

## **SCOUT EXCHANGE'S EU-US PRIVACY SHIELD NOTICE**

Updated: February 9,2022

Scout Exchange complies with the Privacy Shield Frameworks as set forth by the US Department of Commerce regarding the collection, use and retention of personal information transferred from the United Kingdom, and European Union member countries to the United States. Scout Exchange has certified that it adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, Recourse, Enforcement and Liability. If there is a conflict between this notice and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about Privacy Shield and to view Scout Exchange's certification please visit <https://www.privacyshield.gov/list>.

This Privacy Shield Notice supplements the Scout Exchange's Privacy Notice. Unless specifically defined in this Privacy Shield Notice, the terms in this Privacy Shield Notice have the same meaning as in our Scout Exchange's Privacy Notice. In case of conflict between this Privacy Shield Notice and the Principles, the Principles will govern.

### **DATA PROCESSED AND PURPOSE**

We obtain and process Personal Information from the European Union and United Kingdom in different capacities:

As a data processor, we obtain and process EEA Personal Information on behalf of and under the instructions of our customers in connection with the Scout Services ("Services"). In this capacity, our customers decide what Personal Information they submit, and we process Personal Information at our customers' instructions and pursuant to the Services agreements with those customers. We may access this information to provide the Services, to prevent, correct, or address service or technical problems, to respond to customer support matters in response to our customers' instructions, or to fulfill our contracts with our customers. This information is referred to as "Customer Data" in the Scout Exchange Privacy Notice.

As a data controller, we may collect and process EEA Personal Information directly from individuals, either via our publicly available websites, including [www.goscoutgo.com](http://www.goscoutgo.com) and [skill.com](http://skill.com) or in connection with our customer, partner, and vendor relationships. In this capacity, we process personal information in order to run our business and provide the Services to our customers.

### **DATA DISCLOSURE AND SHARING**

We do not sell or rent personal information to third parties who are not affiliated with Scout Exchange. We will share personal information with third parties only in the ways that are described in The Scout Exchange Privacy Notice.

Scout may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

For more information on how we use and share personal data please see our [Privacy Notice](#)

**LIABILITY FOR ONWARD TRANSFER.** Scout Exchange is responsible for the processing of personal data it receives under the Privacy Shield and subsequently transfers to a third party agent acting on its behalf. Scout Exchange shall remain liable under the Privacy Shield Principles if its agents that it engages to process such personal information do so in a manner inconsistent with the Principles, unless Scout Exchange proves that it is not responsible for the event giving rise to the damage.

### **CHOICES**

When providing the Services, our customers choose the types of Personal Information that they submit to us and the purposes of the processing. Accordingly, our customers are responsible for providing notice to individuals.

In the event Scout Exchange is acting as a data controller, Scout Exchange will provide individuals with choices. To the extent Personal Information is (i) to be used for a purpose that is materially different from the purposes for which the Personal Information was originally collected or subsequently authorized, or (ii) transferred to a third party acting as a data controller, individuals will be given, where practical and appropriate, an opportunity to opt-out of having their Personal Information so used or transferred where it involves non-sensitive information. Where such use or transfer involves sensitive information, individuals must opt-in before such use or transfer.

### **RIGHT OF ACCESS**

Individuals whose data is subject to this Privacy Shield Notice and whose data is submitted directly to us have rights to access Personal Information and may request corrections, deletions, or additions where the Personal Information is inaccurate or has been processed in violation of the Principles. We may limit or deny access to Personal Information where providing such access is unreasonably burdensome or expensive under the circumstances, or as otherwise permitted by the Principles. These individuals may request access to their Personal Information by contacting us at [privacy@goscoutgo.com](mailto:privacy@goscoutgo.com)

When providing our Services, we only process and disclose the Personal Information as specified in our Services agreements with customers. Our customers control how Personal Information is disclosed to us and processed, and how it can be modified. Accordingly, individuals that wish to request access, or to limit use or disclosure of Personal Information that was provided to one of our customers, should contact the company to which they submitted their Personal Information and that use our Services. We will support our customers in responding to these requests.

### **DISPUTE RESOLUTION AND ARBITRATION**

In case of disputes, individuals whose data is subject to this Privacy Shield Notice are able to seek resolution of their questions or complaints regarding the processing of their Personal

Information in accordance with the Principles. If an individual feels that Scout Exchange is not abiding by this Privacy Shield Notice or is not in compliance with the Principles, they should first contact Scout Exchange at the contact information provided below.

If an issue cannot be resolved through Scout Exchange's internal dispute resolution mechanism, individuals may submit a complaint to the International Centre for Dispute Resolution American Arbitration ((ICDR/AA) which provides, at no cost to the individual, an independent third-party dispute resolution option based in the U.S. To contact ICDR/AA and/or learn more about the company's dispute resolution services, including instructions for submitting a complaint, please the site at [www.adr.org](http://www.adr.org). If your dispute can't be resolved through use the above referenced independent recourse mechanisms, you may have the right to require that Scout Exchange enter into binding arbitration with you pursuant to the Privacy Shield's Resource, Enforcement, and Liability Principle and Annex 1 of the Privacy Shield.

#### **REGULATORY OVERRSIGHT**

Scout Exchange is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission ("FTC").

#### **AMENDMENT**

This Privacy Shield Notice may be amended consistent with the requirements of the EU-U.S. Privacy Shield Frameworks. When we update this Notice, we will also revise the "Last Updated" date at the top of this document.

#### **QUESTIONS OR COMPLAINTS**

If you have any questions, concerns or complaints regarding our privacy practices, or if you would like to exercise your choices or rights, you can contact us:

By email at [privacy@goscoutgo.com](mailto:privacy@goscoutgo.com)

By mailing to Scout Exchange, 501 Boylston St, Boston, MA 02116