

PRIVACY POLICY

Centro Forza Group, LLC

Effective Date: 18th May 2026

Centro Forza Group, LLC (“Company,” “we,” “us,” or “our”) is committed to protecting your privacy and handling your information in an open, transparent, and responsible manner. This Privacy Policy explains in detail how we collect, use, disclose, and safeguard your personal information when you visit our website www.centroforzagroup.com (the “Website”), engage with our executive coaching, leadership development, or consulting services, purchase coaching programs, attend workshops or webinars, download resources, or otherwise interact with us (collectively, the “Services”).

By accessing or using our Website or Services, you signify that you have read, understood, and agree to the practices described in this Privacy Policy. If you do not agree with this policy, please do not use our Website or Services. This Privacy Policy is incorporated into and made a part of our Terms of Use and Disclaimer.

1. INFORMATION WE COLLECT

We collect information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked with a particular individual or household (“Personal Information”). We collect the following categories of Personal Information:

1.1 Information You Provide Directly to Us

We collect information you voluntarily provide when you fill out forms, create an account, sign up for a program, correspond with us, or otherwise communicate with us. This includes:

- **Contact Information:** Full name, email address, telephone number, mailing address, and company or organization name.
- **Account and Registration Details:** Username, password, professional title, role, industry, and preferences.
- **Coaching and Service-Related Information:** Intake forms, self-assessments, leadership goals, professional challenges, session feedback, coaching notes, survey responses, and other information you share to help us tailor our Services to your development needs.
- **Payment and Transaction Information:** Billing address, payment card details (processed securely through our third-party payment processors; we do not store full credit card numbers or CVV codes on our own systems), purchase history, and records of program enrollments or installment plans.
- **Communications and Interactions:** Inquiries, support requests, emails, chat messages, event registrations, and any testimonials, reviews, or feedback you choose to submit.
- **Any Other Information** you voluntarily provide through contact forms, applications, or when you interact with our team.

1.2 Information Collected Automatically

When you access or use our Website, we and our third-party service providers may automatically collect certain information through cookies, web beacons, pixels, server logs, and similar tracking technologies. This information may include:

- **Device and Technical Identifiers:** IP address, browser type and version, operating system, device type, unique device identifiers, and mobile network information.

- **Browsing and Usage Data:** Pages visited, time spent on pages, clickstream data, navigation paths, referring/exit URLs, date and time stamps, and interactions with content and features.
- **Geolocation Data:** General geographic location (e.g., city, state, country) derived from your IP address. We do not collect precise geolocation data without your explicit consent.
- **Cookie and Tracking Data:** Information stored or accessed through cookies, pixel tags, and similar technologies. For more details, see Section 3 (Cookies and Tracking Technologies).

1.3 Information from Third Parties and Public Sources

We may receive Personal Information from other sources to help us deliver and improve our Services, such as:

- **Business and Marketing Partners:** Analytics providers, advertising networks, social media platforms, and event co-hosts.
- **Platforms and Integrations:** Video conferencing tools (e.g., Zoom), scheduling applications, email marketing services, customer relationship management platforms, and survey tools that you interact with in connection with our Services.
- **Payment Processors:** Confirmation of successful transactions and limited transaction details.
- **Publicly Available Sources:** Professional networking sites (e.g., LinkedIn) and public databases, where relevant to our legitimate business interests.

We may combine information we receive from these sources with information you provide and information we collect automatically. If we do so, we treat the combined information as Personal Information in accordance with this policy.

2. HOW WE USE YOUR INFORMATION

We use the Personal Information we collect for the following business and commercial purposes:

- **To Provide and Manage Our Services:** Deliver executive coaching, leadership programs, workshops, and downloadable resources; create and administer your account; process and fulfill transactions, including managing subscriptions and installment payments; send invoices, receipts, and payment confirmations.
- **To Personalize Your Experience:** Tailor coaching content, learning pathways, and recommendations based on your goals, preferences, and professional context.
- **To Communicate with You:** Send appointment reminders, program updates, service-related announcements, and technical notices; respond to your inquiries, support requests, and feedback.
- **To Deliver Marketing and Educational Content:** Provide newsletters, thought leadership articles, event invitations, and promotional materials about services we believe may be of interest to you, in compliance with applicable law and your communication preferences.
- **For Research, Analytics, and Improvement:** Analyze usage trends, measure the effectiveness of our programs and marketing campaigns, conduct internal quality reviews, and improve the functionality and content of our Website and Services.
- **To Maintain Security and Prevent Misuse:** Detect, investigate, and prevent fraudulent, unauthorized, or illegal activity; protect the rights, property, and safety of our Company, our clients, and the public; monitor compliance with our Terms of Use and policies.

- **To Comply with Legal Obligations:** Adhere to applicable laws, regulations, court orders, government requests, and industry standards; establish, exercise, or defend legal claims.
- **To Facilitate Business Transactions:** Evaluate or execute a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets.
- **With Your Consent:** For any other purpose disclosed to you at the time we collect your Personal Information, provided we have obtained your consent to the extent required by law.

