



# Lightcast Privacy Shield Policy

## *Scope*

The Lightcast Privacy Shield Policy (“Policy”) applies to the collection and processing of Personal Data that Lightcast obtains from Data Subjects located in the European Union (“EU”) and the United Kingdom. The Policy describes how Lightcast collects, uses, and discloses certain data about an identified or identifiable individual that it receives in the United States from the EU and the United Kingdom. This policy also applies to Lightcast’s UK affiliate, Economic Modelling UK Ltd.

This Policy does not cover data from which individual persons cannot be identified or situations in which pseudonyms are used. (The use of pseudonyms involves the replacement of names or other identifiers with substitutes, so that identification of individual persons is not possible.)

Lightcast recognizes that the EU has established strict protections regarding the handling of EU Personal Data, including requirements to provide adequate protection for EU Personal Data transferred outside of the EU. To provide adequate protection for certain EU Personal Data relating to website users, customers, prospective customers, partners, vendors, third party suppliers, and contractors that Lightcast receives in the U.S., Lightcast complies with the EU-US Privacy Shield Framework (“Privacy Shield”) as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Data transferred from the European Union and the United Kingdom to the United States. Lightcast has certified to the Department of Commerce that it adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement, and Liability. If there is any conflict between the terms in this Policy and the Privacy Shield, the Privacy Shield shall govern.

## *Renewal and Verification*

Lightcast will renew its Privacy Shield certification annually unless it subsequently determines that it no longer needs such certification or if it employs a different adequacy mechanism.

Prior to the recertification, Lightcast will conduct an in-house verification to ensure that its attestations and assertions regarding its treatment of Personal Data are accurate and that Lightcast has appropriately implemented those practices. Specifically, as part of the verification process, Lightcast will undertake the following:

- Review this Policy and its publicly posted website privacy policy to ensure that these policies accurately describe the practices regarding the collection of Personal Data;
- Ensure that the publicly posted Policy informs Data Subjects of Lightcast’s participation in the Privacy Shield program and where to obtain a copy of additional information (e.g., a copy of this Policy);
- Ensure that this Policy continues to comply with the Privacy Shield principles;
- Confirm that Data Subjects are made aware of the process for addressing complaints and any independent dispute resolution process (Lightcast may do so through its publicly posted website, Customer contract, or both);
- Review its processes and procedures for training Employees about Lightcast’s participation in the Privacy Shield program and the appropriate handling of Personal Data.

## *Enforcement*

For purposes of enforcing compliance with the Privacy Shield, Lightcast is subject to the investigatory and enforcement authority of the U.S. Federal Trade Commission. For more information about the Privacy Shield, see the U.S. Department of Commerce's Privacy Shield website located at <https://www.privacyshield.gov>.

To review Lightcast's Privacy Shield certification, see the U.S. Department of Commerce's list of Privacy Shield certified companies located at <https://www.privacyshield.gov/list>.

## ***Responsibilities and Management***

Lightcast has designated its Legal Department to oversee its compliance with the EU-US Privacy Shield program. The Lightcast Legal Department shall review and approve any material changes to this program as necessary. Any questions, concerns, or comments regarding this Policy also may be directed to [legal@lightcast.io](mailto:legal@lightcast.io).

## ***Collection and Use of Personal Data***

Collection and Use of Personal Data. Lightcast collects the following types of Personal Data from Customers that subscribe to Lightcast services: contact information (including name, work email address, work mailing address, work telephone number, and title), company name, payment information, and the school the user is attending (for Career Coach/SkillsMatch users only). Lightcast may also collect the same categories of information from the Customer's authorized users, or from visitors to Lightcast's websites who choose to provide Lightcast with their personal information.

Lightcast collects the following types of Personal Data from Data Subjects who use Lightcast's online services: username (which may, but is not required to be, an email address), password, email address, IP address, browser type, site activity.

What items of Personal Data Lightcast collects depends on what service is being used.

