



# Integrum Privacy Policy

Integrum Management Systems (“integrum”) complies with the EU-U.S. Privacy Shield Framework set forth by the United States Department of Commerce with respect to the collection, use and retention of Personal Data transferred from the European Economic Area (“EEA”) to the United States as further described in the Scope section below.

## Scope

Integrum Management Systems commits to comply with the Principles with respect to the Personal Data (Client Related) the company receives from its Customers or their Users in the EEA in connection with the use of (i) applications downloaded to a User’s mobile device (“Mobile Applications”); and (ii) Integrum Management System’s hosted software applications (the “Subscription Service”) and related support services (“Support Services”), as well as expert services (including professional services, training and certification) (the “Expert Services”) that we provide to Customers. In this Privacy Shield Policy, the Subscription Service, Support Services and the Expert Services are collectively referred to as the “Service.”

## Definitions

For the purposes of this Privacy Policy:

“Controller” means a person or organization which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.

“Customer” means any entity that purchases the Service.

“Customer Data” means the electronic data uploaded into the Subscription Service by or for a Customer or its Users.

“Device” means a mobile device.

“Personal Data” means any information, including Sensitive Data, that is (i) about an identified or identifiable individual and (ii) received by Integrum Management Systems in the U.S. from the EEA in connection with the Service.

“Processor” means any natural or legal person, public authority, agency or other body that processes Personal Data on behalf of a Controller.

“Sensitive Data” means Personal Data specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, sex life, the commission or alleged commission of any offense, any proceedings for any offense committed or alleged to have been committed by the individual or the disposal of such proceedings, or the sentence of any court in such proceedings.

“User” means an individual authorized by Customer to access and use the Subscription Service.

## Types of Personal Data Collected

Integrum Management Systems hosts and processes Customer Data, including any Personal Data contained therein, at the direction of and pursuant to the instructions of Integrum Management Systems’ Customers. Integrum Management Systems also collects several types of information from our Customers, including:

- Information and correspondence our Customers and Users submit to us in connection with Expert Services or other requests related to our Service.
- Information we receive from our business partners in connection with our Customers’ and Users’ use of the Service or in connection with services provided by our business partners on their behalf, including configuration of the Subscription Service.
- Information related to Users’ use of the Mobile Applications, including geographic location data and information regarding Users’ Devices and OS identification, login credentials, language and time zone.

In addition, Integrum Management Systems collects general information about its Customers, including a Customer’s company name and address and the Customer representative’s contact information (“General Information”) for billing and contracting purposes.

## Purposes of Collection and Use

Integrum Management Systems may use Personal Data submitted by our Customers and Users as necessary to provide the Service and Mobile Applications, including updating, enhancing, securing and maintaining the Subscription Service and Mobile Applications and to carry out Integrum Management Systems’ contractual obligations to its Customers. Integrum Management Systems also obtains General Information in connection with providing the Service and maintaining Integrum Management Systems’ relationships with its Customers.

## Third Party Disclosures

We may disclose Personal Data that our Customers and Users provide to our Service and Mobile Applications:

- To our subsidiaries and affiliates;
- To contractors, business partners and service providers we use to support our Service;
- In the event Integrum Management Systems sells or transfers all or a portion of its business or assets (including in the event of a merger, acquisition, joint venture, reorganization, dissolution or liquidation), in which case Personal Data held by us about our Customers will be among the assets transferred to the buyer or acquirer;
- If required to do so by law or legal process;
- In response to lawful requests from public authorities, including to meet national security, public interest or law enforcement requirements.

## Access

Individuals in the EEA generally have the right to access their Personal Data. As an agent processing Personal Data on behalf of its Customers, Integrum Management Systems does not own or control the Personal Data that it processes on behalf of its Customers or their Users and does not have a direct relationship with the Users whose Personal Data may be processed in connection with providing the Service. Since each Customer is in control of what information, including any Personal Data, it collects from its Users, how that information is used and disclosed, and how that information can be changed, Users of the Subscription Service should contact the applicable Customer administrator with any inquiries about how to access or correct Personal Data contained in Customer Data. To the extent a User makes an access or correction request to Integrum Management Systems, we will refer the request to the appropriate Integrum Management Systems Customer and will support such Customer as needed in responding to any request.

To access or correct any General Information Customer has provided, the Customer should contact their Integrum Management Systems account representative directly or by using the contact information indicated below.

## Choice

In accordance with the Principles, Integrum Management Systems will offer Customers and Users choice to the extent it (i) discloses their Personal Data to third party Controllers, or (ii) uses their Personal Data for a purpose that is materially different from the purposes for which the Personal Data was originally collected or subsequently authorized by the Customer or User. To the extent required by the Principles, Integrum Management Systems also will obtain opt-in consent if it engages in certain uses or disclosures of Sensitive Data. Unless Integrum Management Systems offers Customers and Users an appropriate choice, Integrum Management Systems uses Personal Data only for purposes that are materially the same as those indicated in this Policy.

Integrum Management Systems may disclose Personal Data of Customers and Users without offering an opportunity to opt out, and may be required to disclose the Personal Data, (i) to third-party Processors that Integrum Management Systems has retained to perform services on its behalf and pursuant to its instructions, (ii) if it is required to do so by law or legal process, or (iii) in response to lawful requests from public authorities, including to meet national security, public interest or law enforcement requirements. Integrum Management Systems also reserves the right to transfer Personal Data in the event of an audit or if the company sells or transfers all or a portion of its business or assets (including in the event of a merger, acquisition, joint venture, reorganization, dissolution or liquidation).

## Liability for Onward Transfers

Integrum Management Systems complies with the Privacy Shield's Principle regarding accountability for onward transfers. Integrum Management Systems remains liable under the Principles if its onward transfer recipients process Personal Data in a manner inconsistent with the Principles, unless Integrum Management Systems proves that it was not responsible for the event giving rise to the damage.

# Dispute Resolution

In compliance with the Privacy Shield Principles, Integrum Management Systems commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact Integrum Management Systems at: [privacy@integrumsystems.com](mailto:privacy@integrumsystems.com)

Further, Integrum Management Systems commits to cooperate with EU data protection authorities (DPAs) and comply with the advice given by such authorities with regard to human resources data transferred from the EU.

The mediator may propose any appropriate remedy, such as deletion of the relevant Personal Data, publicity for findings of non-compliance, payment of compensation for losses incurred because of non-compliance, or cessation of processing of Personal Data of the Customer or User who brought the complaint. The mediator, or the Customer or User, also may refer the matter to the U.S. Federal Trade Commission, which has Privacy Shield investigatory and enforcement powers over Integrum Management Systems. Under certain circumstances, Customers and Users may be able to invoke binding arbitration to address complaints about Integrum Management Systems' compliance with the Principles.

## How to Contact Integrum Management Systems

To ask questions or comment about this Privacy Shield Policy and our privacy practices or if you need to update, change or remove your information, contact us at: [privacy@integrumsystems.com](mailto:privacy@integrumsystems.com)