3. COOKIES AND TRACKING TECHNOLOGIES

Our Website uses cookies, web beacons, pixels, local storage, and similar technologies to enhance your experience, analyze site usage, and support our marketing efforts. Cookies are small text files stored on your device by a web browser.

3.1 Types of Cookies We Use

- **Strictly Necessary Cookies:** These are essential for the operation of our Website. They enable core functionality such as security, network management, and accessibility. You cannot opt out of these cookies without impacting how the Website functions.
- **Performance and Analytics Cookies:** These cookies help us understand how visitors interact with our Website by collecting information about traffic, popular pages, and navigation patterns. We use tools like Google Analytics to improve site performance and user experience. The data collected is aggregated and anonymized where possible.
- **Functionality Cookies:** These cookies allow us to remember choices you make (such as your language preference or region) and provide enhanced, more personalized features.
- **Targeting and Advertising Cookies:** We and our third-party partners may use these cookies to deliver relevant advertisements to you on other sites and to measure the effectiveness of our marketing campaigns. Where required by law, we will obtain your consent before placing these cookies.

3.2 Your Choices

You can manage cookie preferences through your browser settings. Most browsers allow you to refuse or delete cookies, or to be notified when a cookie is being sent. You can also opt out of certain data collection by Google Analytics by installing the Google Analytics Opt-out Browser Add-on. In addition, we honor the Global Privacy Control (GPC) signal and “Do Not Track” signals where required by applicable law. Please note that disabling certain cookies may impact the functionality and features of our Website.

4. SHARING AND DISCLOSURE OF YOUR INFORMATION

We do not sell your Personal Information and have not sold Personal Information in the preceding 12 months. We do not share Personal Information with third parties for their own direct marketing purposes without your explicit consent. We may share your information only in the following circumstances:

4.1 Service Providers

We engage trusted third-party companies and individuals to perform functions on our behalf, such as website hosting and maintenance, payment processing, email and marketing automation, video conferencing, scheduling, customer relationship management (CRM), analytics, data storage, and professional services (e.g., legal, accounting). These service providers have access to Personal Information only to the extent necessary to perform their tasks on our behalf and are contractually

obligated to protect the confidentiality and security of your data, to use it only for the specified services, and to comply with applicable privacy laws.

4.2 Legal and Compliance Obligations

We may disclose your Personal Information to courts, law enforcement authorities, regulators, or other government bodies when we believe disclosure is reasonably necessary to: (a) comply with any applicable law, regulation, legal process, or governmental request; (b) enforce our Terms of Use or other agreements; (c) detect, prevent, or address fraud, security, or technical issues; or (d) protect the rights, property, or safety of Centro Forza Group, our clients, or the public.

4.3 Business Transfers

In the event of a merger, acquisition, reorganization, joint venture, assignment, financing, or sale of all or a portion of our assets, your Personal Information may be transferred to the acquiring entity or third party as part of that transaction. We will use reasonable efforts to direct the transferee to use your Personal Information in a manner consistent with this Privacy Policy and to provide you with notice if your information would be used contrary to this policy.

4.4 With Your Consent

We may share your Personal Information for other purposes with your explicit consent or at your direction.

5. DATA SECURITY

We implement and maintain reasonable administrative, technical, and physical safeguards designed to protect the confidentiality, integrity, and availability of your Personal Information. These measures may include data encryption, firewalls, secure socket layer (SSL) technology, access controls, regular security assessments, and staff training. Despite our efforts, no security controls are 100% effective, and we cannot guarantee the absolute security of your information during transmission or while stored on our systems. We strongly encourage you to take steps to protect your own information, such as using strong passwords and keeping login credentials confidential.

6. DATA RETENTION

We retain your Personal Information for as long as is reasonably necessary to fulfill the purposes for which it was collected, as described in this Privacy Policy, or as required by applicable law. The specific retention period depends on the nature of the information and the context of our relationship with you. Factors we consider include:

- The duration of your engagement with our Services and the length of time needed to complete the coaching relationship and any follow-up.
- Legal obligations to retain records (e.g., tax, accounting, employment, or regulatory requirements).
- The existence of pending or threatened litigation or other legal proceedings that require preservation of relevant records.
- Our legitimate business interests, such as maintaining business records, analyzing program effectiveness, and defending against potential claims.

When your Personal Information is no longer needed, we will securely delete, destroy, or anonymize it in accordance with our data disposal policies.

7. YOUR RIGHTS AND CHOICES

Depending on your jurisdiction, you may have certain rights regarding your Personal Information. We are committed to respecting and facilitating these rights.

7.1 General Rights for All U.S. Residents

You may have the right to:

- **Access and Data Portability:** Request confirmation of whether we process your Personal Information and, if so, obtain a copy of the specific pieces of Personal Information we hold about you in a portable format.
- **Correction:** Request correction of inaccurate or incomplete Personal Information.
- **Deletion:** Request deletion of your Personal Information, subject to certain exceptions (such as legal obligations or legitimate business needs).
- **Opt-Out of Marketing:** Unsubscribe from promotional emails by clicking the “unsubscribe” link in any marketing email or by contacting us directly. Even if you opt out of marketing, you will still receive transactional and service-related communications.

