

### Highwire, Inc.

Active Participant

### Other Covered Entities

**♥** Highwire, Inc.

### Industries

Information and Communications Technology Software
Application Software

# Participation

#### SWISS-U.S. PRIVACY SHIELD FRAMEWORK: ACTIVE

Original Certification Date: 6/12/2020 Next Certification Due Date: 5/14/2024

Data Collected: NON-HR

#### **EU-U.S. PRIVACY SHIELD FRAMEWORK: ACTIVE**

Original Certification Date: 6/12/2020 Next Certification Due Date: 5/14/2024

Data Collected: NON-HR

#### **PURPOSE OF DATA COLLECTION**

o All personal data that is provided by enrolled users relates solely to their use of Highwire's vendor pre-qualification software applications. Highwire's suite of software applications include CS Safety, CS Finance, CS Tracker, and CS Inspect. Personal user data includes names, business emails, and business phone numbers. Users of the Highwire Inspect module may also opt to provide their business cell phone numbers in order to receive alerts regarding inspection findings. All of this data is required as part of an enrolled client's interaction and use of the Highwire system to allow users to set up secure accounts and to receive messages and alerts from the system. Highwire does not disclose or sell any personal information to any third party. Highwire processes personal data solely for the business purposes described above. Further, Highwire's cloud-based application is hosted by Amazon Web Services on servers in both the United States and Frankfort, Germany, to ensure that data from European Union (EU) countries (including Iceland, Liechtenstein, Norway, and Switzerland) is kept in an EU country. Amazon Web Services maintains its own compliance with both the EU-US Privacy Shield Framework and the SWISS-US Privacy Shield Framework.

## Privacy Policy

#### **NON-HR DATA**

Document: Highwire Privacy Policy ()

Description:

The purpose of the Highwire Privacy Policy is to define the conditions of privacy under which Highwire operates its general website and under which it uses, processes, and stores the data that it collects from enrolled clients who log into and use the Highwire vendor-prequalification application.

Effective Date: 4/3/2023

Document: Highwire Privacy Policy (https://www.highwire.com/privacy-policy)

Description:

The purpose of the Highwire Privacy Policy is to define the conditions of privacy under which Highwire operates its general website and under which it uses, processes, and stores the data that it collects from enrolled clients who log into and use the Highwire vendor-prequalification application. The Highwire Privacy Policy is intended to clearly and thoroughly explain our policies around cookies, data collection, data use, data processing, data transfer, data retention and deletion, notifications of personal data breaches, and how you can contact Highwire to manage or delete your information/account.

Effective Date: 2/17/2022

Document: Highwire Privacy Policy (https://www.highwire.com/privacy-policy)

Description:

The purpose of the Highwire Privacy Policy is to define the conditions of privacy under which Highwire operates its general website and under which it uses, processes, and stores the data that it collects from enrolled clients who log into and use the Highwire vendor-prequalification application. The Highwire Privacy

Policy is intended to clearly and thoroughly explain our policies around cookies, data collection, data use, data processing, data transfer, data retention and deletion, notifications of personal data breaches, and how you can contact Highwire to manage or delete your information/account.

Effective Date: 5/19/2022 VERIFICATION METHOD

Self-Assessment

### Dispute Resolution

#### **QUESTIONS OR COMPLAINTS?**

If you have a question or complaint regarding the covered data, please contact Highwire, Inc. at:

Karen Sardone

Vice President of Compliance

Highwire, Inc.

700 District Avenue

Burlington, Massachusetts 01803

karen.sardone@highwire.com (mailto:karen.sardone@highwire.com)

Phone: (617) 448-9957 (tel:(617) 448-9957)

Privacy Shield organizations must respond within 45 days of receiving a complaint.

If you have not received a timely or satisfactory response from Highwire, Inc. to your question or complaint, please contact the independent recourse mechanism listed below

#### NON-HR RECOURSE MECHANISM

ICDR/AAA Privacy Shield Program (http://go.adr.org/privacyshield.html)

Appropriate statutory body with jurisdiction to investigate any claims against Highwire, Inc. regarding possible unfair or deceptive practices and violations of laws or regulations covering privacy Federal Trade Commission (https://www.ftc.gov)

