at least the same level of protection as required under the Data Privacy Framework Principles.

Where we become aware that a third party acting as our agent is processing personal data in a manner inconsistent with the Data Privacy Framework Principles, we will take reasonable and appropriate steps to stop and remediate such processing, including suspension or termination of the transfer where necessary.

When processing personal data on behalf of client organizations, onward transfers are made only in accordance with our Data Processing Agreement and the documented instructions of the relevant client organization.

15. Security Measures

We implement technical and organizational measures including encryption, role-based access, and secure storage.

16. California (CPRA) Alignment

When processing employee survey data, we act as a Service Provider and do not sell or share personal information.

17. Contact

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, Denison Consulting, Inc. commits to resolve DPF Principles-related complaints about our collection and use of your personal information. EU, UK, and Swiss individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF should first contact Denison Consulting, Inc. at: GDPRselfCertify@denisonconsulting.com

18. Alternative Dispute Resolution Provider

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, Denison Consulting, Inc. commits to refer unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF to PrivacyTrust, an alternative dispute resolution provider based in the



United States. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit <https://privacytrust.com/services/data-privacy-framework/dispute-resolution/> for more information or to file a complaint. The services of PrivacyTrust are provided at no cost to you.