Gartner C-level Communities Privacy Policy

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Gartner C-level Communities (formerly Evanta) is committed to protecting your information. Please read this Privacy Policy ("the Policy") carefully as it sets out important information relating to how we handle your personal information.

PLEASE NOTE: Section 2 of the Policy has been updated to disclose that we may share your personal information with other Gartner Group companies. Please review this language in more detail below.

How to Contact Us

Questions, comments and requests regarding this Privacy Policy should be addressed to our Data Protection Office by completing the form at www.gartner.com/personaldatarequest, via email at privacy@gartner.com, or regular mail at:

Global Data Protection Office
Legal Department
56 Top Gallant Road
Stamford, CT 06902
USA

Introduction

This Policy sets out how we will collect and use personal information, and your choices and rights regarding our use of your personal information.

This Policy describes our practices when using your information when you:

a) Express an interest in or have signed up for our events or products including newsletters, apps, extensions

b) Attend a Gartner C-level Communities event; or

c) Visit our websites or social media sites.

This Policy sets out how we will collect and use personal information, and your choices and rights regarding our use of your personal information.

1. Information That We Collect About You

1.1 Data Collection and Usage

Information we collect directly from you or from the following sources:

- **Third party referrals including from within the Gartner group of companies;**
- **Social media sites and other public internet sites, such as LinkedIn; and**
- **Public resources such as telephone directories, newspapers, internet sites, commercially available marketing lists, registries or public records.**

Categories of information we collect about you include:	• Personal information such as name, contact details, and company name • Communications with you • Information you provide when posting content on social media sites;
We use this information for certain activities, including:	• Facilitating the business through communication with corporate clients and other business contacts, for example, to communicate about our events, products and services and to manage our events • For internal analysis and research to help us improve our services; • To send marketing to business contacts regarding our services and events which may be of interest and to promote our business and brand; • Administering our website, investigating any complaints and providing customer service; • Monitoring social media content to manage relations with our clients and promote our business and brand;

We use this information because:	• It is necessary for performing our obligations, or exercising our contractual rights;
	• It is necessary to comply with applicable laws or regulations;
	• We have a legitimate business interest to:
	  • Manage and promote our business and brand;
	  • Provide and improve our services;
	• We have your consent (where required under applicable law) to use your information for marketing. Where we rely upon your consent, you have the right to withdraw consent by contacting us.

Information we collect when you attend one of our in-person or virtual events:

Categories of information we collect about you include:	• Information you provide us when registering your attendance such as name, business email address, profile photograph, job title, organization, email address, and phone number; • Information collected when we record one of our events; • Information collected when we scan your badge to check in to a general session or a breakroom session;
We use this information for certain activities, including:	• Enabling you to attend our events; • Conducting our events; • Marketing our events through the use of video; • Providing recordings of certain event sessions to interested business contacts, attendees and online through our website or Gartner C-level Communities's partner's website; • To provide aggregate reports on user demographics, survey responses, discussions, and peer questions to attendees, sponsors and partners; • To provide Attendees and eligible sponsors post conference aggregate demographics of those who attended the event. Attendees and eligible sponsors will receive registration information (including first name, last name, title, organization, email, address, and phone number) for attendees of the event, a sponsored general session, or breakroom session;

We use this information because:	• It is necessary for performing our obligations, or exercising our contractual rights;
	• It is necessary to comply with applicable laws or regulations;
	• We have a legitimate business interest to:
	  • Manage and promote our business and brand;
	  • Provide and improve our services;
	  • Provide and improve our services;
	  • Collect relevant information for hospitality and health and safety purposes;

Information we collect from users of:

- **Our website;**
- **Our apps;**
- **Gartner C-level Communities webpages on social media such as LinkedIn or Twitter.**

