

# Privacy Statement

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This privacy statement applies to [navexglobal.com](http://navexglobal.com) and NAVEX Global websites, services and products that collect data and display these terms. It does not apply to any NAVEX Global site, service or product that does not display or link to this statement or that contains its own privacy statement.

NAVEX Global, Inc. (“NAVEX Global”, formerly Global Compliance Services, Inc., EthicsPoint, Inc., ELT, Inc., The Network, Inc. and Policy Technologies International, Inc.) and its affiliate, GCS Compliance Services Europe, Limited, are committed to protecting your privacy in a variety of ways including using industry accepted security measures to protect against loss, misuse and alteration of data contained in our systems. This Privacy Statement is designed to describe how we secure and maintain our customers' and visitors' personal information when collected on sites which link to this Privacy Statement. This includes [navexglobal.com](http://navexglobal.com), [ethicspoint.com](http://ethicspoint.com), [elt.com](http://elt.com), [globalcompliance.com](http://globalcompliance.com), [alertline.com](http://alertline.com) and [policytech.com](http://policytech.com). Any information given to us will never be sold, rented, traded, shared or leased other than as outlined in this Policy.

NAVEX Global does not publish text, images, or multimedia content that portray nudity, foul language, violence or other information not suitable for children. Web sites maintained by NAVEX Global are not directed to children under the age of 13. NAVEX Global will not knowingly collect or maintain personal data from or about anyone under 13. NAVEX Global is committed to complying with privacy laws to which it is subject and adhering to the highest industry standards for privacy.

NAVEX Global is not responsible for the content of any customer data saved to any NAVEX Global system by Hotline/Ethicsline reporters or customer company representatives. Our responsibility is limited to collecting and securing that information in accordance with the terms of this Privacy Statement, our contracts with customers and applicable law.

## **COLLECTION AND USE**

### **Collection and Use of Information**

NAVEX Global collects different kinds of information in order to provide you with the best products and services and to operate effectively. Some of this information is provided directly by you, while other information may be provided by your employer in connection with use of our products and services. We may also gather information by observing how you interact with our website, products and services.

## **What information we collect**

**Registration:** When you, or your organization, sign up to use our sites or services, or you sign up to attend a webinar or get additional information about our products and services, we may receive certain necessary information such as your name, job title and contact information such as email address, phone number and address.

**Licensed Users:** To access some of our products and services you may be required to provide us specific information (such as your login credentials) that allows us to verify your identity before accessing certain data we host. In addition, we may use tools and other tracking software within our applications to collection information related to the pages and areas within pages you visit. This identity verification information is kept secure on our servers and is only used to assist you in accessing your account or report; this information is not released outside of the relevant NAVEX Global system unless specifically authorized. De-identified information on how you use our services may be shared with trusted third parties to enable us to provide improved functionality and other enhancements within our applications but it will not include any personal data.

**Hotline/EthicsLine Reporters:** No directly identifying information is automatically collected from reporters using NAVEX Global applications. Certain directly identifying information, such as name and e-mail address, is stored only when a reporter voluntarily gives this information for use by a customer company. Other information, such as IP address, may be automatically collected from reporters using NAVEX Global applications. In addition, to access a report you may have submitted, you may be required to provide us with specific information (such as a report key and personal identification number) that allows us to verify your identity before accessing information you may have submitted. This identity verification information is kept secure on our servers and is only used to assist you in accessing your report unless specifically authorized or legally required.

## **How we collect information**

NAVEX Global gathers information about how you use our sites and services in a number of ways, including:

Web forms, such as when you type information into a registration form

Technologies like cookies (please see Cookies for more information about this technology)

Web logging, which enables us to collect the standard information your browser sends to every web site you visit such as your IP address, browser type and language, and the site you came from as well as pages you visit and links you click on within our site

For licensed users of our applications, we may use tools and other tracking software within our applications to collect information related to the pages and areas within pages you visit, which enables us to provide improved functionality and other enhancements within our applications.

### **How we use Personal Information**

NAVEX Global uses the information we collect to operate and improve our products and services, to respond to requests about promotions or products and services offered and to protect and secure the integrity of our systems and data hosted, as more fully set forth below.

