

## FloQast's Data Privacy Framework Notice

FloQast, Inc. ("**FloQast**", "**we**", "**our**" or "**us**") complies with the EU-U.S. Data Privacy Framework ("**EU-U.S. DPF**") and the UK Extension to the EU-U.S. Data Privacy Framework as set forth by the U.S. Department of Commerce. FloQast has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles ("**EU-U.S. DPF Principles**") with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. If there is any conflict between the terms in this Data Privacy Framework Notice and the EU-U.S. DPF Principles, the EU-U.S. DPF Principles shall govern. To learn more about the Data Privacy Framework ("**DPF**") program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

### 1. Types of Personal Data Collected and Purposes of Data Processing:

#### a. Personal Data Processed in the Course of Providing our Services:

FloQast provides an accounting workflow management software-as-a-service platform (the "**Platform**") and related technical support services (the "**Support Services**"). As used herein, the Platform and the Support Services are collectively referred to as the "**Services**." In providing the Services, FloQast acts as a data processor and our customers act as data controllers. FloQast and our customers' rights and obligations as a data processor or data controller, as applicable, are set forth in a written data processing agreement executed between FloQast and our customers ("**DPA**").

In providing the Services, FloQast processes personal data our customers and their users enter into the Platform or otherwise provide to FloQast in order for us to provide the Services. Although our customers have discretion to decide what data to submit (subject to any limitations in the applicable agreement between FloQast and a customer), the type of personal data processed in providing the Services is described in the applicable DPA and includes names, titles, work email addresses, work phone numbers and IP addresses of our customers and their users. FloQast processes personal data of our customers in accordance with the instructions of our customers and applicable laws, and as further set forth in the applicable DPA.

FloQast's Data Privacy Framework certification applies to personal data that our customers and their users provide to us from the European Union, European Economic Area and the United Kingdom (and Gibraltar) in the course of providing the Services, except where our DPA or other agreement with the applicable customer provides for a different transfer mechanism approved by the relevant authorities.

#### b. Personal Data Collected from Visitors of our Website:

FloQast's Data Privacy Framework certification also applies to personal data that we collect from visitors of our website. The types of personal data we collect and the purpose which we collect and use such personal data is further described in our [Website Privacy Notice](#).

## **2. Third Parties Who May Receive Personal Data:**

To provide the Services to our customers, FloQast uses a limited number of third party service providers to support the Services. These third party service providers offer infrastructure hosting, processing, monitoring and analytics, data transmission, data storage and customer support services. These third parties may access, process or store personal data while providing their services. FloQast may also share personal data we collect from visitors of our website with third parties as further described in our [Website Privacy Notice](#).

When transferring personal data to a third party service provider pursuant to the EU-U.S. DPF, FloQast maintains contracts with these third parties restricting their access, use and disclosure of personal data in compliance with our obligations under the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF, including the onward transfer provisions. If we have received your personal data in the United States and subsequently transfer that data to a third party acting as an agent, FloQast will remain liable if any such third party agent processes your personal data in a manner inconsistent with the EU-U.S. DPF Principles, unless we can prove that we are not responsible for the event giving rise to the damage.

## **3. Security**

FloQast takes reasonable and appropriate measures to protect the personal data submitted to us from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into account the risks involved in the processing and the nature of the personal data.

## **4. Compelled Disclosure:**

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

## **5. Access and Choice:**

If you are located in the European Union or United Kingdom, you have the right to request to access personal data that FloQast holds about you and request that we correct, amend or delete your personal data if it is inaccurate or processed in violation of the EU-U.S. DPF Principles. FloQast will give you an opportunity to opt out where personal data we hold about you is to be disclosed to an independent third party or used for a purpose that is materially different from those set out in this Data Privacy Framework Notice. If you would like to exercise any of your rights to access, limit use or limit disclosure of personal data, please contact FloQast at: [compliance@floqast.com](mailto:compliance@floqast.com).

## **6. Inquiries and Complaints:**

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF, FloQast commits to resolve DPF Principles-related complaints about our collection and use of your personal data. EU and UK individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S.

DPF should first contact FloQast at: [compliance@floqast.com](mailto:compliance@floqast.com). FloQast will respond within 45 days.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF, FloQast commits to refer unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF to JAMS, an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgement of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit <https://www.jamsadr.com/DPF-Dispute-Resolution> for more information or to file a complaint. The services of JAMS are provided at no cost to you.

Under certain conditions, you may have the possibility to invoke binding arbitration for complaints regarding our DPF compliance not resolved by any of the other DPF mechanisms. Further information on this process and the applicable requirements can be found here: <https://www.dataprivacyframework.gov/framework-article/ANNEX-I-introduction>.

#### **7. FTC Enforcement:**

The U.S. Federal Trade Commission has jurisdiction over FloQast's compliance with the EU-U.S. Data Privacy Framework and the UK Extension to the EU-U.S. DPF.