Categories of information we collect about you include:	• Information you provide when you enter information on our website, such as when you provide contact details, answer online questionnaires, or feedback forms; • Information you provide when you subscribe to email newsletters such as name, email address, job title, etc.; • Information you provide when registering for an online account on our Sites; • Where you have an online account, log in credentials and information about your use of and preferences for these services;
We use this information for certain activities, including:	• Enabling you to access your Gartner C-level Communities accounts across devices; • Personalizing your experience of our website, extension and apps; • Administering our website, extension and apps; • Investigating any complaints and providing customer service; • Monitoring social media content to manage relations with our clients and promote our business and brand;

We use this information because:	• It is necessary for performing our obligations or exercising our rights;
	• It is necessary to comply with applicable laws or regulations;
	• We have a legitimate business interest to:
	  • Promote our brand and business through our website and through social media tools;
	  • Monitor, investigate and report any attempts to breach the security of our website;
	  • Provide and improve our services including our website and our apps;
	  • Grow our business;
	• We have your consent (where required under applicable law) to use your information for marketing. Where we rely on your consent, you have the right to withdraw consent by contacting us.

Information we collect about the use of our website and apps from users.

Categories of information we collect about you include:	• Information captured in our web logs such as device information (including IP address and device ID), unique application identification numbers (e.g. IP address and device ID), and browser information (e.g. URL, browser type, pages visited, date/time of access), and other device specific information, Internet connection details, and cookies; • Advertising information (such as size/type of ad, ad impressions, location/format of ad, data about interactions with ad); • Behavioral information (such as information on the behavior or preferences of users of our Sites, which may be associated with individuals and may be used to create a user profile); and • Information captured by our cookies (see our Cookie Policy)
We use this information for certain activities, including:	• Personalizing the experience of our website; • Administering our website; • Performing statistical and trend analysis to improve the user experience and performance of our website;

We use this information because:	• It is necessary to comply with applicable laws and regulations;
	• We have a legitimate business interest to:
	  • Monitor, investigate and report any attempts to breach the security of our website;
	  • Improve the performance and user experience of our websites;

1.2 Special categories of information

Certain types of personal information are more sensitive than others. This includes information about health, disability, race, ethnicity, criminal offences (or alleged offences), political opinions, biometric information or religion. It is voluntary for you to disclose this information, but where we collect and receive these types of information about you, we have identified the type of special information, how we will use it and why we will use it.

Information we collect when you attend one of our in-person or virtual events.

Categories of information we collect about you include:	• Dietary requirements that may imply specific religious beliefs or medical conditions; • Any physical or mental disability or impairment you may disclose to us;
We use this information for certain activities, including:	• Providing hospitality that is suitable for attendees of our events;
We use this information because:	• You have consented by providing us with the information. Where we rely on your consent, you have the right to withdraw your consent by contacting us.

1.3 Further information

Where we collect and use information for our legitimate interests as mentioned above, a legitimate interest will only apply when we consider that your interests or rights requiring protection of your personal information do not override our legitimate interests. For more information regarding our legitimate interests as applied to your personal information, you may contact us.

Our websites and online services are for individuals who are at least 18 years of age. Our online services are not designed to be used by individuals under the age of 18.

In certain circumstances, if you do not provide personal information which is required (for example, in relation to activating your registration or Gartner C-level Communities Event app), we will not be able to perform our contractual obligations or provide you with products and services. When this is the case, we will make it clear.

2. When We Disclose Your Information

We may disclose your information to third parties as follows:

- To Gartner group companies in order to process the data for the above mentioned purposes;
- To third parties who work on our behalf to service or maintain business contact databases and to process the data on our behalf, such as our IT service providers, our telecommunications provider, or who provide other technical services, such as registration, event printing (badges, signage, etc.);
- To third parties providing services to us or on our behalf who have a need to access your information, such as our professional advisors (e.g. auditors and lawyers) or venues for our events;
- To comply with applicable laws, protect rights, safety and property, and respond to lawful requests by public authorities, such as disclosing data in appropriate situations for national security or law enforcement purposes; and
- Subject to applicable law, in the event that Gartner C-level Communities is merged, sold, or in the event of a transfer of some or all of our assets (including in bankruptcy), or in the event of another corporate change, in connection with such a transaction, or for pre-transaction review in relation to such transactions.

