
Docebo Privacy Shield Notice

Dear Customer

Data privacy and data security are amongst our highest priorities at Docebo, and we continually monitor data privacy and data security industry developments to advance our protections for our customers based on these developments.

On July 16, 2020, the Court of Justice of the European Union (CJEU) issued a ruling invalidating the EU-US Privacy Shield as a valid means of transferring personal data from the EU to the US. To be clear, this ruling does not change your ability to transfer data between the EU and the US using the Docebo LMS Platform.

Prior to the CJEU's decision, Docebo provided customers with overlapping protections using both the EU - Standard Contractual Clauses (SCCs) and the Privacy Shield frameworks for data transfers under our Data Protection Addendum (DPA). While the CJEU's decision invalidated the EU-US Privacy Shield for data transfers, *the SCCs remain valid*. Therefore, our customers are still protected via the SCCs.

Despite our overlapping protections, our team moved quickly to revise our DPA language to further clarify how the SCCs will automatically apply for transfers of data from the EU given the CJEU's decision. As a team, we also acknowledge that the CJEU stated that the suitability of data transfers under the SCCs may be challenged on a case-by-case basis, and supplementary measures may be necessary to ensure an adequate level of protection. The CJEU did not, however, clarify what those supplementary measures might be. Relatedly, the European Data Protection Board continues to analyse the Court's decision and expects to issue further guidance on what those supplementary measures could consist of. We also anticipate that the European data protection authorities will also issue further guidance in due course.

Data privacy and data security are ongoing, evolving topics and we anticipate further change. Our focus remains on staying up to date with the most recent developments and providing our customers with responses that reflect them. Your trust is important to us, and we will continue to prioritize transparency around our practices.

Docebo Compliance Team