



## Privacy Policy

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## StarCompliance Privacy Statement

StarCompliance, Inc. offers products and services in the business-to-business market sector. As such, when StarCompliance collects information about an individual (that is, personal information), it is generally only related to that person's role at his or her company (defined below as "Buyer"), and is not related to him/her as a private person or as an individual consumer. This document describes StarCompliance's policy for handling, processing, storing, and otherwise treating personal information submitted to the Solution (defined below). "StarCompliance" means StarCompliance, Inc.

StarCompliance Customers may be referred to as "Buyer" throughout this document. Individual users of the Solution (whether employees of the Buyer organizations) collectively and individually may be referred to as "you" and "your" throughout this document.

StarCompliance supports the right to privacy, including the rights of individuals to control the dissemination and use of personal data that describes them, their personal choices, or life experiences. StarCompliance supports domestic and international laws and regulations that seek to protect the privacy rights of such individuals.

## Definitions

**Solutions** - Means the StarCompliance family of regulatory compliance software solutions:

- Personal Trading
- Insider Trading
- Gifts & Entertainment
- Political Activity
- Outside Activity
- Documents & Certifications
- Charts & Reporting

**Personal data** – Any information relating to an individual; name, address, telephone number, address, social security number, driver’s license number, and personal business transaction details.

**Processing of personal data or “processing”** – Any operation or set of operations performed on personal data, whether by automatic means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, combination, blocking, erasure or destruction.

**Third party** – Any person, partnership, corporation, public authority, government agency, or any other entity other than the individual, Buyer and the persons under the direct authority of StarCompliance, are authorized to process the data.

**Recipient** –The person, public authority, government agency, or any other entity to which personal data is disclosed, even if the recipient is a third party.

**Consent** – Any freely-given informed indication of his or her wishes by which the individual signifies his or her agreement to have his or her personal data processed, which may include disclosure.

No distinction between data, information, knowledge, or wisdom is made in this policy.

## Personal Information Handling and Privacy

### Personal Information

**"Personal Information"** is a person's name and information associated with his or her personal identity as opposed to information associated with a business. Personal Information, such as name, email, telephone number and individually used brokerage account names and numbers (required for Personal & Insider Trading Solutions only), may be required for use in some features of the Solutions. If you do not want to provide Personal Information to StarCompliance or wish to have StarCompliance remove your Personal Information from the Solutions, please contact your employer's StarCompliance account administrator to find out if there is an optional way for you to perform the applicable business function without submitting Personal Information.

You should submit only publicly available, business contact information. Information submitted to the Solution may not include Sensitive Personal Information, with the exception of brokerage account names and numbers (required for Personal & Insider Trading Solutions only).

**"Sensitive Personal Information"** means government identification numbers or financial account numbers associated with individual persons (e.g. U.S. Social Security numbers, driver's license numbers, or personal credit card or banking account numbers), and medical records or health care claim information associated with individuals, including claims for payment or reimbursement for any type of medical care for an individual.

### Use of Personal Information by StarCompliance

StarCompliance will treat Personal Information as confidential and will use it only to: facilitate operation of the Solution and its related services; enhance use of the Solution and its related web pages; perform internal tracking and Solution improvement; enable the Buyer to contact you; process requested transactions through the Solution (such as the Solutions pre-clearance and attestation functionality); and analyze the volume and history of a company's Solution usage.

### Use of Cookies

Some of our Solution areas utilize cookie technology for the above purposes. If you configure your browser to reject cookies from the StarCompliance Solutions, you will not be able to access the Solutions. StarCompliance does not link the information we store in cookies to Personal Information you submit while using the Solutions except as necessary to perform web site security, service functionality and usage analytics. StarCompliance does not place any third party advertising tracking cookies on your computer during your use of the StarCompliance Solutions. The web pages you access when using the StarCompliance Solutions do not respond to "do not track" signals sent by your browser.

## Visibility of Personal Information within a Solution

The StarCompliance Solutions are confined to a single-tenant model. Each Buyer receives dedicated Solutions; each Solution contains only that Buyer's employee personal information. The Solutions are administered by the Buyer's administrative teams (E.g. compliance office). The Solutions provide role-based and data visibility functionality to prevent un-authorized Buyer employees from viewing employee transactional data.