Event attendance information may be shared: we anonymized and/or aggregated reporting set out below:

- To other attendees, sponsors and partners who receive aggregate reports on user demographics, survey responses, discussions, and peer questions; and
- To other attendees and eligible sponsors who receive a post conference report with aggregate demographics of those who attended the event.

We may include your registration information (including first name, last name, title, organization, email, business address, and phone number) on a post conference attendee list and disclose to eligible sponsors as set out below. To opt-out of having your personal information shared with these sponsors, please email clevelcommunitiesinfo@gartner.com

- A list that includes all who attended the event; and
- A list that includes all who attended their sponsored general session or breakroom session.

Any subsequent use of your personal information by the eligible sponsors will be subject to the privacy policy of the relevant sponsor.

3. International Transfers

Gartner C-level Communities is a global company and we may transfer personal information to other Gartner group companies or suppliers outside your country. Gartner for C-level Communities will take appropriate steps to ensure that personal information is protected and any such transfers comply with applicable law.

Gartner C-level Communities may transfer and maintain the personal information of individuals covered by this Policy on servers or databases outside the European Economic Area (EEA). Some of these countries may not have the equivalent level of protection under their data protection laws as in the EEA.

The countries to which we transfer data outside of the EEA may include any of the countries in which Gartner C-level Communities does business.

All Gartner entities, including Evanta, have signed an Intragroup Agreement containing the European Union ("EU") Commission Approved Standard Contractual Clauses for the transfer of data outside the European Economic Area. All Gartner entities have the same technical, physical, and administrative security controls and are required to comply with our data protection policies and procedures, applicable laws, and the terms of our client and member contracts governing the collection and use of information.

Gartner C-level Communities complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and 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 US Department of Commerce. For more information, refer to our Data Privacy Framework Notice.

4. Retention Periods

We will retain your personal information for as long as required to perform the purposes for which the data was collected, depending on the legal basis for which that data was obtained and/or whether additional legal/regulatory obligations require us to retain it.

In general terms, this will mean that your personal information will be kept for the duration of our relationship with you and:

- The period required by tax and company laws and regulations; and
- As long as it is necessary for you to be able to bring a claim against us and for us to be able to defend ourselves against any legal claims. This will generally be the length of the relationship plus the length of any applicable statutory limitation period under local laws.

5. Choices About Your Information

We believe it is important to give you choices about the use of your information. We will use your information as described in this Policy (or any other event- or service-specific Privacy Policy). If we want to use your information for a purpose not described in this Policy, we will first get your consent to do so.

Marketing Communications

We will respect your wishes not to receive marketing communications. You can change your marketing preferences by contacting us at the address here. If you gave us your email address to receive marketing communications, you can opt-out at any time by using the unsubscribe links or instructions provided in our emails. We aim to comply with your opt-out request within a reasonable period of receiving communications regardless of any opt-out request. Other than to the extent set out in this Policy, we will not sell or share your information with third parties (other than our subsidiaries or affiliates) for their own promotional or marketing purposes unless you give us consent to do so and where permitted by applicable law.

6. Data Subject Rights

In certain circumstances, you have certain rights regarding your personal information. A summary of each right and how you can take steps to exercise it is set out below. To exercise any of your other rights (such as the right to access or deletion of your information), please complete the form at www.gartner.com/personaldatarequest. Such requests should include information to allow us to verify your identity and to locate your data in our systems. We may require further information from you. If you are a California resident, please refer to Section 10 below for more detailed information on your rights under California law.

Where we receive your request to exercise one of these rights, we will respond without undue delay and in any event within one month, or applicable law. This may be extended in certain circumstances, e.g., where requests are complex or numerous.

We will provide the information free of charge, except where requests are manifestly unfounded or excessive, e.g. because of their repetitive character. In these circumstances we may charge a reasonable fee or may refuse to act on the request. We will advise you of any fees prior to proceeding with a request.

