

## **EU-US Privacy Shield Framework**

GWF Associates, LLC complies with the EU-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries. GWF Associates, LLC has certified 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 policies in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>

GWF Associates, LLC collects data from registrants in our interactive programs on behalf of our clients and shares that data with clients so they can provide registrants with requested scientific information. The privacy of personal information provided through our programs is important to GWF Associates, LLC.

In cases of onward transfer to third parties of data of EU individuals received pursuant to the EU-US Privacy Shield, GWF Associates, LLC is potentially liable.

The following describes the type of information collected and its use, how information is protected and the choices available to participants.

The type of personal data requested of program participants who elect to register to receive scientific material generally involves identifying information including name, gender, and contact address such as office location or email. So that educational and promotional materials sent to registrants are optimally targeted, data such as specialty or areas of interest may be requested. Additional information may be provided voluntarily through answers to self-assessment or survey questions.

GWF Associates, LLC provides the data collected only to the client supporting the program. At no time does GWF Associates, LLC provide data to another party. If this policy changes in the future, GWF Associates will update this policy and provide opt-out choice to individuals prior to sharing their data with non-agent third parties. Appropriate electronic procedures and corporate confidentiality requirements are implemented to protect the security of data collected. Participants are clearly informed about the intent of data collection. Prior to registration, participants are informed that the personal details they provide may be used by the client for future marketing purposes. They are given the opportunity to opt out of receiving future communication at that time.

GWF Associates, LLC acknowledges the individual's right to access their personal data to review, correct, update or delete it. Individuals wishing to access their data may do so by contacting GWF Associates, LLC.

In compliance with the EU-US Privacy Shield Principles, GWF Associates, LLC commits to resolve complaints about your privacy and our collection or use of your personal information. European Union individuals with inquiries or complaints regarding this privacy policy should first contact GWF Associates, LLC at:

GWF Associates, LLC  
1 Sheila Drive  
Tinton Falls, NJ 07724  
+1-732-933-8780

GWF Associates, LLC has further committed to refer unresolved privacy complaints under the EU-US Privacy Shield Principles to BBB EU PRIVACY SHIELD, a non-profit alternative dispute resolution provider located in the United States and operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit [www.bbb.org/EU-privacy-shield/for-eu-consumers/](http://www.bbb.org/EU-privacy-shield/for-eu-consumers/) for more information and to file a complaint.

With respect to personal data received or transferred pursuant to the Privacy Shield Framework, GWF Associates, LLC is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, GWF Associates, LLC may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Under certain conditions, more fully described on the [Privacy Shield website](#), you may be entitled to invoke binding arbitration before the Privacy Shield Panel when other dispute resolution procedures have been exhausted.

### **US-Swiss Safe Harbor**

GWF Associates, LLC complies with the US-Swiss Safe Harbor Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from Switzerland. GWF Associates, LLC has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. If there is any conflict between the policies in this privacy policy and the Safe Harbor Privacy Principles, the Safe Harbor

Privacy Principles shall govern. To learn more about the US-Swiss Safe Harbor and to view our certification page, please visit <http://www.export.gov/safeharbor/swiss>.

In compliance with the US-Swiss Safe Harbor Principles, GWF Associates, LLC commits to resolve complaints about your privacy and our collection or use of your personal information. Swiss individuals with inquiries or complaints regarding this privacy policy should first contact GWF Associates, LLC at:

GWF Associates, LLC  
1 Sheila Drive  
Tinton Falls, NJ 07724  
+1-732-933-8780

GWF Associates LLC has further committed to refer unresolved privacy complaints under the US-Swiss Safe Harbor to an independent dispute resolution mechanism operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit [www.bbb.org/us/safe-harbor-complaints](http://www.bbb.org/us/safe-harbor-complaints) for more information and to file a complaint.