

## **Grayboard Privacy Shield**

Grayboard, LLC complies with the EU-U.S Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information received from the European Union. Grayboard and its affiliates have certified that they adhere to the Privacy Shield principles of notice, choice, accountability for onward transfer, security, data integrity and purpose limitation, access, and recourse, enforcement and liability (“Principles”). If there is any conflict between the policies in this Statement and the Privacy Shield Principles, the Principles shall govern. To learn more about Privacy Shield, please visit the U.S. Department of Commerce Privacy Shield website: <https://www.privacyshield.gov/>. For more information regarding our Privacy Shield certification, please see: <https://www.privacyshield.gov/list>.

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### **Purpose**

The purpose of this Grayboard Privacy Shield Statement (“Statement”) is to outline how we comply with the Principles with respect to the personal information we collect. If you would like to obtain additional information regarding our privacy practices in connection with information collected on this website in general, please refer to our Privacy Policy. If there is any conflict between this Statement and the Privacy Policy, this Statement shall prevail.

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### **Scope**

This Statement applies to any personal information received by Grayboard and its affiliates from the European Union in reliance on Privacy Shield.

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### **Grayboard Data Processing Activities**

Grayboard may at times acts as a data processor or a data controller when processing personal data transferred from the EEA, depending on the Grayboard product or service. Though the types of data Grayboard collects and processes may vary depending on the product and our customers’ preferences, data we collect may typically includes billing and payments information, web browsing behaviour and other information relating to a user’s device used to access the services, and other information as described in our Privacy Policy. Grayboard may process this data for the purpose of billing and payments; customer service and product

support; communications and marketing; analytics to inform and improve our services; other internal purposes.

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## Principles

- 1. Notice.** We will provide individuals with notice of our data collection and processing practices in our [Privacy Policy](#), describing what personal information we collect, the purpose and use of personal information, the categories of third parties with whom we may share such information (and the purposes for which we do so), the individual's right to access such information, the choices and means through which the individual may limit the use and disclosure of personal information, and other disclosures consistent with the Notice Principle. Where we process personal information on behalf of an educational or other institution (each an "Institution") with which you have a direct relationship, we will work with them to help them provide appropriate notice to you.
- 2. Choice.** We offer individuals the opportunity to opt-out of personal information (or to provide explicit opt-in consent for sensitive information) being: (i) used for a purpose materially different from the purpose for which it was originally collected (as set out in our [Privacy Policy](#)) or subsequently authorized by you if such circumstances arise. You also have the ability to opt out at any time from the use of your personal information for direct marketing purposes, by following the unsubscribe procedures indicated in the mailing. To exercise this right, log in to your account through the Services and use the designated functionality. If you have further questions related to the above, you can also contact us at [privacy@Grayboard.com](mailto:privacy@Grayboard.com). Where we process personal information on behalf of an Institution, we will work with that Institution to comply with any individual's choices for limiting use or disclosure of personal.
- 3. Onward Transfers (Transfer to Third Parties).** Grayboard will not transfer personal information to third parties except for billing purposes (as described in our Privacy Policy). Where we transfer personal information to a third party, will take reasonable and appropriate steps to ensure the third party processes personal information for limited and specified purposes and in a manner consistent with Grayboard's Privacy Shield obligations. Where the transfer is to a third-party agent acting on our behalf, Grayboard may be liable if such third parties fail to meet those obligations, and we are responsible for the event giving rise to the damage.
- 4. Security.** We take reasonable and appropriate measures to protect personal information from loss, misuse and unauthorized access, disclosure, alteration and destruction. We have implemented appropriate physical, electronic and managerial procedures to help safeguard and secure personal information from loss, misuse, unauthorized access or disclosure, alteration or destruction.
- 5. Data Integrity and Purpose Limitation.** We will process personal information in a manner that is compatible with and relevant to the purpose for which it was collected or authorized by

individuals. Where we receive personal information from an Institution, it shall be the Institution that determines those purposes. To the extent necessary for those purposes, we will take reasonable steps to ensure that personal information is accurate, complete, current and reliable for its intended use.

6. **Access.** EU individuals have the right to reasonable access to the personal information about you that we hold. On request, we will also take reasonable steps to correct, update, amend or delete any information that is demonstrated to be inaccurate, except where the burden or expense of doing so would be disproportionate to the risks to your privacy in the case in question or where the rights of third parties would be violated. Where we process personal information on behalf of an Institution, we will direct any individual requests for access or to limit use or disclosure to the Institution, and we will work with such Institution in complying with such requests in accordance with applicable law and our obligations under Privacy Shield.
7. **Jurisdiction and Enforcement.** As part of our participation in Privacy Shield, we are subject to the investigatory and enforcement powers of the US Federal Trade Commission.
8. **Lawful Requests.** Grayboard may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.
9. **Contact Grayboard and Recourse**

If you have any questions about this Statement or the information that we collect from you in reliance on Privacy Shield, please contact us at [support@Grayboard.com](mailto:support@Grayboard.com) or write to:

Legal Department  
Grayboard LLC.  
67 Cold Hill Road  
Granby, MA 01033  
USA

In the event that you are concerned about how personal information you have provided to Grayboard has been used, please address your inquiry or complaint first to us at the address listed above. Grayboard takes all concerns about privacy and use of personal information very seriously, and shall endeavor to reply to you within 45 days of receiving a complaint.

If we fail to respond within that time, or if our response does not adequately address your concerns, you may submit your complaint free of charge to JAMS, Grayboard's designated Privacy Shield dispute resolution provider, using this link: <https://www.jamsadr.com/file-an-eu-us-privacy-shield-or-safe-harbor-claim>.

There may also be circumstances when disputes can be resolved through the Privacy Shield binding arbitration process. Please see the Privacy Shield website for further information: <https://www.privacyshield.gov/article?id=C-Pre-Arbitration-Requirements>.

Effective: January 18, 2017.