Your rights and how to exercise them:

Right to access and/or correct your personal information:	You have the right to access personal information we hold about you, as to be provided with a copy of the information (in most circumstances). You also have the right to correct any information we may hold about you that is inaccurate.
Right to restrict use of your personal information:	You have the right to access personal information we hold about you, and to be provided with a copy of the information (in most circumstances). You also have the right to correct any information we may hold about you that is inaccurate. • The processing is unlawful but you want us to restrict use of the information instead of deleting it; • Where you contest the accuracy of your personal information, the restriction will apply until we have verified the accuracy or corrected your personal information; • We no longer need your personal information for the purposes of processing, but are required to keep it in connection with a legal claim; • You have exercised your right to object to the processing. The restriction will apply until we have taken steps to verify whether we have compelling legitimate grounds to continue processing.
Right to request deletion of your personal information:	You have the right to ask us to delete your personal information in most circumstances. If you want to opt-out from receiving marketing communications, the best way to do so is to allow us to retain your details with a "do not contact" tag so we know not to contact you in the future. There are also certain exceptions where we may refuse a request for erasure, for example, where the personal information is required to comply with a legal obligation or for the establishment, exercise or defense of legal claims.
Right to object to processing of your personal information:	You may object to our use of your personal information for marketing purposes. You may also object to processing of your personal information in cases where we are processing your personal information for "legitimate interests". In such cases, we will stop processing your personal information until we verify that we have compelling legitimate grounds for processing that outweigh your interests, rights, and freedoms in asking us to stop processing the data, or in limited cases where we need to continue processing the data for the establishment, exercise, or defense of legal claims.
Right to data portability:	In most cases, you have the right to receive all personal information you provided to us in a structured, commonly used, and machine readable format and to transmit this data to another data controller, where technically feasible.
Right to lodge a complaint with a supervisory authority:	If you object to our processing of your personal information, you have the right to complain to the data protection authority in the country where you live, work or where the law, where an alleged infringement of data protection laws has taken place.

7. Security

We have implemented administrative, technical, and physical security measures to help prevent unauthorized access. Despite these measures, no data transmission over the Internet can be entirely secure, and we cannot guarantee or warrant the security of any information you transmit via our websites or apps.

We make reasonable efforts to restrict access to information to only those employees, contractors, and agents who need such access in order to operate, develop, improve, or deliver our programs, products, and services.

Please note that you are responsible for maintaining the secrecy of your credentials used to access any account or service with Gartner C-level Communities, and you must report suspected unauthorized activity to us. You are responsible for activity conducted with your credentials.

8. Cookies and Similar Technologies

A cookie is a small text file which includes a unique identifier that is sent by a web server to the browser on your computer, mobile phone or any other internet enabled device when you visit an on-line site. Cookies and similar technologies are widely used to make websites work efficiently and to collect information about your online preferences. For simplicity, we refer to all these technologies as "cookies".

Some of our website pages may contain electronic images known as web beacons (also known as clear gifs, tags or pixels) that allow us to count users who have visited our pages. Web beacons collect only limited information, e.g. a cookie number, time and date of a page view, and a description of the page on which the web beacon resides. We may also carry web beacons placed by third party advertisers. These beacons do not carry any information that could directly identify you.

A cookie can't read data off your hard disk or read cookie files created by other sites. Evanta uses cookies to track user traffic patterns (as described above) and to facilitate the login process. Other third parties, such as vendors and business partners, may use cookies or other technologies on our Sites for similar purposes.

Cookies are required to use our Sites.

We also include web beacons in e-mail messages or newsletters to track whether you open the messages. We use this information to customize our services and measure the overall effectiveness of our online content, advertising campaigns, and products and services we offer through the Site. Flash cookies operate differently than browser cookies, and cookie management tools available in a web browser will not remove flash cookies. To learn more about how to manage flash cookies, you can visit the Adobe website and make changes at the Global Privacy Settings Panel.

More detailed information on how we use cookies and other web technologies can be found here.

