

# Consignor LLC Privacy Shield Policy

Version 1.1

In force from March 1, 2019.



## Consignor LLC Privacy Shield Policy

Consignor LLC a U.S. member firm of the Consignor Group has adopted this Privacy Shield Policy ("Policy") to establish and maintain an adequate level of Personal Data privacy protection. This Policy applies to the processing of Personal Data that Consignor obtains from individuals located in the European Economic Area (EEA) and Switzerland.

Consignor LLC complies with the EU-U.S. Privacy Shield Framework and the Swiss – U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Data transferred from the European Economic Area (EEA) and Switzerland to the United States, respectively. Consignor LLC has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in the Consignor Privacy Policy (please visit <https://www.consignor.com/privacy-shield/> ) 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/>.

The US Federal Trade Commission has jurisdiction over Consignor LLC's compliance with the EU-US and Swiss-US Privacy Shield Framework.

In compliance with the Privacy Shield Principles, Consignor LLC commits to resolve complaints about your privacy and our collection or use of personal information transferred to the United States pursuant to Privacy Shield. EU/EEA and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact [DataProtectionOfficer@consignor.com](mailto:DataProtectionOfficer@consignor.com) .

Consignor LLC further commits to cooperate with the EU Data Protection Authorities and the Swiss Federal Data Protection and Information Commissioner and comply with the advice given by Data Protection Authorities and Commissioner regarding data transferred from EU/EEA and Switzerland.

Under certain conditions, an individual can invoke binding arbitration for complaints regarding Privacy Shield compliance not resolved by any of the other Privacy Shield mechanisms, for additional information: <https://www.privacyshield.gov/article?id=ANNEX-I-introduction> .

### **Data Processor**

Consignor LLC is a Data Processor and will process personal data only in a manner consistent with documented instructions from a Customer who is the Data Controller. Consignor LLC does not own the data that is processed on behalf of a Customer is bound by the instructions given by the Customer.

### **Personal Data Processed**

Consignor provides a software platform to enable our Customers to manage their shipping and delivery processes. The types of personal data could include the name, address, phone number and email of our Customers and their customers (to whom shipments are directed). In some cases, we also hold a brief description of what is contained in each shipment. For detailed description of Personal Data collected and/or processed by Consignor please visit <https://www.consignor.com/privacy-shield/> and read document "Personal Data – Consignor Platform US".

Limiting use. When we process Personal Information in the context of our Services, we only process and disclose the data as necessary to provide the Services. Our customers control how the information they upload to the Services is disclosed and used, and how it can be modified. Accordingly, if you wish



to request access, to limit use, or to limit disclosure of Personal Information uploaded to the Services by our customer, please contact the customer who submitted your data to our Services. If you provide us with the name of our customer that is processing your Personal Information, we will refer your request to that customer, and will support the customer as needed in responding to your request.

Right to Access. Data Subjects have the right to know what Personal Data about them is included in the databases. To request information about Personal Data, Data Subjects should submit a written request to [DataProtectionOfficer@consignor.com](mailto:DataProtectionOfficer@consignor.com). Where appropriate, Consignor provides you with the ability to correct, amend or delete that information.

Disclosure. Please be aware that Consignor may be required to disclose an individual's personal information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements.

### **Sub-processors**

Often third-party logistics and transportation service providers are utilized to complete shipping transactions requested by customers. For detailed description of sub-processors used by Consignor please visit <https://www.consignor.com/privacy-shield/> and read document "Supplier List – Consignor Platform US".

Onward transfer. Consignor provides Personal Data only to third-parties who reasonably need to know such data only for the scope of the initial transaction and not for other purposes. Consignor is liable for appropriate onward transfers of personal data to third parties.