## Consent

By submitting Personal Information to the Solutions, you are consenting to StarCompliance's collection, processing, storage, and use of that information in accordance with this policy. Before providing Personal Information to the Solutions the Buyer must obtain that individual's consent for the collection, transfer, processing, and use of that information in accordance with this policy. As a user of the Solutions, and subject to the roles you hold and your notification settings, you may be required to receive certain administrative notices from the StarCompliance Solutions.

## Transfer

StarCompliance, Inc. maintains operations offices and hosting facilities in both the United States and United Kingdom. Buyers located in the European Union will utilize our United Kingdom data centers, while Buyer's from the rest of the world; all countries outside the European Union, will utilize our United States data centers. Upon written request the Buyer may be hosted in their preferred data center location. By submitting data to the Solutions, you consent to having such data transferred to the Solutions operation location selected by StarCompliance.

## Correcting Account Information (Exercising Your Right to Access Personal Information)

You have a right to access and modify your Personal Information and to delete your Personal Information, subject to constraints identified below. To exercise these rights, StarCompliance has procedures to allow you to update Personal Information in a timely manner. In the Solutions, the administrative contact for your company can directly change most contact information by logging on to the Solutions and managing your account profile directly. In the StarCompliance Solutions, each individual user can self-administer his/her own user account details.

Deletion of your Personal Information may require approval by your employer (e.g. expense report data) and may require StarCompliance assistance. Some requests to delete data must be made to StarCompliance through the administrative contact for your company.

StarCompliance may refuse to give access to the Solutions for legitimate reasons including regulatory requirements, a legal dispute, or security concerns. If you are unable to correct, update, or delete your personal information due to the fact that you are no longer an employee of the Buyer that is the account holder, or your account has been terminated, you may contact StarCompliance.

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## Disclosure by StarCompliance to Third Parties

StarCompliance may provide third parties with personal data processed on its systems for generally accepted business purposes such as court orders, subpoenas, employment verification, governmental licensing, underwriting, and other reasons. All recipients of such information must definitively identify themselves, certify in writing the legal and customary purposes for which the information is sought and certify that the personal data will be used for no other purposes.

All disclosures to government agencies and other third parties must be preceded by written or other notice sent to the individual. A blanket, one-time approval of such disclosures is sufficient. Sufficient time must be provided between the receipt of such notice to the individual and the actual disclosure to the third party to permit the individual to object should he or she so elect.

## Processing Confidentiality and Security

Transfers of private information to another country, no matter what technology is employed, must not take place unless prior approval of the Information Security Manager at the Buyer has been obtained. An exception is made in those cases where the individual is, was, or will be located in the destination country, or when the individual has specifically requested such a transfer.

StarCompliance does not use externally-meaningful identifiers as its own internal individual account numbers. For example, to prevent identity theft, StarCompliance customer user account numbers must never be equivalent to social security numbers, driver's license numbers, or other identifiers that might be used in an unauthorized fashion by a third party.

StarCompliance uses industry standard security technology and organizational measures to protect Personal Information from unauthorized disclosure. StarCompliance takes steps to appropriately safeguard personal information using recommended industry encryption methods for both data in transit and data at rest. StarCompliance's services are designed so that these categories of information can only be viewed from within the Solutions. Using role-based and data visibility features, the Buyer can further limit access to only those users who need to see such information.

During the building, testing, enhancing, and maintaining of the Solutions, developers must not have access to actual user personal data. Instead, they must use fictional or sanitized personal data that preserves the essential characteristics of the data, but that does not relate to identifiable individuals. IN emergency situations where processing with actual personal data is required, use of such information is permitted under strict security procedures defined by information security policy.

## Data Retention

StarCompliance will retain Personal Information in active databases for varying lengths of time depending upon the type of data, and applicable law. Consistent with StarCompliance's backup and storage procedures and due to the close integration of data with the Solutions, Personal Information might be stored by StarCompliance in backup logs and files for the duration necessary for legal requirements or the purposes described in this policy. However, StarCompliance makes no commitment to indefinitely store such data.





