



PRIVACY POLICY

CompSight, LLC

[Abstract](#)

Privacy Policy Provisions at
CompSight, LLC

Version 1.1

Effective September 29, 2016

Privacy Policy

OVERVIEW

CompSight, LLC (“CompSight”) respects the privacy of the confidential data it receives. CompSight has certified that it abides by the EU - U.S. Privacy Shield (“Privacy Shield”) principles as agreed between the U.S. Department of Commerce and the European Commission regarding the processing of Personal Data transferred from the European Economic Area (“EEA”) to the United States (“Privacy Shield Principles”). This Privacy Shield Policy (“Policy”) outlines our general policy and practices for implementing and complying with the Privacy Shield Principles for Personal Data, including both human resources (HR) and non-HR data, and the ways in which we collect, use and protect Personal Data.

DEFINITIONS

For purposes of this Policy:

“Personal Data” means any information that (i) is transferred to CompSight in the U.S. from the EEA, (ii) is recorded in any form, (iii) relates to an identified or identifiable individual (including Personnel), and (iv) can be linked to that individual.

NOTICE

In connection with CompSight’s processing of Personal Data, CompSight adheres to the EU-U.S. Privacy Shield Framework Principles issued by the U.S. Department of Commerce (the “Principles”). For more information about the Principles, please visit the Department of Commerce’s Privacy Shield website at <https://www.privacyshield.gov>. CompSight commits to be subject to the Principles for all Personal Data received from the EEA in reliance on Privacy Shield.

CompSight receives Personal Data in connection with services that it provides for its clients regarding employee compensation and benefits. CompSight obtains and processes Personal Data in delivering human resources and technology services for its clients.

In the normal course of delivering services, clients will provide Personal Data about employees such as name, pay, benefits, birth dates, employment dates, and contact information. Any Personal Data collected by CompSight will be considered as if collected by our clients, and provided to us as a third-party processor or sub-processor. CompSight

processes Personal Data under the direction of its clients pursuant to a written agreement, and has no direct control or ownership of the Personal Data it processes. CompSight may collect, use, access or share Personal Data for the purposes of providing the services, preventing or addressing service or technical problems, responding to support issues, responding to a client's or customer's instructions, or as may be required by law; all in accordance with the agreement between the client and CompSight. Clients are responsible to maintain their own privacy policy and for complying with any regulations or laws that require providing notice, disclosure and/or obtaining consent prior to providing any data to, or allowing the collection or use of such data by CompSight for processing purposes.

Please direct any inquiries or complaints regarding our compliance with the Principles to the point of contact listed in the "How to Contact CompSight" section below. If CompSight is unable to resolve your concern, CompSight commits to cooperate with the panel established by the EU data protection authorities (DPAs). In addition, CompSight commits to comply with the advice given by the panel with regard to human resources data transferred from the EU in the context of the employment relationship.

CompSight may disclose Personal Data to comply with or respond to lawful requests made by public authorities, including: to meet national security or law enforcement requirements; to comply with governmental, professional and legal obligations or inquiries; carry out investigations and perform internal administrative activities.

CompSight is subject to the investigatory and enforcement powers of the Federal Trade Commission. If CompSight shares Personal Data with a third-party service provider that processes the data solely on CompSight's behalf, then CompSight will be liable for that third party's processing of Personal Data in violation of the Principles, unless CompSight can prove that it is not responsible for the event giving rise to the damage.

CHOICE

Individuals who are served in a direct relationship with CompSight have the opportunity to make choices regarding certain CompSight Personal Data practices as provided in CompSight Privacy Shield Policy and in notices and other materials CompSight may provide in connection with the services provided by CompSight. Individuals may contact CompSight as indicated in the "How to Contact CompSight" section below regarding the firm's use or disclosure of their Personal Data. CompSight will provide individuals with reasonable methods to exercise their choices.

In most circumstances, CompSight maintains Personal Data about individuals with whom CompSight does not have a direct relationship because CompSight obtained the Personal

Data as a data processor for its clients or third parties using its services, those clients and third parties are responsible for providing the relevant individuals with certain choices with respect to the clients' or third parties' use or disclosure of the individual's Personal Data.

CompSight may disclose Personal Data without offering an opportunity to opt out (i) to service providers the firm has retained to perform services on its behalf, (ii) if it is required to do so by law or legal process, (iii) to law enforcement or other government authorities, (iv) when CompSight believes disclosure is necessary to prevent physical harm or financial loss, or (v) in connection with an investigation of suspected or actual illegal activity. CompSight also reserves the right to transfer Personal Data in the event it sells or transfers all or a portion of its business or assets (including in the event of a reorganization, dissolution or liquidation). Should such a sale or transfer occur, CompSight will use reasonable efforts to direct the transferee to use the Personal Data in a manner that is consistent with the Privacy Shield Policies of CompSight.

