



## Privacy Shield Information

Brightly complies 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. Brightly 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, Brightly 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 Brightly at: [support@brightlysoftware.com](mailto:support@brightlysoftware.com).

Brightly has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints concerning data transferred from the EU.

Brightly is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC) as outlined in the “Enforcement” section of the [FTC Privacy and Data Security Update \(2016\)](#). Under certain conditions, individuals with data privacy complaints may invoke binding arbitration; the Privacy Shield arbitration process is described in detail [here](#).

In the context of an onward transfer of data to a third party, Brightly has responsibility for the processing of personal information it receives under the Privacy Shield and subsequently transfers to a third party acting as an agent on its behalf. Brightly remains liable under the Privacy Shield Principles if its agent processes such personal information in a manner inconsistent with the Privacy Shield Principles, unless the organization proves that it is not responsible for the event giving rise to the damage.

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