

LIMEADE COMMITMENT TO GLOBAL PRIVACY & DATA SECURITY

2018

OVERVIEW

As an employee engagement company, we've had a long-standing commitment to data privacy and data security because we handle company, employee and other critical data every day. This is no different for our global programs, which are also culturally relevant and adhere to global privacy and security laws.

This white paper outlines our:

- Privacy Policy
- Privacy Shield Certification
- GDPR Requirements
- Future GDPR efforts

“Privacy and protection of personal information is paramount for enterprises and their people. We recognize the need for our policies to align with international best practices and global data protection laws. Limeade values its global customers. We have an ongoing commitment to build trust with companies and their workforces by keeping their information protected and confidential.”

- Limeade Data Protection Officer and VP of Legal Faye Ricci.

PRIVACY POLICY

We're transparent with how we handle data because we want our users to understand how their data is used in a Limeade program. To ensure our users receive this information, we require them to review and consent to the [Terms of Service](#) and [Privacy Policy](#) before joining any Limeade program.

Our Privacy Policy outlines how we collect, share, and use data, which reflects other regulations outlined by HIPAA, Privacy Shield, GDPR, customer commitments, and our own desire to protect the privacy of our users. Our Terms of Service and Privacy Policy is reviewed and updated annually. These policies are also updated whenever laws and regulations applicable to Limeade change.

PRIVACY SHIELD

On November 16, 2017, Limeade was certified to the EU-U.S. [Privacy Shield framework](#). Although Privacy Shield certification does not equate to full compliance with GDPR, there are seven Privacy Shield principles that overlap with GDPR compliance. These seven privacy principles are:

- Notice
- Choice
- Accountability for Onward Transfer
- Security
- Data Integrity and Purpose Limitation
- Access
- Recourse, Enforcement, and Liability

For more information about Privacy Shield requirements and the framework for compliance, please visit <https://www.privacyshield.gov/article?id=Requirements-of-Participation>.

LIMEADE AND GDPR COMPLIANCE

The General Data Protection Regulation (GDPR) is a European Union (EU) law on data protection that became enforceable on May 25, 2018. This regulation imposes broad data privacy protections for people in the EU and applies to any company that collects or handles EU personal data, regardless of the company's location.

Since Limeade operates globally, we're committed to complying with GDPR. We're not only enhancing our current business practices around data privacy and security, we're also partnering with customers to comply with GDPR and other applicable laws and regulations within the Limeade platform.

GDPR REQUIREMENTS

Under GDPR, users have extensive rights around their data, including how it's being collected and used. Below are the rights of users and how Limeade is addressing them:

- **Right to be informed**

- Our [Privacy Policy](#) outlines how we collect, share, and use data, which reflects other regulations outlined by HIPAA, Privacy Shield, customer commitments and our own desire to protect the privacy of our users.

We're transparent with how we handle data and require that Limeade users review and consent to our [Terms of Service](#) and Privacy Policy before joining a Limeade program.

- **Right to access**

- Users can submit a request to Limeade to confirm that their data is being processed, what data is being processed, and what third parties have access to that data. If users have questions, comments or concerns, they're encouraged to reach out to their Limeade team or privacy@limeade.com.

- **Right to rectification**
 - o Limeade has an existing process in place for users to submit corrections around their data. At this time, they may request this change through our call center or support@limeade.com.
- **Right to erasure (also known as “right to be forgotten”)**
 - o Limeade has an existing process in place for users to have their data **completely** removed from the Limeade platform. At this time, they may submit this request through our call center or support@limeade.com.
- **Right to restrict processing**
 - o If a user no longer wants their data processed or used by the Limeade platform, they can request that their account be completely removed using the “Right to erasure” process listed above.
- **Right to data portability**
 - o Limeade Program Administrators and our support team can export data for users who request their data. The data is a set of standard CSV formatted files detailing relevant personal data.
- **Right to object**
 - o Limeade is committed to working with all customers and users to ensure we understand any objections to processing data. We alert users of this right in our privacy notice and will comply when asked. In the event a resolution cannot be met, Limeade has partnered with Better Business Bureau, a dispute resolution provider, to assist in these matters.
- **Rights related to automated decision making including profiling**
 - o We use data in the Limeade platform to tailor the experience and make the activities relevant and personalized for our users. Our research shows that users prefer and participate in programs that are more tailored to their needs. Any automated decision-making or profiling efforts to personalize the experience are the result of a coordinated effort between the Customer and

Limeade. This may include targeted challenges or activities based on (I) the user's employer, the user's Well-being Assessment scores, or the user's activity in the program and per contractual agreements or data provided while using the platform. If a Customer or user has additional questions, comments, or concerns about their data, please email privacy@limeade.com.

- **Privacy by design**
 - o Because of our ongoing commitment to data privacy, we have updated our agile development process to include data privacy impact assessments for each product roadmap initiative, from initial planning and design, all the way through release readiness and deployment. This includes reviewing any large or small feature that may impact security or privacy. For each, we complete a Security Review and Data Privacy Impact Assessment.

FUTURE GDPR EFFORTS

In addition to the existing controls and processes in place, Limeade is working to implement the following to continually improve:

- Ongoing security, HIPAA and GDPR training
- Creating a new cookie banner to notify users that Limeade uses cookies

REVISIONS

Revision	Date	Description
1.0	4/25/18	Initial draft
2.0	5/24/18	Major updates and release