CompSight uses Personal Data only for the purposes indicated in this Policy unless it has a legal basis, such as consent, to use it for other purposes.

ACCOUNTABILITY FOR ONWARD TRANSFER OF PERSONAL DATA

CompSight may share Personal Data with non-affiliated parties as indicated in the "Choice" section above. CompSight also may share Personal Data as specified in notices and other materials in connection with services delivered by CompSight.

Except as permitted or required by applicable law, CompSight requires non-affiliated parties to whom it discloses Personal Data and who are not subject to the European Union Data Protection Directive 95/46 or an adequacy finding to either (i) subscribe to the relevant Principles or (ii) contractually agree to provide at least the same level of protection for Personal Data as is required by the relevant Principles.

SECURITY

CompSight takes reasonable and appropriate measures to protect Personal Data from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into due account the risks involved in the processing and the nature of personal data.

Although we make good faith efforts to store the information collected by CompSight in a secure operating environment that is not available to the public, CompSight cannot

guarantee complete security or the security of any information transmitted via the Internet or telecommunications networks.

DATA INTEGRITY AND PURPOSE LIMITATION

CompSight takes reasonable steps to ensure that the Personal Data the firm processes are (i) relevant for the purposes for which they are to be used, (ii) reliable for their intended use, and (iii) accurate, complete and current. In this regard, CompSight may rely on its clients and third parties using the services (with respect to Personal Data of individuals with whom CompSight does not have a direct relationship) to review, update and correct Personal Data to the extent necessary for the purposes for which the information was collected or subsequently authorized by the other individuals. Clients or third parties, as appropriate, may contact CompSight as indicated in the “How to Contact CompSight” section below to request that CompSight update or correct relevant Personal Data.

ACCESS

Where appropriate, CompSight provides individuals who have a direct relationship with CompSight with reasonable access to the Personal Data CompSight maintains about them. CompSight also provides a reasonable opportunity for those individuals to correct, amend or delete that information where it is inaccurate, as appropriate. CompSight may limit or deny access to Personal Data where providing such access is unreasonably burdensome or expensive under the circumstances, or as otherwise permitted by the Principles. The right to access Personal Data also may be limited in some circumstances by local law requirements. Individuals may request access to their Personal Data by contacting CompSight as indicated in the “How to Contact CompSight” section below.

In most circumstances, CompSight maintains Personal Data about individuals with whom CompSight does not have a direct relationship because CompSight obtained the data as a data processor, those clients and third parties are responsible for providing the relevant individuals with access to their Personal Data and the right to correct, amend or delete the information where it is inaccurate. In these circumstances, the relevant individuals should direct their questions to the appropriate party from which CompSight obtained the Personal Data. When an individual is unable to contact the appropriate party, or does not obtain a

response, CompSight will provide reasonable assistance in forwarding the individual's request to the appropriate party.

RECOURSE, ENFORCEMENT AND LIABILITY

CompSight has established procedures for periodically verifying implementation of and compliance with the Principles. CompSight conducts an annual self-assessment of its Personal Data practices to verify that the attestations and assertions the firm makes about its privacy practices are true and that the firm's privacy practices have been implemented as represented.

Individuals who have a direct relationship with CompSight may file a complaint concerning CompSight's processing of their Personal Data with CompSight, whose contact information is below. If CompSight is unable to resolve the concern, CompSight commits to cooperate with the panel established by the EU data protection authorities (DPAs). In addition, CompSight commits to comply with the advice given by the panel with regard to human resources data transferred from the EU in the context of the employment relationship. Under certain conditions specified by the Principles, you may also be able to invoke binding arbitration to resolve your complaint. CompSight is subject to the investigatory and enforcement powers of the Federal Trade Commission.

In circumstances in which CompSight maintains Personal Data about individuals with whom CompSight does not have a direct relationship because CompSight obtained the data as a data processor for its clients or third parties using the claims management services, individuals may submit complaints concerning the processing of their Personal Data to the relevant client or third party, in accordance with the client's or third party's dispute resolution process. CompSight will participate in this process at the request of the client, third party or individual.

HOW TO CONTACT COMPSIGHT, LLC

To contact CompSight with questions or concerns about this Policy or CompSight's practices concerning Personal Data:

Write to:

CompSight, LLC
Attention: Notifications
601 Carlson Parkway Ste 1050

Minnetonka, MN 55305
USA

Email: privacy@compsight.com

CHANGES TO THIS PRIVACY POLICY

We reserve the right to modify this Privacy Policy. If we do change our privacy practices, we will update this policy. If we make any material changes to this Privacy Policy, we provide notice on our website designating when the changes are effective.

Effective Date: September 29, 2016