

Notice of Certification Under the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework

Highspot complies with the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks as set forth by the U.S. Department of Commerce regarding the collection, processing, use, and retention of Personal Data transferred from the European Union and the United Kingdom and/or Switzerland (“EU Data”) to the United States in reliance on Privacy Shield. Highspot has certified to the Department of Commerce that it adheres to the Privacy Shield Principles with respect to such information. If there is any conflict between the terms in the policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit the [Department of Commerce’s Privacy Shield website](#).

To learn more about recent developments relating to the Privacy Shield Framework, [click here](#).

Types of Personal Data Collected

Highspot, Inc. provides a software as a service sales enablement platform (the “Services”) that allows customers to curate their latest and most effective sales and marketing content for their reps in one place, making it easier for sales and marketing teams to find and deliver the right customer content to their customers. The types of personal data Highspot processes is determined by the types of content the customer uploads to the platform, but typically includes names and business emails of your Users, as well as those of your prospects and customers. While Highspot’s customers decide what data to submit, the types of Personal Data we may collect include, but are not limited to, your name, email address, password, location, job title, professional skills, phone number, social media handle, picture, and other biographical or identifying information you choose to provide.

When you access or use our Services, we automatically collect information about you, including log information and information collected by cookies and other tracking technologies (e.g. web beacons).

Purposes for Data Collection and Use

Highspot processes data submitted by customers for the purpose of providing Highspot’s online services to our customers. To fulfill these purposes, Highspot may access the data to provide the services, to correct and address technical or service problems, or to follow instructions of the Highspot customer who submitted the data, or in response to contractual requirements.

Inquiries and complaints

If you have questions or complaints, you can contact us by email at privacy@highspot.com

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, you may submit your complaint free of charge for resolution to the panel established by the EU data protection authorities (DPAs) and/or the Swiss Federal Data Protection and Information Commissioner (FDPIC). Highspot commits to cooperate with the panel established by the EU DPAs and/or FDPIC, as applicable and comply with the advice given by the panel and/or Commissioner, as applicable with regard to data transferred from the EU and/or Switzerland, as applicable.

Highspot has further committed to cooperate with the panel established by the EU DPAs and the FDPIC with regard to unresolved Privacy Shield complaints concerning human resources data transferred in reliance on the applicable Privacy Shield Framework in the context of an employment relationship.

If neither Highspot nor our dispute resolution provider resolves your complaint, you may have the possibility to engage in binding arbitration through the Privacy Shield Panel.

Type of third parties to which data is transferred and purposes for transfers

Highspot uses a limited number of third-party service providers to assist us in providing our services to customers. These third party providers offer customer support to our customers, perform database monitoring and other technical operations, assist with the transmission of data, and provide data storage services. These third parties may access, process, or store personal data in the course of providing their services. Highspot maintains contracts with these third parties restricting their access, use and disclosure of personal data in compliance with our Privacy Shield obligations, including the onward transfer provisions, and Highspot remains liable if they fail to meet those obligations and we are responsible for the event giving rise to damage.

Your rights to access, to limit use, and to limit disclosure:

EU individuals and Swiss individuals have rights to access personal data about them, and to limit use and disclosure of their personal data. With our Privacy Shield self-certification, Highspot has committed to respect those rights. Because Highspot personnel have limited ability to access data our customers submit to our services, if you wish to request access, to limit use, or to limit disclosure, please provide the name of the Highspot customer who submitted your data to our services. We will refer your request to that customer, and will support them as needed in responding to your request.

Investigatory and Enforcement Powers

With respect to personal information received or transferred pursuant to the Privacy Shield Frameworks, Highspot is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission.

Disclosing personal information in response to requests

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

Liability for onward transfers

Highspot is responsible for the processing of personal information it receives, under the applicable Privacy Shield Framework, and subsequently transfers to a third party acting as an agent on its behalf. Highspot complies with the Privacy Shield Principles for all onward transfers of personal information from the EEA and Switzerland including the onward transfer liability provisions.