

## **Giva's Notice of Certification Under the EU-U.S. Privacy Shield Framework**

Effective as of August 1, 2016

Giva has certified certain of our services, for which we act as a data processor, under the [EU-U.S. Privacy Shield Framework](#) (the certification can be found [here](#)).

**Scope:** Giva adheres to the principles of the EU-U.S. Privacy Shield framework with respect to personal data submitted by Giva's customers in reliance on the Privacy Shield.

**Data processed:** Giva provides cloud service management tools that our customers use to operate aspects of their businesses. In providing these tools, Giva processes data our customers submit to our services or instruct us to process on their behalves. While Giva's customers decide what data to submit, it typically includes information about their customers, employees and patients.

**Purposes of data processing:** Giva processes data submitted by customers for the purpose of providing Giva's cloud service management tools to our customers. To fulfill these purposes, Giva may access the data to provide the services, to correct and address technical or service problems, or to follow instructions of the Giva customer who submitted the data, or in response to contractual requirements.

**Inquiries and complaints:** If you believe Giva maintains your personal data in one of the services within the scope of our Privacy Shield certification, you may direct any inquiries or complaints concerning our Privacy Shield compliance to [legalcompliance@givainc.com](mailto:legalcompliance@givainc.com). Giva will respond within 45 days. If we fail to respond within that time, or if our response does not address your concern, you may contact JAMS, which provides an independent third-party dispute resolution body based in the United States, [here](#). JAMS has committed to respond to complaints and to provide appropriate recourse. If neither Giva nor JAMS resolves your complaint, you may have the possibility to engage in binding arbitration through the Privacy Shield Panel.

**Third parties who may receive personal data:** Giva does not transfer data to third parties, but Giva does use a limited number of third-party service providers to assist us in providing our services to customers. These third party offer HIPAA hosting and other hosting services, monitoring, other technical operations, and provide data storage and back up services. These third parties may process or store personal data in the course of providing their services. Giva maintains contracts with these third parties restricting their access, use and disclosure of personal data in compliance with our Privacy Shield obligations, and Giva may be liable if they fail to meet those obligations.

**Your rights to access, to limit use, and to limit disclosure:** EU individuals have rights to access personal data about them, and to limit use and disclosure of their personal data. With our Privacy Shield certification, Giva has committed to respect those rights. Because Giva 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 Giva 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 enforcement:** Giva's commitments under the Privacy Shield are subject to the investigatory and enforcement powers of the United States Federal Trade Commission.

**Compelled disclosure:** Giva may be required to disclose personal information in response to lawful requests by public authorities, including meeting national security or law enforcement requirements.