

**Digital Measures Notice of Certification Under the EU-U.S. Privacy Shield Framework  
and the Swiss-U.S. Privacy Policy Framework**

**Effective as of July 24, 2017**

Digital Measures 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:** Digital Measures, LLC. adheres to the principles of the EU-U.S. Privacy Shield framework and the Swiss-U.S. Privacy Policy Framework with respect to personal data submitted by Digital Measures customers in reliance on the Privacy Shield.

**Data Processed:** Digital Measures provides online tools that our customers use to operate aspects of their businesses. These include tools for data management and reporting, among others. In providing these tools, Digital Measures processes data our customers submit to our services or instruct us to process on their behalves. While Digital Measures customers decide what data to submit, it typically includes information about faculty teaching, research and service activities.

**Purposes Of Data Processing:** Digital Measures processes data submitted by customers for the purpose of providing Digital Measures online services to our customers. To fulfill these purposes, Digital Measures may access the data to provide the services, to correct and address technical or service problems, or to follow instructions of the Digital Measures customer who submitted the data or in response to contractual requirements.

**Inquiries and Complaints:** If you believe Digital Measures 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 [privacy@digitalmeasures.com](mailto:privacy@digitalmeasures.com). Digital Measures 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 the International Centre for Dispute Resolution/American Arbitration Association (ICDR/AAA), which provides an independent third-party dispute resolution body based in the United States, [here](#). ICDR/AAA has committed to respond to complaints and to provide appropriate recourse at no cost to you. If neither Digital Measures nor ICDR/AAA 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:** Digital Measures uses a limited number of third-party service providers to assist us in providing our services to clients. These third party providers assist with the transmission of data, provide data storage services and other technical operations. These third parties may access, process, or store personal data in the course of providing their services. Digital Measures maintains contracts with these third parties restricting their access, use and disclosure of personal data in compliance with our Privacy Shield obligations, and Digital Measures may be liable if they fail to meet those obligations and we are responsible for the event giving rise to the damage.

**Your Rights To Access, To Limit Use, And To Limit Disclosure:** EU 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, Digital Measures has committed to respect those rights. Because Digital Measures 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 Digital Measures

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:** Digital Measures commitments under the Privacy Shield are subject to the investigatory and enforcement powers of the United States Federal Trade Commission.

**Compelled Disclosure:** Digital Measures may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.