

# Privacy Policy Statement

Linchpin People (LPP) has created this Privacy Policy Statement in order to inform you of our commitment to privacy and to describe our policies for the collection, use, and disclosure of personal information that may be collected by LPP when you visit our websites or use certain LPP products. In a few cases, LPP's other websites may contain additional privacy policies. Your visits to those sites will be governed by the privacy policies, if any, that govern those sites.

PLEASE REVIEW THIS PRIVACY POLICY BEFORE USING THIS SITE. IF YOU DO NOT AGREE WITH OUR PRIVACY POLICY, DO NOT USE THE SITE. BY SUBMITTING ANY PERSONAL INFORMATION TO THE SITE, YOU AGREE TO BE BOUND BY THE TERMS OF THIS PRIVACY POLICY STATEMENT.

Your use of this site is also subject to the [Privacy Statement](#). Please review those Terms of Use for additional details regarding your use of this site.

## GENERAL INFORMATION

### IP Addresses and Cookies

Generally speaking, you may visit the site while remaining anonymous and not revealing any personal information.

Our websites automatically log your IP address and domain name, and non-personal information such as the type of web browser you use, to help us better administer the sites and to compile statistics such as the number of visitors who connect with us.

### Submission of Personal Information

Certain portions of the site may require that you submit some personal information, such as your name and email address, before using those portions of the site. At minimum, you are typically required to register with the site and provide your name or email address before using any of the Members Only areas of the site. For some services, such as forums, customer support features, registering for events, downloading software or uploading content, you may have to create an account, and submit additional personal information such as your mailing address.

### Use of Personal Information

LPP uses information it collects to provide the services and information you select, to better understand its customers, to provide better content and services, and to assist with site administration, such as with troubleshooting any problems, detecting fraud, resolving disputes, and for any purposes deemed necessary or required by LPP to enforce the Terms of Use and other terms or conditions applicable to any portion of the site.

We also use this information to send you information about LPP, or other topics LPP thinks may be of interest to you, such as content and event information or updates. As part of its activities, LPP works with authorized sponsors, who provide Open Source Software and Solutions to government. As part of those activities, LPP may share your information with those authorized entities so that they can directly provide the information or services to you at your request.

The processing of your data is either based on your consent or in case the processing is necessary for the performance of a contract to which you are a party, or in order to take steps at your request prior to entering into a contract.

If the processing is based on your consent, you may at any time withdraw your consent by contacting us at [Data Privacy Officer](#) or the address listed below.

LPP keeps the information you provide for as long as you remain an active user of the site and recipient of our information.

## Aggregation and Use of Anonymous Data

LPP aggregates information provided by you to create anonymous statistical and demographic data. This anonymous data helps LPP to understand and know its user base better. That anonymous data may be provided to third parties but never in such a fashion as to identify you personally. Some LPP products and websites use Google Analytics for the collection of anonymous data. [Learn more about how Google uses data collected using Google Analytics.](#)

The Google Analytics features that LPP employs are as follows:

- General Features related to browsing behavior such as: browser type/version and language, operating system type/version, device type/version, domains, page views, referring/exit pages, location data such as country, information about how you interact with our Site's webpages and with third-party links, traffic and usage trends;
- Demographics and Interest Reports: Age, Gender, Interest Data;
- Site Search Tracking: What a user typed into the sites search feature;
- eCommerce Tracking: Information related to any purchases, price, date and time of purchase, order #, etc.;
- Enhanced eCommerce Tracking: Information related to items viewed, items added/removed to cart, onsite promotions clicked, currency, refunds, etc.;

You can opt out of Google Analytics by using this tool:

<https://tools.google.com/dlpage/gaoptout/>

## Third Parties

LPP does not sell to third parties information you have submitted to this site that identifies you personally.

On occasion, LPP may offer in conjunction with third parties certain services that may require you to share your personal information with that third party as a condition for receiving that service. In addition, if you download content from a third party on the LPP site, LPP may share your information with the authorized sponsors of that product. While LPP will treat any information it receives in accordance with this Privacy Policy Statement, LPP will not be responsible for the information submitted by you to that third party, and we remind you to review the applicable rules and any third party's applicable privacy policies separately before participating in such service.

## Declining Information

You can opt out of receiving LPP informational messages; see the Accept/Decline section below. Please note that it may take us a reasonable amount of time to process your request.

Even if you decline to receive information or cancel your account, LPP reserves the right to use the information you previously provided to provide you with the LPP information and services you are eligible to receive and to contact you about administrative matters relating to your use of any portion of the site, your account, or about any issues relating to the Terms of Use, this Privacy Policy, or any other policy then in-effect.

## Public Forums for User Materials

Certain portions of the site are designed to offer you the opportunity to post information on the site, including but not limited to information about yourself ("User Materials"). You should always remember that publicly displayed information is public. For example, you may be permitted to post your resume information, a video you have created, or to post messages in any chat rooms, message boards, mailing lists, and/or news groups this site makes available to its users. If you use a forum, bulletin board or chat room on an LPP website you should be aware that any information you share is visible to other users.

Personally identifiable information you submit to one of these forums can be read, collected, or used by other individuals to send you unsolicited messages.

LPP is not responsible for the personally identifiable information you choose to submit in these forums.

Please see the [Privacy Statement](#) for additional terms related to LPP's forums and posting of User Materials.