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## Monitoring of Internal Activities

In general terms, StarCompliance does not engage in blanket monitoring of internal communications. It does, however, reserve the right at any time to monitor access, retrieve, read, or disclose internal communications when a legitimate business need exists that cannot be satisfied by other means, the involved individual is unavailable and timing is critical to a business activity, there is reasonable cause to suspect criminal activity or policy violation, or monitoring is required by law, regulation, or third-party agreement.

At any time and without prior notice, StarCompliance management reserves the right to examine archived electronic mail, personal computer file directories, hard disk drive files, and other information stored on StarCompliance information processing systems. This information may include Personal Information. Such examinations are typically performed to assure compliance with internal policies, support the performance of internal investigations, and assist with the management of StarCompliance information processing systems.

## Changes to this Policy

From time to time StarCompliance will need to make changes to this policy. Some of the changes will be in response to changes in applicable laws and regulations. In addition, as StarCompliance adds new features and new services to the Solutions, StarCompliance will continue to handle Personal Information consistently with this policy, but some changes or clarifications may be required.

If StarCompliance seeks to make a material change to StarCompliance's policy to allow use of Personal Information for a new, legitimate business purpose, StarCompliance will document the change to this policy, note the date of the last update at the end of the policy, and publish the policy on our secure customer portal. You are encouraged to check this policy occasionally to stay informed of any changes in our policies and procedures regarding Personal Information. For substantial and material changes to this policy, StarCompliance will use reasonable efforts to provide notification to all affected users and suggest that such users review the updated policy.

## Privacy Shield

StarCompliance complies with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States, respectively. For purposes of enforcing compliance with the Privacy Shield, StarCompliance is subject to the investigatory and enforcement authority of the US Federal Trade Commission. For more information about the Privacy Shield, see the US Department of Commerce's Privacy Shield website located at: <https://www.privacyshield.gov>.

To review StarCompliance representation on the Privacy Shield list, see the US Department of Commerce's Privacy Shield self-certification list located at: <https://www.privacyshield.gov/list>. Conflict between the terms in this Privacy Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, please visit: <https://www.privacyshield.gov/>.

StarCompliance 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.

### Binding Arbitration

You may have the option to select binding arbitration for the resolution of your complaint under certain circumstances, provided you have taken the following steps:

- raised your complaint directly with StarCompliance and provided us the opportunity to resolve the issue;
- made use of the independent dispute resolution mechanism identified above;
- and, raised the issue through the relevant data protection authority and allowed the US Department of Commerce an opportunity to resolve the complaint at no cost to you.

For more information on binding arbitration, see US Department of Commerce's Privacy Shield Framework: Annex I (Binding Arbitration).

### Onward Transfer

In the context of an onward transfer, a StarCompliance takes responsibility for the processing of personal information it receives under the Privacy Shield and subsequently transfers to a third party acting as an agent on its behalf. StarCompliance shall remain liable under the Principles if its agent processes such personal information in a manner inconsistent with the Principles, unless the organization proves that it is not responsible for the event giving rise to the damage.

### Complaints

In compliance with the US-EU and Swiss-US Privacy Shield Principles, StarCompliance commits to resolve complaints about your privacy and our collection or use of your personal information. European Union or Swiss individuals with inquiries or complaints regarding this privacy policy should first contact StarCompliance at:

**T:** 888.791.8526  
**E:** [privacy@starcompliance.com](mailto:privacy@starcompliance.com)  
**W:** [www.starcompliance.com](http://www.starcompliance.com)

Privacy Officer,  
451 Hungerford Drive,  
Suite 515,  
Rockville,  
MD 20850,  
USA



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StarCompliance has further committed to refer unresolved privacy complaints under the EU-US and Swiss-US Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <http://www.bbb.org/EU-privacyshield/for-eu-consumers> for more information and to file a complaint.

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#### Contact Us

If you have any questions or queries, please contact StarCompliance with the details below:

**T:** 888.791.8526

**E:** [privacy@starcompliance.com](mailto:privacy@starcompliance.com)

**W:** [www.starcompliance.com](http://www.starcompliance.com)

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