

# Limelight’s U.S.-E.U. Privacy Shield Framework Statement

## Policy Statement

Limelight Networks (“Limelight,” “we,” “us,” or “our”) participates in and has certified compliance with the EU–U.S. Privacy Shield framework and the Swiss–U.S. Privacy Shield framework regarding the collection, use, and retention of personal data transferred from European Union member countries and Switzerland (the “Principles”). To learn more about the Privacy Shield, and to view Limelight’s notices of self-certification, please visit the [Privacy Shield website](#). We are subject to the investigatory and enforcement powers of the Federal Trade Commission.

## Scope

Limelight’s services are used by businesses seeking to deliver faster websites, more responsive applications, the highest quality video, and consistent game and software downloads to their customers’ devices. Our primary services enable our customers to deliver digital content to individuals who desire to access such content. For example, if an individual accesses a news video from one of our media customers’ websites, that video content is delivered across our content-neutral transitory network to that individual. Put differently, we are a conduit by which our business customers deliver their digital content to their end users for consumption.

This Privacy Statement describes the standards pursuant to which we treat information relating to an identified or identifiable natural person who is a citizen of the EU or Switzerland (“personal data”) that is transferred between the EU or Switzerland to the U.S. through the use of our services, or access to our website. For transfers between EU or Switzerland and non-U.S. countries, we may rely on EU standard contractual clauses or other acceptable compliance mechanisms. For more detailed information of our privacy practices, please see our [Privacy Policy](#).

## Purpose

We process our customers’ digital content in accordance with instructions and permissions given to us by our business customers. Our business customer fully controls and is responsible for the content that it permits to be delivered using our network. We have no control over our customer’s content that is delivered over our network, and we have no direct relationships with the individuals whose personal information our customers may ask that we process on their behalf. In providing our services and solutions, we collect information pertaining to the delivery of these services to our customers, which could include personal data, or in combination with other data, be used to identify individuals. This information is primarily used by us to provide,

maintain, enhance, and protect all of our services and features, to allow us to charge and invoice our customers, and to enforce our terms of service. If the information we collect can be used to identify an individual by itself, or in combination with other information, we treat such information as personal data. However, where we merely transmit, route, switch, or cache digital content on behalf of our business customers, we will rely on our business customers to comply with the legal requirements underlying the Principles with respect to the processing of such digital content.

We use information submitted to us as part of applications for employment or for partner candidates to evaluate your qualifications for the positions sought. We may rely on Privacy Shield to enable employment relationship activities, such as processing human resources, benefits, and payroll data of our existing, potential, or former employees from the EU.

## **Disclosure to Third Parties**

We may share personal information with third party service providers for general business purposes. For example, we may utilize third party payroll and benefits providers, or third parties to assist with contract management or marketing activities. We require that these parties process such information in compliance with this Statement. We maintain contracts with these parties that authorize only a limited use of and limited access to such information, and we require these parties to use commercially reasonable physical, managerial, and technical safeguards to preserve the integrity and security of such information. We may disclose personal information if required to do so by law or in the good-faith belief that such action is necessary to comply with any applicable state and / or federal laws and regulations (such as U.S. copyright law), or respond to a court order, judicial or other government subpoena warrant, or legal process in the manner required by the requesting entity. If we transfer personal information received under the Privacy Shield to a third party, the third party's access, use, and disclosure of the personal data must also be in compliance with our Privacy Shield obligations, and we will remain liable under the Privacy Shield for any failure to do so by the third party unless we prove we are not responsible for the event giving rise to the damage.

## **Choices**

EU and Swiss data subjects have rights to access personal information about them and to limit the use and disclosure of such data. We are committed to respect these rights. We maintain access controls in place that limit most employees' ability to access personal data. If data subjects want to update, correct, or delete their information and preferences, or request the removal of their information from publicly available areas, they may do so by sending us a [request](#). In some cases, we may not be able to remove the personal information, in which case we will let the data subject know that we are unable to do so and why.



## Contact Information

Please contact us with any questions or comments about this Privacy Shield Statement, your personal information, and our third-party disclosure practices.

Attention: Privacy Shield  
Limelight Networks  
222 South Mill Street, Suite 800  
Tempe, AZ 85281  
(602) 850-5000  
Email: [privacy@llnw.com](mailto:privacy@llnw.com)

We endeavor to respond to inquiries within 30 days. However, we also commit to refer unresolved Privacy Shield complaints to JAMS, an alternative dispute resolution provider located in the U.S. If you do not receive timely acknowledgment of your Privacy Shield complaint from us, or if we have not addressed your Privacy Shield complaint to your satisfaction, please contact or visit <https://www.jamsadr.com/eu-us-privacy-shield> for more information or to file a complaint. Complaining parties may also, in absence of a resolution by Limelight and JAMS, seek to engage in binding arbitration through the Privacy Shield Panel. If you are a current, former, or prospective employee whose inquiry concerns human resource-related data, and your Privacy Shield complaint remains unresolved, please contact the EU data protection authorities (“DPA”) by visiting [here](#). The services of JAMS or the DPA are provided at no cost to you.

## Effective Date, Date Last Modified

Effective date April 9, 2018; Statement last modified on June 24, 2019.