

**ACCO Brands’ participation in the EU-US Privacy Shield Framework**

ACCO Brands Corporation and its wholly owned subsidiaries that are incorporated in any state or territory in the US (collectively, “ACCO Brands”) recognize that Europe has established strict protections for the processing of European personal data, including the requirements to provide adequate protection for such data when transferred outside the European Economic Area (“EEA”). To provide adequate protection for all personal data received from the EEA, ACCO Brands has elected to self-certify to the EU-U.S. Privacy Shield Framework, as operated by the U.S. Department of Commerce (“Privacy Shield”).

Our certification can be found here. A full list of companies who have self-certified with the Privacy Shield is available at <https://www.privacyshield.gov/list>.

**1 ACCO Brands' commitment to the Principles**

ACCO Brands commits to comply with the EU-U.S. Privacy Shield Principles (“Principles”) with respect to all personal data that we receive from the EEA. Individuals whose personal data is received by ACCO Brands from other non-EEA jurisdictions do not have the rights set out in this Statement.

**2 Types of personal data collected**

 The types of personal data collected are set out in the section titled "*Collection of data and personal information*" under the [Privacy Policy](https://www.accobrands.com/us/us/2410/privacy-policy).

**3The purposes for collection and use**

 The purposes for collection and use is set out in the section titled: "*How we use your information*" under the [Privacy Policy](https://www.accobrands.com/us/us/2410/privacy-policy).

**4Types of third parties to whom we disclose personal data and purposes for disclosure**

 The types of third parties to whom we may disclose personal data is set out in the section titled "*How we share your information*" under the [Privacy Policy](https://www.accobrands.com/us/us/2410/privacy-policy).

**5 Choice**

 If you do not wish ACCO Brands to pass your personal data to a third party who subsequently uses your data for its own purposes, you can contact us via the details set out in **Contact us** below.

**6 Accountability for onward transfer**

Where required by the Principles, we will enter into written agreements with third parties requiring them to provide the same level of protection the Privacy Shield requires and limiting their use of the data to the specified services provided on our behalf.

Under certain circumstances, we may remain liable for the acts of our third party agents or service providers who perform services on our behalf for their handling of EU personal data that we transfer to them.

**7 Security**

ACCO Brands maintains reasonable and appropriate measures to protect personal data from loss, misuse and unauthorised access, disclosure, alteration and destruction, taking into due account the risks involved in processing and the nature of the personal data.

**8 Data Integrity and Purpose Limitation**

ACCO Brands limits the collection, usage and retention of information to that which is relevant for the intended purposes for which it was collected, and takes reasonable steps to ensure that all data are reliable, accurate, complete and current.

**9 Access**

 You have certain rights under the Principles to access the personal data about you that ACCO Brands processes. To access such personal data, please make a request in writing to the contact details set out in **Contact us** below. We will respond to your request in accordance with the Principles.

**10 FTC's investigatory and enforcement powers**

ACCO Brands' commitments under the Privacy Shield, and compliance with the Principles, are subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission.

**11 Complaints**

If you have any complaint regarding ACCO Brand's compliance with the Principles, please contact us using the details set out in **Contact us** below. We will respond to your complaint within 45 days.

**12 Independent dispute resolution body**

If you feel that ACCO Brands has not satisfactorily resolved your complaint or has failed to respond to your complaint within 45 days, you may bring your complaint to the attention of your local data protection authority (“DPA”). The DPAs will establish a panel to act as an independent dispute resolution body who will investigate and resolve complaints brought under the Privacy Shield free of charge to you. ACCO Brands commits to cooperate with this panel as an independent body to resolve disputes relating to its compliance with the Principles. ACCO Brands will comply with any advice given by DPAs where they take the view that specific action is necessary to comply with the Principles and will provide the DPAs with written confirmation that such action has been taken.

You can find the details of your local DPA [here](http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm).

**13 Document Revisions**

 This Statement may be revised from time to time to reflect changes in data privacy laws, regulations and requirements. All revised Statements will be published here.

**14 Contact us**

If you have any questions about our adherence to the Principles or our participation in the Privacy Shield, please contact us:

Email: DataPrivacy@acco.com