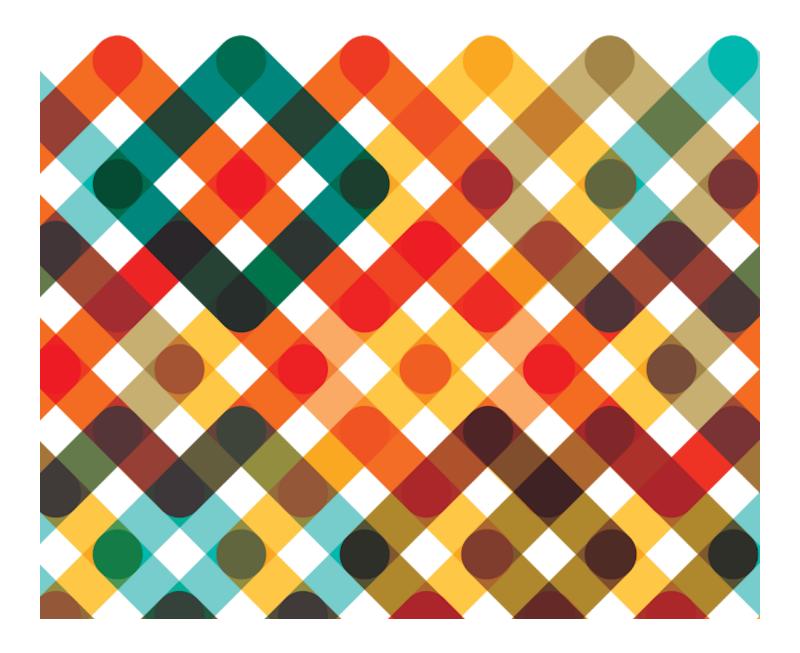


# Credly's Privacy Overview

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# Overview

Introduction What is Credly? How does Credly process data? What personal information does Credly collect from issuers? What privacy settings are available to earners? What is Credly's data retention policy? Where is customer data stored? How long are credentials hosted? Can issuers download issuer data at any time? How does Credly comply with privacy laws? What security measures does Credly maintain? Additional resources

# Introduction

Credly was founded to help people get recognition for their skills, to connect their verified abilities to opportunities, and to bring happiness, equity, and access to every member of the current and future workforce. That mission aligns with a larger global trend of empowering individuals with control over their own data. Our policies and processes operationalize that commitment to ensuring the security and privacy of our customers and their employees, members, learners, and users. We invest in best practices and compliance with industry standards. All Credly employees are trained in data security and privacy principles.

# What is Credly?

Credly sells subscription access to its Software as a Service platform. Credly's software platform allows organizations (Credly's customers) to issue digital credentials—official recognition in a data-rich, structured format--to individuals (typically that organization's employees, members, certification holders or students). In some cases, Credly sells professional services to organizations to help them set up or improve their recognition systems.

#### How does Credly process data?

- Issuer Creates Credentials Templates. Client organizations (the credential Issuer) define resume-worthy achievements and the criteria for demonstrating the particular set of knowledge, skills, and abilities that the credential recognizes. The Issuer can then create templates for credentials that recognize these achievements using the Credly System.
- Issuer Issues Credentials. After creating the credential template, the issuer can then issue credentials to
  earners by entering the first name, last name, and email address of the individual earning the credential
  (the Earner) into the Credly System. At this stage, the personal information of the Earner is known as
  Issuer Data and Credly is acting as a processor of the Issuer Data, while the Issuer is the controller of the
  Issuer Data.
- Credly System Notifies Earners of the Issued Credential. Earner receives an email notifying them that they have earned another Credential and prompting them to accept the Credential.
- Earners Require an Account to Accept Credentials. If the Earner has not already created an account on the Credly System, they must create an account on the Credly System to accept Credentials. By creating an account on the Credly System, the Earner must agree to the Earner Terms of Service, available online at <a href="https://info.credly.com/earner-terms-of-service">https://info.credly.com/earner-terms-of-service</a>. After the Earner has created an account on the Credly System, the Earner's personal information is known as Earner Data and is no longer Issuer Data. At this stage, Credly is the controller of the Earner Data and the Issuer has no obligation or liability with respect to the Earner Data.
- Earners Manage their Account and Control Earner Data. Earners earn Credentials from a variety of Issuers and have complete control over their personal information and accounts. Earners have the option to add any biographical information they wish to include (e.g. LinkedIn and Twitter handles, personal websites and biographical blurbs). Earners may request the irreversible deletion of individual Credentials or their entire account at any time.

