Notice of Certification under the EU-U.S. Privacy Shield Framework

This policy

CaféX Communications Inc. and its affiliates (the "Company," “We” or “Us”) offer a hosted service that enables our business customers (“Customers”) who subscribe to our communication technology and/or other engagement technology services (“Online Services”) to better communicate and interact with, and deliver content to, visitors to their websites and other prospective customers (“Users” or “You”) in real-time via co-browse, voice, video and other communication and delivery methods.

EU-U.S. Privacy Shield

We comply with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, processing, use, and retention of personal data transferred from the European Union to the United States. We have certified to the Department of Commerce that we adhere to the Privacy Shield Principles. If there is any conflict between the terms 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, please visit: https://www.privacyshield.gov.

Sharing Data with Third Parties

We use a limited number of third-party partners and service providers to assist us in making our websites and the Online Services available. These partners and service providers may access, process or store personal data in the course of providing their services (such as credit card processing services). We only share personal information with partners and service providers that show an equally strong commitment to privacy and security. We also maintain contracts restricting the use and disclosure of personal data. If one of these partners or service providers processes personal data in a manner inconsistent with the Privacy Shield Principles, we will be liable unless we can prove that we are not responsible for the event giving rise to the damage.

Note, however, that we may need to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Information We Collect

When subscribing to the Online Service, We request information in a sign-up form to facilitate the Online Service such as name, postal address, e-mail address or telephone number. This is information we need, for example, to process a payment or enabling software components.

We may also collect internet connection information such as IP address, equipment used (such as which browser or mobile device) and usage details. We also use cookies and other technologies to collect and store information that is generated automatically as You use the service, including Your preferences and anonymous usage statistics.

When using the Online Service, chat transcripts, emails, and other written communication between Customers and User are stored. Additionally, Users may be asked to complete a survey, a copy of which is stored, in order to allow us (including our third party service providers) and our Customers to obtain valuable feedback. Co-browsing information, such as screenshots, is not stored. We may also log technical metadata about the Online Service such as IP addresses of or software used by Users and Customers’ Agents.

Please see our privacy policy located at http://www.liveassistfor365.com/en/policies/privacy-policy/ for a further description of information we collect and how it is used.
Rights to Access, Limit Use and Limit Disclosure

EU individuals have rights to access personal data about them, and to limit use and disclosure of their personal data. Because our personnel have limited ability to access personal data our Customers submit to the Online Services, if a User wishes to request access to or to limit use and/or disclosure of his/her/its personal data, please contact Us at compliance@cafex.com with the name of Our Customer through which the User used the Online Services. We will refer the request to that Customer, and will support them as needed in responding to the request.

Inquiries, Enforcement and Resolution

In compliance with the US-EU Shield Principles, we commit to resolve complaints about the privacy and our collection or use of the personal information of EU individuals. If You believe We retain Your personal data within the scope of our Privacy Shield certification, You may direct any queries or complaints regarding our Privacy Shield certification or compliance to the address above. We will respond to any inquiries or complaints within 45 days at no cost to You.

If You feel we failed to provide an adequate response, you may contact (https://www.jamsadr.com), which provides an independent third-party dispute resolution mechanism. Under certain conditions more fully described on the Privacy Shield website, you may be entitled to invoke binding arbitration through the Privacy Shield Panel when other dispute resolution procedures have been exhausted.

We are subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission with respect to personal data received or transferred pursuant to the EU-U.S. Privacy Shield Framework.

Last Modified 2017-08-30 Rob Hill (Information Security Officer)