



## Recognize Services, Inc. Privacy Shield Policy

### I. Overview

Recognize Services, Inc. ("Recognize") complies with the EU-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union members countries. Recognize has certified that it adheres to the Privacy Shield Principles. If there is any conflict between the policies 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 page, please visit <https://www.privacyshield.gov/>

### II. 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 Service by or for a Customer or its Users.

"EU" means the European Union and Iceland, Liechtenstein and Norway

"Personal Data" means any information, including Sensitive Data, that is (i) about an identified or identifiable individual and (ii) received by Recognize in the U.S. from the EU 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.

"Privacy Shield Principles" means the Principles and Supplemental Principles of the Privacy Shield.

"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 Service.

## **II. Types of Personal Data Collected and Purpose**

Recognize hosts and processes Personal Data to carry out functions and activities at the direction of and pursuant to the instructions of Recognize Customers or Users when they purchase our products, register with our website, log-in to their account, complete surveys, request information from us, or otherwise communicate with us. The types of Personal Data from Customers or Users Recognize may collect or have access to in connection with include:

- Name
- Email address
- Employment history
- Birthday
- Work phone number
- Password
- Job title
- Profile image

In addition, data collection also occurs, for example, when a Customer visits Recognize's website.

- Contact information, such as name, postal address, email address and telephone number; and
- Personal Data in content Customers provide on Recognize's website and other data collected automatically through the website (such as IP addresses, browser characteristics, device characteristics, operating system, language preferences, referring URLs, information on actions taken on our website, and dates and times of website visits).

Recognize may also obtain Personal Data, such as contact information, such as name, and financial account information, of its Customer's representatives. Recognize uses this information to manage relationships with its Customers, process payments, expenses, and reimbursements, and carry out Recognize's obligations under its contracts with Customers.

Recognize 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 in the context of the employment relationship.

## **III. Notice**

Recognize notifies Customers and Users about its privacy practices, including the purposes for which it collects and uses Personal Data, the types of Personal Data Recognize collects, the types of third parties to which Recognize discloses the Personal Data and the purposes for doing so, the rights and choices Customers and Users have for limiting the use and disclosure of their Personal Data, and how to contact Recognize about its practices concerning Personal Data.

#### **IV. Third Party Disclosures**

Recognize discloses Personal Data only to Third Parties who reasonably need to know such data. Such recipients must agree to abide by confidentiality obligations. All Third Parties receiving personal information must have a written confidentiality agreement in place between Customer and Third Party and Recognize and Third Party that meets or exceeds Privacy Shield standards.

Recognize may disclose Personal Data that our Customers and Users provide to our Service:

- To contractors, business partners and service providers we use to support our Service;
- In the event Recognize 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.

Third Parties to which Personal Data is disclosed:

- Mandrill//Mailchimp: Email delivery provider. Email address is disclosed along with content generated from the platform such as recognition message and recipients.
- Amazon Web Services (AWS): Web services infrastructure and provider. AWS hosts our primary database(s), which contain user's email address, name, phone number, and job title. Information is encrypted in transit and at rest.

#### **V. Access**

Customers and users in the EU generally have the right to access their Personal Data. If such Personal Data is inaccurate or processed in violation of the Privacy Shield Principles, a Customer or User may also request that the Personal Data be corrected, amended, or deleted.

When Recognize receives Personal Data, it does so on its Customer's or User's behalf. To request access to, or correction, amendment or deletion of Personal Data, Customers or Users should contact Recognize that collected their Personal Data. Recognize will support such Customer or User as needed in responding to any request.

To access or correct any general information the Customer or User has provided, the Customer or User should contact Recognize directly or by using the contact information indicated below.

#### **VI. Choice**

Recognize generally offers Customers and Users the opportunity to choose whether their Personal Data may be (a) disclosed to third-party Controllers or (b) used for a purpose that is materially different from the purposes for which the information was originally collected or subsequently authorized by the relevant Customers or Users. To the extent required by the Privacy Shield Principles, Recognize obtains opt-in consent for certain uses and disclosures of Sensitive Data. Unless Recognize offers Customers or Users an appropriate choice, the company uses Personal Data only for purposes that are materially the same as those indicated in this Policy. To exercise their choices, Customers and Users may contact Recognize as indicated in this Policy or the other Privacy Policies.

Recognize may disclose Employee Personal Data and Consumer Personal Data without offering an opportunity to opt out, and may be required to disclose the Personal Data, (c) to third-party Processors the company has retained to perform services on its behalf and pursuant to its instructions, (d) if it is required to do so by law or legal process, or (e) in response to lawful requests from public authorities, including to meet national security, public interest or law enforcement requirements. Recognize 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).

We will also provide EU individuals with opt-out or opt-in choice before we share their data with third parties other than our agents, or before we use it for a purpose other than which it was originally collected or subsequently authorized.

To limit the use and disclosure of your personal information, please submit a written request to [support@recognizeapp.com](mailto:support@recognizeapp.com).

## **VII. Liability for Onward Transfers**

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

## **VIII. Recourse**

In compliance with the Privacy Shield Principles, Recognize commits to resolve complaints about your privacy and our collection or use of your personal information. European Union individuals with inquiries or complaints regarding this privacy policy should first contact Recognize at:

### **[Recognize Privacy Support](#)**

**Address:**

Recognize  
220 4<sup>th</sup> Street, Suite 200  
Oakland, CA 94607

**Privacy Support E-mail Address:** [support@recognizeapp.com](mailto:support@recognizeapp.com)

**Phone Number:** 866.288.0373

Recognize has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by BBB National Programs. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <https://bbbprograms.org/privacy-shield-complaints/> for more information and to file a complaint. This service is provided free of charge to you.

Recognize is subject to the investigatory and enforcement powers of the Federal Trade Commission.

Under certain circumstances, Customers also may be able to invoke binding arbitration to address complaints about Recognize's compliance with the Privacy Shield Principles.

## **IX. Changes to this Policy**

This Policy may be amended from time to time, consistent with the requirements of the EU-U.S. Privacy Shield principles. Appropriate public notice will be given concerning such amendments.

Effective Date: April 16, 2018

Updated: February 17, 2022