#### What personal information does Credly collect from Issuers?

Credly collects the **first name, last name, and email address** of the credential earner, in addition to the specific Credential earned. Credly does not collect or process any sensitive personal information like social security numbers, financial information, or personal health information.

#### What privacy settings are available to Earners?

Earners can set their accounts or individual credentials to be private or publicly visible; credential earners may delete credentials on an individual basis and can request at any time the irreversible deletion of all personally identifiable data held by Credly about them.

# What is Credly's Data Retention Policy?

Issuers may delete Issuer Data at any time during their Credly subscription. After termination of the Issuer's Credly subscription, Credly will irreversibly and permanently delete all remaining Issuer Data. Credly's Data Retention Policy is available upon request.

Credly will also delete Earner Data upon request from the Earner.

#### Where is Issuer Data stored?

Credly stores all Issuer Data in the United States. After entering into the Credly System, Issuer Data never leaves the United States.

# How long are Credentials hosted?

Credly believes that Credentials have value only when they have permanence and reliability, so Credly has the ability to host Credentials indefinitely, with the exception that Credly will remove Credentials if:

- 1. The Earner requests that Credly remove their Credential or delete their personal information
- 2. The Earner violates the Credly Earner Terms of Service
- 3. A legal tribunal orders that Credly remove the Credential or data relating to a particular Earner

Issuers have the ability to revoke Credentials that they have issued during the term of their subscription. Issuers may also issue Credentials with a fixed expiration date.

# Can Issuers download Issuer Data at any time?

Yes. Issuers can download all of their data at any time during their subscription. All data relating to digital credentials is provided in a .CSV file and in the Open Badge Standard, which is the industry standard for digital credentials.

# How does Credly comply with privacy laws?

When Credly acts as a processor, Credly complies with privacy laws by only processing Issuer Data in compliance with the Issuer's instructions (as defined in the Agreement with Credly) and forwarding all data subject requests to Issuer. Credly also maintains a state-of-the-art security program that ensures the confidentiality, availability, and integrity of Issuer Data.

When Credly acts as a controller, Credly complies with privacy laws by only processing Earner Data in accordance with the Earner's consents and wishes. Earners consent to Credly processing their personal information by agreeing to the Credly Earner Terms of Service when they create an account. The Credly Earner Terms of Service are available online at: <u>https://info.credly.com/earner-terms-of-service</u>. The Credly Earner Terms of Service also incorporates Credly's Privacy Policy, available online at: <u>https://www.youracclaim.com/privacy</u>.

Credly is certified to both the US-EU Privacy Shield and the APEC Privacy Framework.

# What security measures does Credly maintain?

Credly maintains an ISO27001-compliant security program. More information on Credly security compliance practices can be found on <u>Credly's website</u>.

#### Additional resources

Publicly Available

- Data Privacy & Security Credentials
- Security Controls Summary
- GDPR FAQ
- Privacy Policy
- Uptime Reporting

# Videos & Podcasts

- Video: What Happens to Your Data When You Issue Digital Credentials
- Podcast: <u>What Does it Take to have Enterprise Level Security</u>

Available under Non-Disclosure Agreement

- Penetration Testing Results
- Data Security Policies & Procedures
- Business Continuity and Disaster Recovery Plans and Test Results
- Completed Higher Education Community Vendor Assessment Toolkit (HECVAT)
- Completed Vendor Security Alliance (VSA) Questionnaire