



Ethical Advocate Privacy Policy

KJAS, Inc. (dba Ethical Advocate, EA) has a deep commitment to respecting and protecting your privacy. The EA Privacy Policy is designed to assist you in understanding how and when we collect and use the personal information you provide to us; and making informed decisions when using our site and our products and services. This Policy applies to our clients to whom we provide services, their employees and stakeholders, people who are interested in knowing about our services and to people submitting reports with respect to our clients.

We will use the information provided only for its purpose, to give you the information you need, or, if you are submitting a report, your organization the information you intend to provide them. We are committed to providing your organization with the information and processes it needs to address your concerns. We will not intentionally use your information for any unrelated financial gain.

The information EA collects from its clients and visitors to its Website located at www.ethicaladvocate.com and Websites hosted by the Company for its clients and affiliates is used only in the manner and for the purposes described in this Policy.

EA is not responsible for the accuracy of the content that is saved to any EA system by incident reporters or client company representatives, nor is EA responsible for the way its customers treat information included in reports. Users opt into providing information to our customers; any questions regarding customer use of this information should be directed to those organizations.

How Do We Use the Information That You Provide to Us?

Ethical Advocate is committed to protecting the privacy of anyone who enters our site for client hotline reporting, whether anonymous or not. We will not attempt to manipulate the information and data you submit in any way. Validated reports will remain in the original format, with only the ability to append, not change information. Such appends are clearly identified. Non-English language submissions will also be translated to English for reporting purposes.

Where allowed by law, our Client's employees and stakeholders who use our reporting can remain anonymous and not provide any personal information when reporting issues. If our Client's employees or stakeholders provide personal information when using the Company's reporting services, those individuals consent to the sharing of such personal information with our client in order for the Client to investigate claims as required by applicable laws. We do not provide data to any third parties other than those required by law or to fulfill client ethics service requirements.

EA hotline report information will never be sold, rented, traded, or leased.

EA may disclose personal information about you if it is required or permitted by law or legal process; in connection with legal or administrative proceedings; to protect the rights, reputation, property or safety of the Company or people associated with it; to defend or enforce its rights or our Client's legal obligations; or if the disclosure is required by mandatory professional standards.

Username and passwords are stored in our database for your use in our reporting system. This information is kept secure on our private servers and is only used to assist you in accessing your account as a client. You are the only person with this information. EA does not ask for personal



information when a person creates a username and password. This information is NOT released outside of the Ethical Advocate system. You must track this information as Ethical Advocate cannot provide reporters with username and password information.

System User Tracking

A cookie is a very small text document, which often includes an anonymous unique identifier. When you visit a Web site, that site's computer asks your computer for permission to store this file in a part of your hard drive specifically designated for cookies. Each Web site can send its own cookie to your browser if your browser's preferences allow it, but (to protect your privacy) your browser only permits a Web site to access the cookies it has already sent to you, not the cookies sent to you by other sites. Ethical Advocate does not manage cookies to track your internet use outside of the Ethical Advocate site.

Ethical Advocate does log system, application and website use while users are on the Ethical Advocate site. This usage is tracked to ensure user optimal system performance, for example to determine when system maintenance is best scheduled. If information, such as IP address, is collected, it is to maintain the security of our clients and the EA reporting application. Such information would only be released for this purpose, to address malicious activity, or if the law or court ordered required it.

Service Prospect Personal Information

You may provide us information about yourself, your firm or company, and your needs when requesting Ethical Advocate background and price quotations. We will use this information only as intended, to provide you with the information you need to make well-informed business decisions.

Email Information

If you choose to correspond with us through email, we may retain the content of your email messages together with your email address and our responses. This is intended only to meet your needs, our client needs, and the spirit of our agreements.

Information Access (including Third Parties)

No company other than Ethical Advocate and our contracted representatives is allowed to access information stored on our servers, unless formally authorized by Ethical Advocate as part of client reporting requirements. All client reporting areas are kept separate in their own secure area, allowing access of client authorized individuals only.

Ethical Advocate will not share your information with any unrelated third parties unless you request in writing or as required by law. No newsletter or mailing list companies are allowed to access your information, including your name, address, email, telephone, company name, title, position, or otherwise.

Unauthorized access to the Ethical Advocate system is a violation of the law. Website malicious use will be investigated to the full extent available by law. Ethical Advocate has placed security measures in place to prevent outside parties from accessing private information. In the event of a breach of security, Ethical Advocate will press charges to the fullest extent available.



Right to Personally Identifying Information

Individuals have a right to access their personally identifying information. Since most users are anonymous, do not identify themselves, and do not place personally identifying information in the Ethical Advocate system, these users are required to remember their username and password to access their account.

Privacy Shield

Ethical Advocate has elected to self-certify to the EU-U.S. Privacy Shield Frameworks administered by the U.S. Department of Commerce (“Privacy Shield”) and maintains a commitment to follow the EU-U.S. Privacy Shield Framework. Client ethics hotline reporting information is voluntary and is only used for the purpose intended. It is not shared with any unrelated third parties except under court order, if required by law, including to meet national security or law enforcement requirements. Ethical Advocate is liable for onward transfers to third parties.

Ethical Advocate complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce (<https://www.privacyshield.gov/welcome>) regarding the collection, use, and retention of personal information from European Union member countries. To learn more about the Privacy Shield program, and to view Ethical Advocate’s certification, please visit the U.S. Department of Commerce’s [Privacy Shield List](#).

If any personal data is provided in the Ethical Advocate ethics hotline system, it is for our clients’ use. This information is theirs to manage and requests about personal data should be directed to these organizations. We will respond to client requests for reporting data deletion on a timely basis, as required to meet these privacy requirements.

Ethical Advocate has certified that it adheres to the EU-U.S. Privacy Shield Framework of notice, choice, onward transfer, security, data integrity, access, and enforcement. Ethical Advocate is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

Ethical Advocate agrees to use the American Arbitration Association Dispute Resolution Requirements for disputes relating to Privacy Shield compliance. If you should have any questions, comments, concerns or complaints regarding this policy or a specific EA circumstance, email us at support@ethadv.com with the subject “EA Privacy Policy”. Please provide as much information as possible, including your name, questions, concerns, or complaints, and the best time, date and method (email, phone, etc.) to reach you. In certain conditions, an individual may invoke binding arbitration.

You may also contact us via postal service at Ethical Advocate, ATTN: Privacy Officer 1818 MLK Jr. Blvd, #258, Chapel Hill, NC 27514 USA. Ethical Advocate is committed to responding to such concerns on a timely basis. If a request involves client data, Ethical Advocate will contact the affected client and refer the concern for their management. In the event that your concern is not resolved after contacting us, you may file your complaint with the International Center for Dispute Resolution within the American Arbitration Association via the instructions available on their website at <https://www.icdr.org/privacyshield>.

Privacy Policy Effective May 2018