The information Lightcast collects is used for the following purposes:

- Transactions with Customers (including Customer outreach, satisfying contracting, payment, government reporting, tax, and other requirements)
- Providing services to users
- User authorization for services that require a login
- Session management
- Customer support
- Usage analytics for product improvement
- Software error tracking
- Network and IT system security

Lightcast does not collect Sensitive Data.

## ***Disclosures and Onward Transfers of Personal Data***

Except as otherwise provided herein, Lightcast may provide Personal Data to Third Parties who reasonably need to know such data, and only for the scope of the initial transaction and not for other purposes. Such Third Parties act as agents, consultants, and contractors to perform tasks on behalf of Lightcast and under Lightcast's instructions. For example, Lightcast may store Personal Data in facilities operated by Third Parties, or transmit Personal Data to Third Parties which conduct usage analytics and provide feedback for product improvement. Such Third Parties must agree to use such Personal Data only for the purposes for which they have been engaged by Lightcast, and they must either:

- a. comply with the Privacy Shield principles or another mechanism permitted by the applicable EU data protection law(s) for transfers and processing of Personal Data; or
- b. agree to provide adequate protections for the Personal Data that are no less protective than those set out in this Policy.

Additionally, and solely with respect to Career Coach and SkillsMatch, Lightcast provides the institution purchasing Career Coach with the information the users of such institution's instance of Career Coach input into Career Coach, as is noted in Lightcast's publicly-posted privacy policy.

Lightcast also may disclose Personal Data for other purposes or to other Third Parties when a Data Subject has consented to or requested such disclosure. Please be aware that Lightcast may be required to disclose an individual's Personal Data in response to a lawful request by public authorities, including to meet national security or law enforcement requirements.

Lightcast remains liable for appropriate onward transfers of personal data to Third Parties.

### ***Data Integrity and Security***

Lightcast uses reasonable efforts to maintain the accuracy and integrity of Personal Data and to update it as appropriate. Lightcast has implemented physical and technical safeguards to protect Personal Data from loss, misuse, unauthorized access, disclosure, alteration, or destruction. For example, electronically stored Personal Data is stored on a secure network with firewall protection and, where appropriate, encryption. Access to Lightcast's electronic information systems requires user authentication via password or similar means. Lightcast also employs role-based access restrictions, limiting the scope of employees who have access to Personal Data. Lightcast employees may access Personal Data only if they are authorized to do so and only for the purposes for which they are authorized. Despite these precautions, no data security safeguards guarantee 100% security all the time.

### ***Notification and Consent***

Lightcast notifies Data Subjects about its adherence to the EU-US Privacy Shield principles through its publicly posted website privacy policy, available at:

[www.lightcast.io/privacy-policy](http://www.lightcast.io/privacy-policy)

Lightcast obtains approval and adherence to the current Policy in the transactional process. Data Subjects who use Lightcast's online services are notified of the policy and asked for consent when they create a login, or at another appropriate point during interaction with Lightcast's websites.

### ***Right to Access, Change, or Delete Personal Data***

Right to Access. Data Subjects have the right to know what Personal Data about them is included in the databases and to ensure that such Personal Data is accurate and relevant for the purposes for which Lightcast collected it. Data Subjects may review their own Personal Data stored in the databases and correct, erase, or block any data that is incorrect, as permitted by applicable law and Lightcast policies. Upon reasonable request and as required by the Privacy Shield principles, Lightcast allows Data Subjects access to their Personal Data to correct or amend such data where inaccurate. Data Subjects may edit some of their Personal Data by logging into their account profile if they have created one, and may request more extensive editing by contacting Lightcast as specified below. In making modifications to their Personal Data, Data Subjects must provide only truthful, complete, and accurate information. To request erasure of Personal Data, Data Subjects should submit a written request to Lightcast as specified below.