9. Miscellaneous

9.1 Changes to this Policy

From time to time, we may change and/or update this Policy. If this Policy changes in any way, we will post an updated version on this website. We recommend you regularly review this website to ensure that you are always aware of our information practices and any changes to such. Any changes to this Policy will go into effect on posting to this page.

10. California Privacy Rights & Notice of Collection

California law requires us to provide California residents with additional information regarding how we collect, use, and share your personal information.

Categories of personal information we collect. Throughout this Policy, we discuss in detail the specific pieces of information we collect from and about users. Below are the categories of personal information we collect:

- Identifiers (such as name and title, contact details, and company name);
- Internet or other network or device activity (such as browsing history or app usage);
- Inference data about you; and
- Other information that identifies or can be reasonably associated with you.

Use of categories of personal information. We may disclose the categories of personal information identified above for our operational purposes where the use is reasonably necessary and proportionate to achieve the operational purpose for which it was collected or processed, or for another compatible operational purpose.

Sale of Personal Information. Based on the definition of "sell" under California law and under current regulatory guidance, we do not believe we engage in such activity and have not engaged in such activity in the past twelve months (including that we do not "sell" the personal information of minors under 16 years of age).

Sharing of Personal Information. We do share certain information as set forth in Sections 1 and 2 of this Policy, and allow third parties to collect certain information about your activity, for example through cookies, as explained in our Cookie Policy. To opt out of sharing that relies on cookies, please visit the Customize page to manage your cookies to disable advertising and targeting cookies. Please note that if you opt out of this sharing, you may continue to see advertising on other companies' websites from Gartner C-level Communities, but those ads may not be as relevant to you. Sharing for purposes of cookies does not include our use of cookies on our public websites and does not occur when individuals are logged in to their Gartner.com account.

Individual Rights. California law may provide you with certain rights and permit you to request the following:

- Provide you the categories of personal information we have collected or disclosed about you in the last twelve months; the categories of sources of such information; the business or commercial purpose for collecting or selling your personal information; and the categories of third parties with whom we shared personal information.
- Provide access to and/or a copy of certain information we hold about you.
- Delete certain information we have about you.

You may have the right to receive information about the financial incentives that we offer to you (if any). You also have the right to not be discriminated against (as provided for in applicable law) for exercising your rights. Certain rights may be subject to certain exceptions or limitations under applicable law. For example, we need certain types of information so that we can provide the Services to you and for compliance with applicable law. If you ask us to delete certain information, you may no longer be able to access or use the Services.

If would like to exercise any of these rights, please email us at privacy@gartner.com or send your written request to Data Protection Counsel, Americas, Gartner, 1201 Wilson Blvd., Arlington, VA. You will be required to verify your identity before we fulfill your request. You can also designate an authorized agent to make a request on your behalf. To do so, you must provide us with written authorization or a power of attorney, signed by you, for the agent to act on your behalf. You will still need to verify your identity directly with us. Subject to certain limits under California Civil Code § 1798.83, California residents may request certain information regarding our disclosure of information to third parties for their direct marketing purposes. To make such a request, please contact us as specified at the beginning of this Privacy Policy.

California Online Privacy Protection Act Notice Concerning Do Not Track Signals

Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers. We do not recognize or respond to browser-related DNT signals, as the industry is currently working toward a common approach to responding to DNT. To learn more about Do Not Track, please click here.

11. Nevada Privacy Rights

Nevada law requires us to provide certain Nevada consumers the ability to opt out of the "sale" of "personally identifiable information" as such terms are defined under Nevada law. We do not engage in such activity; however, if you are a Nevada resident who has purchased goods or services from us, you may submit a request to opt out of any potential future sales under Nevada law by emailing privacy@gartner.com. Once verified, we will maintain your request in the event our practices change.

11. Archive

Privacy Policy - April 27, 2016

Privacy Policy - May 25, 2018

Privacy Policy - April 1, 2019

Privacy Policy - December, 2019

Privacy Policy - January, 2023

Privacy Policy - January, 2024

Privacy Policy - June, 2024 1.0

Privacy Policy - February, 2025

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