To exercise any of these rights, please contact us using the details in Section 12. We will verify your identity before processing your request, which may require you to provide sufficient information to allow us to reasonably confirm you are the person about whom we collected Personal Information. We will respond to verifiable requests within the timeframe required by law.

7.2 California Residents – California Consumer Privacy Act (CCPA/CPRA)

If you are a California resident, you have additional rights under the California Consumer Privacy Act, as amended by the California Privacy Rights Act. These include:

- **Right to Know:** You can request information about the categories of Personal Information we have collected about you, the sources from which it was collected, the business or commercial purpose for collection, and the categories of third parties with whom we share it.
- **Right to Access:** You can request a copy of the specific pieces of Personal Information we have collected about you.
- **Right to Deletion:** You can request that we delete Personal Information we have collected from you, subject to certain exceptions.
- **Right to Correct:** You can request that we correct inaccurate Personal Information.
- **Right to Opt-Out of Sale/Sharing:** We do not sell Personal Information, nor do we share it for cross-context behavioral advertising, so there is no need to opt out of these activities.
- **Right to Non-Discrimination:** We will not discriminate against you for exercising any of your CCPA rights.

To exercise your California privacy rights, please submit a verifiable consumer request to us using the contact information below. Only you, or an authorized agent registered with the California Secretary of State that you authorize to act on your behalf, may make a request. We will verify your identity by matching the information you provide with the information we have on file.

7.3 Residents of the European Union / European Economic Area and the United Kingdom – GDPR

If you are located in the EU/EEA or UK, the General Data Protection Regulation (GDPR) or UK GDPR grants you specific rights. Centro Forza Group acts as a “data controller” for your Personal Information processed through our Website and Services. Our legal bases for processing your Personal Information include:

- **Performance of a Contract:** To provide the Services you request.
- **Legitimate Interests:** For our legitimate business purposes, such as improving our Services, marketing to you (where permitted), and ensuring security, provided these interests are not overridden by your data protection rights.
- **Consent:** Where you have given clear consent for a specific processing activity (e.g., receiving marketing emails).
- **Legal Obligation:** To comply with applicable laws.

Your rights under GDPR/UK GDPR include:

- **Right to Access:** Obtain confirmation and a copy of your Personal Information.
- **Right to Rectification:** Have inaccurate data corrected.
- **Right to Erasure ('Right to be Forgotten'):** Have your data deleted in certain circumstances.
- **Right to Restriction of Processing:** Limit how we use your data.
- **Right to Data Portability:** Receive your data in a structured, machine-readable format.
- **Right to Object:** Object to processing based on legitimate interests or for direct marketing.
- **Right to Withdraw Consent:** Where processing is based on consent, you can withdraw it at any time.

To exercise these rights, or if you have any questions about the legal basis for our processing, please contact us using the details in Section 12. You also have the right to lodge a complaint with your local data protection supervisory authority.

8. CHILDREN'S PRIVACY

Our Website and Services are intended for a general business audience and are not directed to, nor do we knowingly collect Personal Information from, individuals under the age of 18. If we become aware that a person under 18 has provided us with Personal Information, we will take immediate steps to delete such information from our records. If you are a parent or guardian and believe we have collected information from your child, please contact us.

9. THIRD-PARTY LINKS AND SERVICES

Our Website may contain links to third-party websites, plugins, and applications that are not owned or controlled by us. This Privacy Policy does not apply to those third parties. We are not responsible for the privacy practices, content, or security of any third-party sites. We encourage you to review the privacy policies of any third-party services you interact with before providing them with your Personal Information.

10. INTERNATIONAL DATA TRANSFERS

Centro Forza Group is based in the United States, and your Personal Information will be processed and stored in the United States. If you are located outside the United States, please be aware that data protection laws in the United States may not offer the same level of protection as those in your country of residence. By using our Services, you understand and consent to the transfer of your Personal Information to the United States. Where required by applicable law, we will implement appropriate safeguards, such as standard contractual clauses, to protect your data during such transfers. You may request details of these safeguards by contacting us.

11. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time to reflect changes in our practices, technologies, legal requirements, or for other operational reasons. When we make material changes, we will notify you by posting the updated policy on our Website with a new “Effective Date” and, where appropriate, by sending an email to the address you have provided or by providing a prominent notice on our Website. We encourage you to review this Privacy Policy periodically. Your continued use of the Website or Services after the posting of changes constitutes your binding acceptance of the updated policy.

12. CONTACT US

If you have any questions, concerns, or requests regarding this Privacy Policy, our data practices, or your rights, please do not hesitate to contact us:

Centro Forza Group, LLC

Gina M. Catalano, Founder & President

Raleigh, North Carolina

Website: www.centroforzagroup.com

Email: info@centroforzagroup.com

We will make every effort to resolve your concerns promptly and fairly. Thank you for trusting Centro Forza Group with your information. We are dedicated to safeguarding your privacy while supporting your leadership and professional growth.