



VeraSafe Privacy Training Portal Privacy Notice

Last Updated: January 14, 2020

Introduction and Scope

VeraSafe, LLC (“us”, “we,” “our,” or “VeraSafe”) takes the protection of personally identifiable information (“Personal Data”) very seriously. This privacy notice (hereinafter, the “Notice”) addresses data subjects whose Personal Data VeraSafe may receive or otherwise process in our hosted learning management platform, the “Platform”. This Notice does not apply to Personal Data collected by other means, including Personal Data we receive directly from our website(s) or the Personal Data of the employees or contractors of VeraSafe.

Within the scope of this Notice, VeraSafe acts as an agent, also known as a data processor for the Personal Data we process for our customers in the course of providing our Platform. The organization or natural person who is licensed by VeraSafe to use the Platform is the data controller (“Training Administrator”).

How We Receive Personal Data

Training Administrators typically submit your Personal Data to the Platform. We also automatically collect your IP address when you participate in training modules or otherwise access the Platform.

Basis of Processing

Within the scope of this Notice, we process Personal Data based on the instructions of the Training Administrators.

Categories of Personal Data

The Platform is designed to process the following types of Personal Data:

- Biographical information, such as first name and last name;
- Professional information, such as job title and position; and
- Contact details, such as an email address.

However, the Platform offers user-customizable fields, which allow Training Administrators to process any category of Personal Data.

Purposes of Processing

We may process your Personal Data for the purposes of:

- providing the Platform and its features to the Training Administrators, at their instruction;
- processing Personal Data on behalf of the Training Administrators;



- responding to your questions or requests; and
- providing aggregate information regarding our Platform to prospective customers.

Data Retention

Personal Data that is processed in the Platform is retained for as long as is necessary for us to perform our obligations under the contract entered into between the Training Administrator and VeraSafe. When such contract expires or is otherwise terminated, all Personal Data controlled by that Training Administrator, and processed within the Platform, will be deleted from the Platform within 90 days, unless otherwise required by law. Please note that we keep backup copies of our databases as part of our disaster recovery/business continuity plans, and it may not be reasonably possible to delete data from such backups.

Sharing of Personal Data with Third Parties

We may disclose your Personal Data to our subsidiaries and affiliates, as well as our service providers. Our service providers process Personal Data on our behalf and agree to use the Personal Data only to assist us in providing our services, or as required by law. Our service providers may provide:

- application hosting services;
- cloud storage services;
- email software; and
- maintenance, enhancement, or added functionality to the Platform.

Some of these third parties may be located outside of the United States. However, before transferring your Personal Data to these third parties, we require the third party to maintain at least the same level of privacy and security for your Personal Data that we do. We remain liable for the protection of your Personal Data within the scope of our Privacy Shield certification (as defined below) that we transfer to third parties, except to the extent that we are not responsible for the event that leads to any unauthorized or improper processing.

Some of these third parties may be located outside of the European Union or the European Economic Area. In some cases, the European Commission may not have determined that those countries' data protection laws provide a level of protection equivalent to European Union law. We will only transfer your Personal Data to third parties in these countries when there are appropriate safeguards in place. These may include the European-Commission-approved standard contractual data protection clauses.

Other Disclosures of Your Personal Data

We may disclose your Personal Data to the extent required by law, or if we have a good-faith belief that we need to disclose it in order to comply with official investigations or legal proceedings (whether initiated by governmental/law enforcement officials, or private parties). We may also disclose your Personal Data if we sell or transfer all or some of our company's business interests, assets, or both, or in connection with a corporate restructuring. Finally, we may disclose your Personal Data to our subsidiaries or affiliates if such a disclosure is necessary for business purposes, as described in the section above.



We reserve the right to use, transfer, sell, and share aggregated, anonymous data for any legal business purpose. Such data does not include any Personal Data. The purposes may include analyzing usage trends or seeking compatible advertisers, sponsors, and customers.