**Visitors:** When NAVEX Global collects personal data from visitors to our sites, the information collected from opt-in users is used only to respond to visitors' requests. In instances where opt-in participants' requests relate to NAVEX Global partners, we will provide personal data only to respond to that request. NAVEX Global does not sell, rent, lease, trade or share visitors' personal data other than as outlined in this Policy. When you provide us with your personal data or otherwise choose to sign up to receive email communications from us, we will use that information to send those communications to you. Individuals may "opt-in" and "opt-out" of receiving e-mail communications through selections available on e-mails received. For participants of our web seminars, the only personal data we share is web seminar registration information and it is only shared with our web seminar presenters to provide this service. They are not permitted to use this information for their own marketing purposes.

**Licensed Users of Products and Services:** Personal data such as name, contact information, username and password is stored in our database for access to and use of certain software applications. This information is kept secure, is used to assist you in accessing your account and is not released outside of the NAVEX Global system unless specifically authorized or required by law. We may share de-identified information in relation to your use of our applications with trusted third parties, enabling NAVEX Global to provide you with improved functionality and other enhancements.

**Hotline/EthicsLine Reporters:** No directly identifiable information is automatically collected from reporters submitting a case. Directly identifying information, such as name and e-mail address, is collected and stored only when a reporter voluntarily gives this information. Other information, such as IP address, may be automatically collected from reporters using NAVEX Global applications. This automatically collected information may be used to protect and secure the integrity of

our systems and data we host, and may be shared with law enforcement to enforce our rights or as otherwise required by applicable law.

Please note that where personal data is collected within the software applications we offer, we do so on behalf of customer organizations and those customer organizations manage the data in accordance with their own internal policies and procedures. Any questions related to how that customer organization may process, use or share your information should be directed to that customer organization by contacting them directly. We will respond to any requests from the customer organization to remove or edit data within a reasonable timeframe.

## **ACCESS**

### **Access to Personal Information**

NAVEX Global acknowledges that you may have the right to access your personal information. However, in most cases, NAVEX Global has no direct relationship with the individuals whose personal data it processes because it is collecting this information on behalf of its customer. Any individual who seeks access to their personal information, or who seeks to correct, amend, or delete inaccurate data should direct their enquiry to our customer (the data controller). Where NAVEX Global is only processing personal information on behalf of its customers, enquiries made directly to NAVEX Global will be forwarded to our customer for response. NAVEX Global will respond to instructions from our customer pertaining to such access/correction/deletion requests within a reasonable timeframe.

Where NAVEX Global has a direct relationship with an individual whose personal data it processes and where that individual is located within the European Union, Switzerland or the United Kingdom, you may have the right to access your information. You may also request information about: the purpose of the processing; the categories of personal data concerned; who (outside NAVEX Global) we may have shared your personal data with; what the source of the information was (if you didn't provide it directly to NAVEX Global); and how long it will be stored. You have a right request that personal data stored by NAVEX Global be corrected where that data is inaccurate. You may also request that NAVEX Global erase that data or cease processing it, subject to certain exceptions. You may also request that NAVEX Global stop using your data for direct marketing purposes. In many countries, you have a right to lodge a complaint with the appropriate data protection authority if you have concerns about how NAVEX Global processes your personal data. Upon your request, and where it is technically

feasible, NAVEX Global will provide you with a copy of your personal data or transmit it directly to another controller.

To make a request please contact us at [privacy@navexglobal.com](mailto:privacy@navexglobal.com) with “Personal Information Request” in the subject line, and provide us with full details in relation to your request, including your contact information and any other detail you feel is relevant.

NAVEX Global shall provide a response to an access request within 30 days of receiving such request.

We will retain your information for as long as your account is active or as needed to provide services to your organization. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## **COOKIES, GIFS & LOG FILES**

### **Use of Cookie, Clear Gif and Log File Technology**

Technologies such as: cookies, beacons, tags, and scripts are used by us and our tracking utility partners. These technologies are used in analyzing trends, administering the site, tracking users’ movements around the site and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

A “cookie” is a small text file that is stored on a user’s computer.

