

NAVEX Global Data Privacy Transparency Report

NAVEX Global is committed to your privacy and being transparent about requests for customer data globally. This report provides information on information requests NAVEX has received. We publish a Transparency Report once per year disclosing the number of information requests for customer data that NAVEX Global receives.

NAVEX Global receives various forms of legal process requesting information from NAVEX Global. We require government and private entities to follow applicable laws and statutes when requesting customer information and data. Our legal team reviews every request to ensure that the requests have a valid legal basis. If a request does not have a valid legal basis, or if we consider it to be unclear, inappropriate, or overly broad, we challenge or reject the request.

NAVEX Global has never created a backdoor or master key to any of our products or services. We have also never allowed any government direct access to NAVEX Global servers and will not purposefully change our processes in a manner that facilitates government access to data.

Request for Customer Data Overview

In theory, U.S. authorities have broad authority under the Foreign Intelligence Surveillance Act of 1978 ("FISA"), Executive Order 12333 of Dec. 4, 1981 (46 FR 59941, 3 CFR, 1981 Comp., p. 200) ("EO 12333") and other federal laws and orders to obtain information from U.S. companies, including NAVEX Global, for national security or foreign intelligence purposes. However, based on the nature of our services, the types of personal data we process, and our history of requests received in the past, we believe we are unlikely to receive requests from U.S. authorities to obtain customer data for national security purposes or to participate in bulk surveillance programs. To this point, NAVEX Global has never received a FISA, EO 12333, or CLOUD Act request.

In recent years, NAVEX Global has received a limited number of formal requests for customer data from courts and agencies with investigatory authority. These requests have been made in the context of criminal investigations and civil actions and primarily by subpoena issued to NAVEX Global as a third party. When we receive such requests, we review the requests for lawfulness and to determine appropriate handling. NAVEX Global may challenge the request formally in court or informally through discussion directly with non-government parties (e.g., by directing non-government parties to get the information they seek directly from the other parties through discovery).

The types of personal information that may be disclosed may include, but are not limited to: name, job title, job position, location, employer, relationship with the organization, email address, telephone number, log-in credentials, and date of birth.

For whistleblower hotline and case management reports, the following may also be disclosed:

- » facts reported by a reporter about a suspected violation, including how and where the suspected violation occurred and how the reporter learned about the suspected violation;
- » identity, function and contact details of individuals allegedly involved in the suspected violation; and
- » identity, function and contact details of individuals who could provide information relating to the suspected violation

Information Requests - Government

Government information requests include both emergency and routine legal demands for information issued by law enforcement and other government agencies.

Year	# of Requests	Identity of Authorities	Location of Data Subjects
2010	2	United States Department of Justice	United States
		United States Department of Homeland Security	United States
2011	0	-	-
2012	0	-	-
2013	1	United States Department of Justice	United States
2014	0	-	-
2015	0	-	-
2016	1	Federal Bureau of Investigations	United States
2017	0	-	-
2018	0	-	-
2019	0	-	-
2020	3	City of Chicago	United States
		US Army Criminal Investigation Command	United States
		United States Department of Justice	United States, China
2021	1	Federal Bureau of Investigations	United States

Information Requests – Private Parties

NAVEX Global receives requests for customer data from non-governmental private parties. These typically include information requested in civil actions.

Year	# of Requests	# of Customer Accounts Specified	Location of Data Subjects
2010	1	1	United States
2011	2	1	United States
2012	5	1	United States
2013	3	1	United States
2014	5	1	United States
2015	6	1	United States
2016	9	1	United States
2017	5	1	United States
2018	8	1	United States
2019	6	1	United States
2020	6	1	United States
2021	7	1	United States

ABOUT NAVEX GLOBAL

NAVEX Global is the worldwide leader in integrated risk and compliance management software and services. Our solutions are trusted by thousands of customers around the globe to help them manage risk, address complex regulatory requirements, build corporate ESG programs and foster ethical workplace cultures. For more information, visit www.navexglobal.com.