Requests for Personal Data. Lightcast will track each of the following and will provide notice to the appropriate parties under law or contract when either of the following circumstances arise: (a) legally binding request for disclosure of the Personal Data by a law enforcement authority, unless notice is prohibited by law or regulation; or (b) requests received from the Data Subject.

Satisfying Requests for Access, Modifications, and Corrections. Lightcast will endeavor to respond in a timely manner to all reasonable written requests to view, modify, or delete inactive Personal Data. If Lightcast receives a data-deletion request, we will remove the data from our live systems. The data will continue to be stored on our encrypted backup systems, but we will not conduct any further processing of the data. Further, we will keep the deletion request on file, and will delete the data from any backups we may restore to a live system in the future.

## ***How to Exercise Your Rights***

To submit a request for access, correction, amendment, or deletion, please email: [privacy@lightcast.io](mailto:privacy@lightcast.io) for access to our privacy portal. We will review any such request and respond in a timely fashion with either a notice that we have complied with your request, or an explanation as to why we are unable to comply.

## ***Changes to This Policy***

This Policy may be amended from time to time, consistent with the Privacy Shield Principles and applicable data protection and privacy laws and principles. Lightcast will make employees aware of changes to this Policy. We will notify Data Subjects if we make changes that materially affect the way we handle Personal Data previously collected, and we will allow them to choose whether their Personal Data may be used in any materially different manner.

## ***Questions or Complaints***

In compliance with the Privacy Shield Principles, Lightcast commits to resolve complaints about our collection or use of your personal information. Individuals with inquiries or complaints regarding our Privacy Shield policy should first contact Lightcast at:

- email: [legal@lightcast.io](mailto:legal@lightcast.io)
- telephone: 1-208-883-3500
- mail: Lightcast  
232 N. Almon St.  
Moscow ID 83843 USA

## ***Enforcement and Dispute Resolution***

In compliance with EU-US Privacy Shield Principles, Lightcast commits to resolve complaints about your privacy and our collection or use of your Personal Data. Data Subjects with questions or concerns about the use of their Personal Data should contact Lightcast at [legal@lightcast.io](mailto:legal@lightcast.io).

If a question or concern cannot be satisfied directly, Lightcast has further committed to refer unresolved privacy complaints under EU-US Privacy Shield to an independent dispute resolution mechanism operated by JAMS. If you do not receive timely acknowledgement of your complaint, or if your complaint is not satisfactorily addressed by Lightcast, EU Data Subjects may bring a complaint before the JAMS EU-US Privacy Shield Dispute Resolution at <https://www.jamsadr.com/eu-us-privacy-shield>. Finally, as a last resort and in limited situations, EU individuals may seek redress through binding arbitration.

## Definitions

Capitalized terms in this Privacy Policy have the following meanings:

**"Customer"** means a prospective, current, or former partner (distributor or reseller), vendor, supplier, customer, or client of Lightcast. The term also shall include any individual agent, employee, representative, customer, or client of an Lightcast Customer where Lightcast has obtained his or her Personal Data from such Customer as part of its business relationship with the Customer.

**"Data Subject"** means an identified or identifiable natural living person. An identifiable person is one who can be identified, directly or indirectly, by reference to a name, or to one or more factors unique to his or her personal physical, psychological, mental, economic, cultural, or social characteristics.

**"Employee"** means an employee (whether temporary, permanent, part-time, or contract), former employee, independent contractor, or intern of Lightcast or any of its affiliates or subsidiaries, who is also a resident of a country within the European Economic Area.

**"Europe"** or "European" refers to a country in the [European Economic Area](#).

**"Personal Data"** means information that a) is transferred from the European Economic Area (EEA) or the United Kingdom to the United States in reliance on the Privacy Shield Framework; b) is about, or pertains to, a specific individual; and c) can be linked either directly or indirectly to that individual. Personal Data does not include data that is de-identified, anonymous, or publicly available.

**"Third Party"** means any individual or entity that is neither Lightcast nor an Lightcast employee, agent, contractor, or representative.

*Revised 17 February 2023*