If we have to disclose your Personal Data to governmental/law enforcement officials, we may not be able to ensure that those officials will maintain the privacy and security of your Personal Data.

Cookies

A “cookie” is a small file stored on your device that contains information about your device. We may use cookies to provide Platform functionality, authentication (session management), usage analytics (web analytics), and to remember your settings, and generally improve our Platform.

We use session and persistent cookies. Session cookies are deleted when you close your browser. Persistent cookies may remain even after you close your browser, but always have an expiration date. Most of the cookies placed on your device through our Platform are first-party cookies, since they are placed directly by us. Other parties, such as Google, may also set their own (third-party) cookies through our Platform. Please refer to the policies of these third parties to learn more about the way in which they collect and process information about you.

If you would prefer not to accept cookies, you can change the setup of your browser to reject all or some cookies. Note, if you reject certain cookies, you may not be able to use all of our Services’ features. For more information, please visit <https://www.aboutcookies.org/>.

Data Integrity & Security

We have implemented and will maintain technical, administrative, and physical measures that are reasonably designed to help protect Personal Data from unauthorized processing. This includes unauthorized access, disclosure, alteration, or destruction.

Access, Review & Opting Out

If we process your Personal Data, you may have the right to request access to (or to update, correct, or delete) such Personal Data. Requests to exercise these rights should be sent directly to the Training Administrator who provided your Personal Data to us. VeraSafe has limited rights to access and modify the Personal Data submitted to us by Training Administrators. Therefore, if you contact VeraSafe with such a request, please provide the name of the Training Administrator who submitted your Personal Data to us. We will forward your request to that Training Administrator, and VeraSafe will provide any needed assistance to the Training Administrator as they respond to your request.



Privacy of Children

The Platform is not directed at, nor intended for use by, children under the age of 13 and children under the age of 13 are prohibited from using the Platform. If you believe that Personal Data pertaining to your under-13-year-old child has been submitted to the Platform, and you would like to exercise your rights with regards to such Personal Data, please contact the Training Administrator who submitted the Personal Data to the Platform.

EU-U.S. and Swiss-U.S. Privacy Shield Framework

For Personal Data processed in the scope of this Notice, VeraSafe complies with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework (the “Privacy Shield”), as adopted and set forth by the U.S. Department of Commerce regarding the processing of Personal Data transferred from the European Union, the European Economic Area, the United Kingdom, or Switzerland to the United States, or otherwise received in reliance on the Privacy Shield. We commit to adhere to the Privacy Shield Principles and have certified our adherence to the Department of Commerce.

To learn more about the Privacy Shield, and to view our certification, please visit <https://www.privacyshield.gov> and <https://www.privacyshield.gov/list>, respectively.

Changes to This Notice

We may update this Notice from time to time by posting a new version on this web page. When we make a material change to the Notice, we will update the “Last Updated” date at the top of this page to reflect the effective date of the most recent version of the Notice.

Contact & Dispute Resolution Process

If you have a complaint, dispute, or question regarding this Notice or our processing of your data, please write to our Internal Legal Department by email at privacy_notice@verasafe.com or by postal mail at:

Attn: Internal Legal Department
VeraSafe, LLC
22 Essex Way, #8203
Essex, VT 05451
USA

You may also contact us by phone at our customer support number 1-888-376-1079 (or if calling from outside the U.S., dial +1-617-398-7067).

We will respond to legitimate inquiries within 30 days of receipt.



Dispute Resolution

If a complaint or dispute cannot be resolved through our internal process, we have also agreed to cooperate with the EU data protection authorities and the Swiss Federal Data Protection and Information Commissioner and to participate in the dispute resolution procedures of the panel established by such data protection authorities.

Binding Arbitration

If your dispute or complaint can't be resolved by us, you may have the right to require that we enter into binding arbitration with you under the Privacy Shield's "Recourse, Enforcement and Liability Principle" and Annex I of the Privacy Shield.

Regulatory Oversight

VeraSafe is subject to the investigatory and enforcement powers of the United States Federal Trade Commission.