

Notice of Self-Certification Under the EU-U.S. Data Privacy Framework, the UK Extension to the EU-U.S. Data Privacy Framework and the Swiss-U.S. Data Privacy Framework

Last Updated: August 28, 2024

Highspot Inc. (“Highspot”) complies with the principles of the Data Privacy Framework(s), as set forth by the U.S. Department of Commerce, in relation to personal data transferred to the United States from the European Union, UK and Switzerland. Specifically, Highspot has certified to the U.S. Department of Commerce that it adheres to (1) the EU-U.S. Data Privacy Framework with regard to the processing of personal data received from the European Union, (2) the UK Extension to the EU-U.S. Data Privacy Framework, with regard to the processing of personal data received from the United Kingdom (and Gibraltar), and (3) the Swiss-U.S. Data Privacy Framework with regard to the processing of personal data received from Switzerland (together, the “DPF”).

To learn more about the DPF program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

If there is any conflict between the terms in this notice and the DPF principles, the DPF principles shall govern.

Types of Personal Data Collected

Highspot provides a software as a service sales enablement platform (the “**Services**”) that our customers use to curate their sales and marketing content in one place, making it easier for sales and marketing teams to find and deliver the right customer content to their customers.

The types of personal data Highspot processes is therefore determined by the types of content the customer uploads to the Services, but typically includes names and business emails of your users, prospects and customers. It may also include (but not be limited to) personal data such as a user’s, prospect’s or customer’s name, email address, password (for users only), location, job title, professional skills, phone number, social media handle, picture, and other biographical or identifying information the customer chooses to provide.

When a customer or its users access or use our Services, we automatically collect information about their access or use, including log information and information collected by cookies and other tracking technologies (e.g. web beacons).

Purposes for Personal Data Collection and Use

Highspot processes personal data submitted by customers for the purpose of providing Highspot’s Services to them. Highspot may access personal data submitted by the customer to provide the Services, to correct and address technical or service problems, or to follow Highspot customer’s instructions, or as otherwise required by Highspot’s contract with the customer.

Inquiries and complaints

If you have any questions or complaints about our practices in relation to our participation in, or transfers of personal data under, the DPF, you can contact us by email at privacy@highspot.com.

If you have an unresolved concern in relation to our participation in, or transfers of personal data under, the DPF that we have not addressed satisfactorily, you may submit your complaint free of charge for resolution to:

- the panel established by the EU data protection authorities (DPAs) (for personal data received under the EU-US DPF),
- the UK Information Commissioner's Office (ICO) and the Gibraltar Regulatory Authority (GRA) (for personal data received under the UK Extension to the EU-US DPF), and/or
- the Swiss Federal Data Protection and Information Commissioner (FDPIC) (for personal data received under the Swiss-US DPF).

Highspot commits to cooperate with the panel established by the EU DPAs, the ICO, the GRA and/or the FDPIC, as applicable, and comply with their advice with regard to data transferred from the EU, UK (including Gibraltar) and/or Switzerland, as applicable.

If neither Highspot nor our dispute resolution provider resolves your complaint, you may have the possibility to engage in binding arbitration. Please review [Annex I](#) of the DPF for additional information.

Type of third parties to which data is transferred and purposes for transfers

Highspot uses a limited number of third-party service providers to assist us in providing our Services to customers. These third-party providers offer customer support to our customers, perform database monitoring and other technical operations, assist with the transmission of data, and provide data storage services. These third parties may access, process, or store personal data in the course of providing their services ("**Onward Transfers**"). Highspot maintains contracts with these third parties restricting their access, use and disclosure of personal data in compliance with the DPF principles.

Your rights to access, to limit use, and to limit disclosure:

EU, UK (including Gibraltar) and Swiss individuals have rights to access personal data about them, and to limit use and disclosure of their personal data. With our certification to the DPF program, Highspot has committed to respect those rights.

Because Highspot personnel have limited ability to access personal data our customers submit to our Services, if you wish to request access, to limit use, or to limit disclosure, please contact us at privacy@highspot.com and provide the name of the Highspot customer who submitted your personal data to our Services. We will refer your request to that customer and will support them as needed in responding to your request.

Investigatory and Enforcement Powers

With respect to personal data received or transferred pursuant to the DPF, Highspot is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission.

Disclosing personal data in response to requests

In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Liability for Onward Transfers

Highspot is responsible for the processing of personal data it receives, under the DPF, and subsequently Onward Transfers to a third party acting as an agent on its behalf. Highspot complies with the DPF principles for all Onward Transfers of personal data from the EU, UK (including Gibraltar) and Switzerland including the onward transfer liability provisions.