NAVEX Global utilizes Cookie technology on our sites for purposes of Website traffic analysis such as the time/date of the visit, the time/date of last visit, the page viewed, the referring site, and other data. NAVEX Global also tracks click behavior in the e-mails it sends out. This data is used to update specific user-profile information, ascertain the areas of most interest to opt-in e-mail recipients, and to personalize e-mail messages to them.

We also use session ID cookies for access to products and services by our licensed users and reporters. These session Cookies are used to make it easier to navigate our site, products and services. A session ID Cookie expires when your browser is closed. If you reject Cookies, you may still use portions of our site, but your ability to use some areas of our site, products or services, may be limited.

In limited circumstances, and with appropriate notice to licensed users, we will use persistent Cookies (Cookies that do not expire when your browser is closed). In these situations, licensed users are required to consent to the placement of a Cookie prior to

it being activated and consent may be withdrawn at any time by simply accessing the form and un-ticking the box giving NAVEX Global permission to store the information. Any persistent Cookie that is unused for 30 days will automatically expire.

As is true of most Web sites, we gather certain information automatically and store it in log files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data. We use this information to analyze trends, to administer the site, to track users' movements around the site and to gather demographic information about our user base as a whole.

In addition, Session Variables may be used temporarily in your system cache to create ease-of-use during your transaction with our site. Examples of such information are automatically-produced alphanumeric numbers held during your session on our site to facilitate page-to-page transactions. We only store name, e-mail, phone, address, company name or any other identifying information for licensed users; no information is stored for others unless otherwise stated in this policy.

We and our third party tracking-utility partners employ a software technology called clear gifs (a.k.a. Web Beacons/Web Bugs), that help us better manage content on our site by informing us what content is effective. Clear gifs are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of Web users. In contrast to cookies, which are stored on a user's computer hard drive, clear gifs are embedded invisibly on Web pages and are about the size of the period at the end of this sentence.

We use clear gifs in our HTML-based emails to let us know which emails have been opened by recipients. This allows us to gauge the effectiveness of certain communications and the effectiveness of our marketing campaigns.

## **LOCAL STORAGE OBJECTS**

### **Local Storage Objects (Flash/HTML 5)**

We use Local Storage Objects (LSOs) such as HTML 5 to store content and preferences. Third parties with whom we partner to provide certain features on our site to display advertising based upon your web browsing activity use LSOs such as HTML 5 to collect and store information. Various browsers may offer their own management tools for removing HTML 5 LSOs. [Click here to manage Flash cookies.](#)

## **ADVERTISING**

### **Advertising**

We partner with a third party ad network to either display advertising on our Web site or to manage our advertising on other sites. Our ad network partner uses cookies and Web beacons to collect non-personal information about your activities on this and other Web sites to provide you targeted advertising based upon your interests. If you wish to not have this information used for the purpose of serving you targeted ads, you may opt-out by clicking here [or if located in the European Union click here]. Please note this does not opt you out of being served advertising. You will continue to receive generic ads.

## **SECURE COMMUNICATIONS**

### **Secure Communications**

NAVEX Global will take reasonable precautions to protect personal information in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction.

For licensed users and reporters, communications between the NAVEX Global site and a user's web browser are accomplished using, at a minimum, 128 bit SSL encryption and various third party security certificates to protect confidential data. NAVEX Global does not allow users to transfer or receive confidential information unless they are using a validated 128 bit (or greater) encrypted session.

We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

If you have any questions about security on our Web site, you can e-mail us at [itsecurity@navexglobal.com](mailto:itsecurity@navexglobal.com) with "Questions about Web site Security" in the subject line

## **USE OF THIRD PARTIES**

### **Use of Third Party Services**

NAVEX Global contracts with select third parties for Web-based services that include e-mail delivery and content streaming, that may collect certain visitor data including IP address and pages visited. These third parties may only use directly identifying data, for

example, e-mail addresses, for the service requested and not for their own marketing purposes unless you separately consent to receiving such marketing under the terms provided by that third party.

NAVEX Global also contracts with select third parties in connection with the delivery of services to our customers. These third parties may not use any directly identifying data other than to provide the specific contracted services.

## **BLOGS AND FORUMS**

### **Public Forums**

Our Web site offers publicly accessible blogs or community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. To request removal of your personal information from our blog or community forum, contact us at [policyshare@navexglobal.com](mailto:policyshare@navexglobal.com). In some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why.