## Law Enforcement

As noted in the Terms of Use, LPP intends to cooperate with any order or request from law enforcement officials or a court of competent jurisdiction for information as to the identity of individuals submitting or posting information to LPP or on this site. Such orders or requests supersede the terms of this Privacy Policy. Similarly, notifications of

claimed copyright infringement, counter notifications or other information submitted to and necessary to process a notification under our Copyright Complaint Policy are also exempt from this Privacy Policy.

## LPP Links to Other Sites and Advertising

This site may display advertisements and/or links to third parties. LPP is not responsible for the privacy practices or the content of those websites. Please refer to that company's privacy policy for further information.

## Surveys

From time to time LPP may make online surveys available to users of the site. Participation in those surveys is voluntary. Some online surveys may ask participants for personal information, such as an email address, in addition to requesting answers to survey questions. LPP may use that personal information to contact the participant if necessary, or as otherwise described above. LPP may make the results of any survey publicly available, although LPP will not attribute any particular response to you without your permission.

## SUPPORT DATA

Support Data will be used only to provide customers with support, including purposes compatible with providing support, such as troubleshooting recurring issues and improvements to support or to content and services. LPP will only use Support Data or derive information from it for technical support purposes.

## SECURITY

### General Issues

Generally speaking, this site has security measures in place to protect against the loss, misuse and alteration of the information under our control. No security measures are 100% effective and LPP does not warrant the security of your personal information. Since the site under general usage does not collect financial information, LPP uses the standard internet connections for those general usage portions of the site, without secured sockets.

### Specific Services

This site may provide certain additional, optional services that may use additional security measures to protect the information, such as financial information, provided by you to obtain the service. Those additional security measures may vary, depending upon the particular service offered. You will be informed of any specific security measures at the time you register for a particular service. Please review that information for further detail.

## Site Registration

In some cases, you may be prompted to register with the site to undertake a particular site activity or obtain a particular service. As part of that registration, you may be asked to choose your own password. LPP reminds you to protect your password, and not provide it to others to use. Allowing others to access and use your account and password can compromise the security of your information. LPP disclaims any responsibility or obligation for your decision to provide your password to others.

## CHANGES TO THIS POLICY

If and when LPP makes changes to this site and its contents and services, LPP may have to update this Privacy Policy Statement to better reflect those changes. Because changes to this site or updates to this Privacy Policy Statement may occur, you should review this Privacy Policy Statement from time to time. Remember, your decision to continue using this site after this Privacy Policy Statement is updated will signify that you have agreed to any new terms.

## ACCEPT/DECLINE

Typically you accept to receive communications when you submit information to the site. If you wish to remove your information from the site registration database and no longer receive future communications or use any services, you may do so through any of the methods described below. Please note that it may take us a reasonable amount of time to process your request.

1. The Profile section of this site may permit you to change a previous selection and decline to receive further communications, or to delete your registration.
2. A particular service may have an Administration section that allows you to change any previous selections for that service.
3. You can send an email to [Data Privacy Officer](#) for assistance in deleting/changing your prior selections or to unsubscribe at any time by clicking here.

## CORRECT/UPDATE

This site gives users the following options for changing and modifying information previously provided.

1. The Profile section of this site may permit a registered user to change or modify information previously provided.
2. A particular service may have an Administration section that allows you to change or modify information you previously provided for that service.
3. You can send an email [Data Privacy Officer](#) for assistance in deleting/changing your prior selections.

## RIGHTS UNDER THE GDPR

LPP is compliant with the General Data Protection Regulation (GDPR). Under that regulation, you have the right to (a) be informed about LPP's use of your data, (b) to

access the data LPP has collected from you, (c) to correct any mistakes in the data LPP has collected, (d) the right to have the data LPP has collected erased, (e) to restrict processing (f) to portability of the information LPP has collected, (g) to object to the collection and processing of information, and (h) to not be profiled. To exercise any of these rights, please contact LPP at [Data Privacy Officer](#) or via mail at the address below.

## CONTACTING THE WEBSITE

If you have any questions about this privacy statement, the practices of this site, or your dealings with this site, you can contact the LPP at the following address and email:

Linchpin People LLC  
ATTN: [Data Privacy Officer](#)  
2603 Greenland Lane  
Austin, TX 78745-5249  
U.S.A

## NOTICE TO EUROPEAN USERS

Please note that the information you enter on the site or otherwise provide to Open Source Software Institute or its subsidiaries or divisions, may be transferred outside of the European Economic Area, for purposes of processing, by Linchpin People LLC, a company located in Austin, Texas, U.S.A., or its satellite offices, or LPP's subsidiaries or divisions, or authorized sponsors, located worldwide, in order to provide this site and its services to you. You are advised that the United States uses a sectoral model of privacy protection that relies on a mix of legislation, governmental regulation, and self-regulation. You are further advised that the Council of the European Union has found that this model does not provide "adequate" privacy protections as contemplated by Article 25 of the European Union's Data Directive. (Directive 95/46/EC, 1995 O.J. (L 281) 31).

Article 26 of the European Union's Data Directive allows for transfer of personal data from the European Union to a third country if the individual has unambiguously given his consent to the transfer of personal information, regardless of the third country's level of protection.

By agreeing to this Policy, you consent to the transfer of all such information to the United States and the processing of that information as described in this Policy.