

## Dubsado's Notice of EU-U.S. Privacy Shield Framework Standards

Effective as of April, 2018

Dubsado is certified under the Privacy Shield Certification and has taken steps to comply 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 transferred from the European Union to the United States. Dubsado has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy 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 <https://www.privacyshield.gov/>

In compliance with the Privacy Shield Principles, Dubsado 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 Dubsado at: [hello@dubsado.com](mailto:hello@dubsado.com)

Dubsado has committed to refer unresolved privacy complaints under the Privacy Shield to an independent dispute resolution mechanism, established by JAMS. If Dubsado cannot address your complaint in a timely or sufficient manner, please contact them for more information and to file a complaint: <https://www.jamsadr.com/file-an-eu-us-privacy-shield-or-safe-harbor-claim>

**Overview:** Dubsado will adhere to the principles of the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework with respect to personal data submitted by Dubsado's customers in reliance on the Privacy Shield.

**Data we process:** Dubsado provides services that allow customers to manage various aspects of their businesses online. This takes shape in the form of client management, client relation and workflow automation services. In order to provide these services, we may be required to collect basic identification information, financial and billing information, as well as information via cookies and other website navigational tools. While providing these services, customers agree to allow Dubsado to process information that we either collect from them or on their behalf. Customers decide what data to submit, specifically as it pertains to their own business information, for example leads, jobs, bookkeeping, content, client financial information etc).

**Data processing purposes:** Dubsado processes customer submitted data necessary to provide online services necessary to our customers. In order to do this, Dubsado may be required to access data to complete services, address any service or tech related issues, to comply with customer requests regarding their data, or to meet any legal or contractual obligations.

**Third parties we disclose information, why and our liability:** Dubsado maintains affiliate or partnership relationships with various third-parties that allow us to deliver and execute our services. Dubsado uses the following Sub Processors:

- Amazon Web Services, Inc.
- Intercom R&D Unlimited Company
- Intuit, Inc.
- Square, Inc.
- Stripe, Inc.
- PayPal (Europe) S.á.r.l. et Cie, S.C.A. d/b/a Braintree
- The Rocket Science Group LLC d/b/a MailChimp
- Cloudspot, Inc.
- Zapier, Inc.
- Cronofy Limited
- Cloudinary Ltd
- Google LLC

These services can range from offering features, customer and technical support, data monitoring, transmitting and storage. In order to accomplish these services, it may be necessary for third parties to access, process, transmit or store customer data. Dubsado has taken steps to make sure these third parties have met the standards of restriction on access and disclosure of personal data, in accordance with our Privacy Shield compliance. In the event that compliance is not met, Dubsado may be liable in cases of onward transfers from third parties.

**Rights of individuals to access, 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 certification, Dubsado has committed to respect those rights. Because Dubsado 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 Dubsado 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.

**U.S. Federal Trade Commission and/or Department of Transportation enforcement:** Dubsado's is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC) and/or the Department of Transportation.

**Concerns and possibility to invoke binding arbitration:** Regarding any questions or concerns in respects to how Dubsado manages your personal data, or how our services relate to Privacy Shield, please inquire at [hello@dubsado.com](mailto:hello@dubsado.com). We commit to responding within a reasonable

time. If either we or a third party brought in to resolve any complaints fail to resolve the issue, you may be eligible to engage in binding arbitration through the Privacy Shield Panel.

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