If you choose to comment on our blog, you will be required to login to our third party vendors site to do so. Any information you choose to submit within this section of the site will be collected and used by our vendor and is subject to their privacy policy. Please contact them directly should you have any questions or concerns regarding your posting.

## **OTHER SITES**

### **Links to Other Sites**

Our Site includes links to other Web sites whose privacy practices may differ from those of NAVEX Global. If you submit personal information to any of those sites, your information is governed by their privacy statements. We encourage you to carefully read the privacy statement of any Web site you visit.

## **SOCIAL MEDIA & WIDGETS**

## **Social Media Features and Widgets**

Our Web site includes Social Media Features, such as the Facebook Like button and Widgets, such as the Share this button or interactive mini-programs that run on our site. These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our Site. Your interactions with these Features are governed by the privacy policy of the company providing it.

## **TERMS**

### **Terms**

No company other than NAVEX Global is allowed to access information stored on our servers, unless expressly authorized by NAVEX Global. Unauthorized access to this information is a violation of the law. NAVEX Global has placed security measures and firewalls on all network servers in an attempt to prevent outside parties from accessing private information. In the event of a breach of security, NAVEX Global will press charges to the fullest extent possible against those parties illegally accessing information on our servers.

## **PRIVACY SHIELD**

### **EU-U.S. Privacy Shield and Swiss- U.S. Privacy Shield**

NAVEX Global (and its subsidiary company, The Network, Inc.) participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework and the Swiss- U.S. Privacy Shield Framework. NAVEX Global is committed to subjecting all personal data received from European Union (EU) member countries and Switzerland, respectively, in reliance on each Privacy Shield Framework, to the Frameworks' applicable Principles. To learn more about the Privacy Shield Frameworks, and to view our certification, visit the U.S. Department of Commerce's Privacy Shield List.

NAVEX Global is responsible for the processing of personal data it receives, under each Privacy Shield Framework, and subsequently transfers to a third party acting as an agent on its behalf. NAVEX Global complies with the Privacy Shield Principles for all onward

transfers of personal data from the EU and Switzerland, including the onward transfer liability provisions.

With respect to personal data received or transferred pursuant to the Privacy Shield Frameworks, NAVEX Global is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, NAVEX Global may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Under certain conditions, more fully described on the Privacy Shield website, you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

## **LEGAL DISCLOSURES**

### **Disclosure Pursuant to Judicial or Government Subpoenas, Warrants or Orders**

In certain situations, NAVEX Global may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

We reserve the right to disclose your personal data as required by law and when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, or legal process served on us.

## **BUSINESS TRANSFER**

### **Business Transfer**

In the event NAVEX Global goes through a business transition, such as a merger, acquisition by another company, or sale of all or a portion of its assets, your personal data will likely be among the assets transferred. You will be notified via prominent notice on our Web site for 30 days of any such change in ownership or control of your personal information.

## **BREACH OF PRIVACY POLICY**

## **Breach of Privacy Policy**

If you have received unwanted, unsolicited e-mail sent by NAVEX Global or from any NAVEX Global system or purporting to be sent via NAVEX Global, please forward a copy of that e-mail with your comments to [info@navexglobal.com](mailto:info@navexglobal.com) for review.

If you have questions or complaints regarding our privacy statement or practices, please contact us at [privacy@navexglobal.com](mailto:privacy@navexglobal.com) with "Privacy Enquiry" in the subject line and provide detail on your question or complaint so that we may adequately respond. If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>

Please see below for fax and postal mail information.

### Contact Information

Questions or comments regarding this Policy should be submitted to NAVEX Global by mail or e-mail as follows:

NAVEX Global, Inc.  
Attention: Privacy Officer  
5500 Meadows Road  
Suite 500  
Lake Oswego, OR 97035  
USA  
[privacy@navexglobal.com](mailto:privacy@navexglobal.com)

## **CHANGES**

### **Changes to This Privacy Statement**

Any updates or changes to our privacy statement will be posted to this privacy statement, the home page, and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. We reserve the right to modify this privacy statement at any time, so please review it frequently. If we make material changes to this policy, we will notify you here, by e-mail, or by means of a notice on our home page prior to the change becoming effective.

