

# EU-US PRIVACY SHIELD PRIVACY POLICY

## Osprey Compliance Software, LLC

Effective 09/13/2016

Last Updated 8/25/2017

### Introduction

Osprey Compliance Software, LLC (“OCS”) provides a Software-as-a-Solution (“SaaS”) compliance application hosted in ISO-27001 certified facilities on behalf of our clients that have businesses and users in EU member states and other European countries. We do not request, nor gather, nor store personal information about any individuals on our own behalf or for any purpose of our own.

OCS complies with the EU-US Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from citizens of European Union member countries and Switzerland. OCS has certified that it adheres to the [Privacy Shield Principles](#) of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability. If there is any conflict between the policies in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern.

Details of the Privacy Shield program are available at [www.privacyshield.gov](http://www.privacyshield.gov).

Osprey Compliance Software, LLC is dedicated to the protection of data collected by our clients and implements policies and procedures for its safeguard that are consistent with the laws of various countries and industry best-practices. OCS values the confidence that our clients hold in us on behalf of them, their businesses and constituent users. Therefore, we hold ourselves to the highest measure in complying with the policies set forth by Privacy Shield, the FTC and other independent, outside agencies with regards to holding EU data within the United States.

In their usage of our SaaS compliance application, each client is directly and solely responsible for the scope of personally identifiable information (“PII”) that they collect via our system.

### Nature of Data Collected

Requisite PII data that are collected by the system, for the purposes of secured and private user access, include a person’s first and last names, email address and client-defined user id. The exact format and content of the user id is the sole responsibility of each client. All of these data are stored securely within an ISO-27001 certified facility. Optional data elements may include such items as phone numbers, department information, and the like. The extent to which optional fields are populated in completely under the direction of a client.

Clients, at their sole discretion and subject to the data collection regulations of various countries, will implement disclosure forms to be completed via the web which may inquire about their users’ outside activities or other relevant information so as to ascertain if a potential conflict of interest may exist and require some form of mitigation. OCS’s system merely enables a client to define, distribute and collect data using these forms. OCS is in no manner responsible for their design or content.

### Use of Data Collected

Data collected by OCS clients using our system is wholly owned by them. OCS does not collect any data directly from client users nor will it make use of any of the data collected by its clients.

### Accountability for Onward Transfer:

OCS does not transfer data to third parties outside of its agents. OCS will obtain assurances from its agents that they will safeguard personal information consistently with this Policy such as a contract obligating the agent to provide at least the same level of protection as is required by the relevant EUUS Privacy Shield Principles, being subject to EU Directive 95/46/EC (the EU Data Protection Directive), EUUS Privacy Shield certification by the agent, or being subject to another European Commission adequacy finding. If OCS becomes aware that an agent is using or disclosing personal information in a manner contrary to this Policy, OCS will take reasonable steps to prevent or stop the use or disclosure. OCS is liable for appropriate onward transfers of personal data to third parties who do not comply with the Privacy Shield principles.

Please note that OCS may be required to disclose an individual's personal information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements.

### Access, Choice, Correction and Deletion of Personal Data

Clients' users whose data is collected by an OCS client using our system have the right under the Privacy Shield to access, correct or delete their personal data. They may do so by contacting the OCS client that collected their data or by contacting OCS at the contact information noted below:

E-mail: [privacysield@coiriskmanager.com](mailto:privacysield@coiriskmanager.com)

Mailing address: PrivacyShield %  
Osprey Compliance Software, LLC  
275 Second Ave, Suite 210  
Waltham, MA 02154

Telephone: 781-609-2312

OCS will enable our clients to offer individuals the opportunity to choose (ie opt-out) whether their personal information is (a) to be disclosed to a third party, or (b) to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual. OCS will enable our clients to provide individuals with reasonable mechanisms to exercise their choices.

### Dispute Resolution

Any questions or concerns regarding the use or disclosure of personal information should first be directed to the OCS Client that collected the user's data. If an OCS Client wishes to file a dispute, they may do so by submitting their question or concern in writing to the address listed below. OCS will investigate and attempt to resolve issues regarding privacy by principles contained in this policy.

Mailing address: PrivacyShield %  
Osprey Compliance Software, LLC  
275 Second Ave, Suite 210  
Waltham, MA 02154

If a complaint cannot be resolved between OCS and the complainant, then OCS has committed to using JAMS (<https://www.jamsadr.com/file-an-eu-us-privacy-shield-or-safe-harbor-claim>) as an alternative dispute resolution (ADR) provider. The services of JAMS are provided at no cost to you.

OCS recognizes that if a complaint cannot be resolved by OCS or JAMS, there is the possibility, under certain conditions, for the individual to invoke binding arbitration.

#### Contact Information

EU and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should be mailed to:

Mailing address: PrivacyShield %  
Osprey Compliance Software, LLC  
275 Second Ave, Suite 210  
Waltham, MA 02154

Or emailed to: [privacyshield@coiriskmanager.com](mailto:privacyshield@coiriskmanager.com)

#### Amendments

This privacy policy may be amended from time to time consistent with the requirements of the Privacy Shield. Osprey Compliance Software, LLC will post any revised policy on this website.