



# EU Privacy Shield

## PROCEDURE REPORT



Compliance Activities and Casework  
Conducted by the BBB EU Privacy Shield Program  
from August 1, 2018 through July 31, 2019



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# EXECUTIVE SUMMARY

The period covered by this report, August 1, 2018 through July 31, 2019, constituted the third year of BBB EU Privacy Shield (BBB EUPS) operations. The program was launched in 2016 as an Independent Recourse Mechanism supporting the Privacy Shield Frameworks. It provides both independent dispute resolution and compliance assistance to participating companies.

Key program activities during this review period included:

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Continuing to assist participants and new applicants in aligning their privacy policies and self-certifications with the requirements of Privacy Shield;

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Managing a significant spike in participation following implementation of the EU General Data Protection Regulation (GDPR); and providing educational resources for current participants as they updated their privacy policies and practices in alignment with GDPR;

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Assisting companies with adapting to changes in administrative procedures implemented by the Department of Commerce; and

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Handling the first eligible complaints received by the program under Privacy Shield.

# YEAR IN REVIEW

**Participation.** BBB EUPS increased enrollment during the review period to more than 1,100 self-certified participants as of July 31, 2019.

**Outreach.** BBB EUPS publishes periodic participant newsletters and online Privacy Shield compliance guidance for program applicants and participating businesses. Members of program staff also speak and write routinely on privacy topics, including Privacy Shield. In the past year, in collaboration with other BBB National Programs staff, BBB EUPS submitted comments to the Federal Trade Commission and the National Telecommunications and Information Administration presenting Privacy Shield as a model for co-regulation in the field of data privacy. BBB EUPS also began producing podcasts for those in the business audience who prefer to receive compliance guidance in audio form. These resources can be found at [BBBprograms.org/programs/bbb-privacy-shield](https://www.bbbprograms.org/programs/bbb-privacy-shield).

**Compliance Activities.** BBB EUPS continues to provide all program applicants with privacy policy guidance and assists as needed with self-certification and recertification. The program also monitors participants' online privacy policies and Privacy Shield self-certifications on an ongoing basis for changes that may affect compliance and provides automatic reminders to companies before their self-certifications are due for renewal.

**Complaint Handling.** The program received 1,053 submissions from individual consumers worldwide including 200 from the EU and Switzerland, through the BBB EUPS online complaint form. Following a review of each complaint by program staff, all but eight complaints were determined to be ineligible for resolution by the program for one or more of the following reasons: they concerned companies not enrolled in BBB EUPS; they did not involve data collected in the EU or Switzerland; they were unrelated to privacy (i.e., product or service complaints); or they failed to state a complaint. Of the remaining complaints, five were dropped by complainants before eligibility could be established. A total of two complaints were resolved through the BBB EUPS conciliation process. One complaint is still pending at the end of the review period.

MORE THAN  
**1,100**  
SELF-CERTIFIED  
PARTICIPANTS AS  
OF JULY 31, 2019

**1,053**  
COMPLAINTS  
RECEIVED FROM  
INDIVIDUALS  
WORLDWIDE

**200**  
COMPLAINTS  
RECEIVED FROM  
INDIVIDUALS  
IN THE EU AND  
SWITZERLAND

**8**  
ELIGIBLE  
COMPLAINTS  
ADDRESSED

# ABOUT THE PRIVACY SHIELD FRAMEWORKS

On July 12, 2016, the U.S. Department of Commerce and the European Commission announced the launch of the EU-U.S. Privacy Shield Framework for transatlantic data flows to replace the U.S.-EU Safe Harbor, which was invalidated by a decision of the European Court of Justice in October 2015. While retaining many elements of Safe Harbor, Privacy Shield includes enhanced consumer privacy protections for EU individuals, promotes greater transparency around data collection, use, and sharing, and helps U.S. companies demonstrate that their privacy practices meet EU data protection requirements.<sup>1</sup>

On January 12, 2017, the Swiss Government approved the Swiss-U.S. Privacy Shield Framework as a valid legal mechanism for U.S. organizations to comply with Swiss data protection requirements when transferring personal data from Switzerland to the United States. The U.S. Commerce Department began accepting self-certifications for this Framework on April 12, 2017.

Organizations participating in either Privacy Shield Framework must submit a self-certification application to the Department of Commerce, stating their adherence to the Privacy Shield Principles for personal data they receive from the EU or Switzerland. Participating companies are required to maintain a current self-certification on the official EU-U.S. or Swiss-U.S. Privacy Shield

Lists maintained by the Department of Commerce. Each participating company must also contribute to the Arbitral Fund, which supports the operation of the Annex I arbitration mechanism for residual complaints that remain unresolved by multiple redress mechanisms.

Participants must also verify on an annual basis that their public attestations regarding their Privacy Shield privacy practices are accurate, through self-assessment or outside compliance reviews; and must designate an independent dispute resolution option—also called an Independent Recourse Mechanism or IRM—to handle privacy complaints from EU and Swiss individuals whose personal data they process.

The objectives of this co-regulatory program are to ensure that **privacy concerns of individual complainants are addressed**

expeditiously and fairly and to

**promote privacy accountability among participating businesses.**

<sup>1</sup> The Commission Decision on the adequacy of the protection provided by the EU-U.S. Privacy Shield applies to the 28 EU member states, and also to Iceland, Liechtenstein, and Norway. Thus, references in this report to the European Union (EU) should be read as including Iceland, Liechtenstein, and Norway.

## ABOUT BBB EU PRIVACY SHIELD

BBB EU Privacy Shield was established in 2016 as a successor program to BBB EU Safe Harbor, which had operated as an Independent Recourse Mechanism since 2000. The program provides compliance assistance for U.S. businesses preparing for self-certification under the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks, as well as ongoing review of the Privacy Shield statements and certifications of the program's participating businesses and up-to-date guidance on privacy compliance. At its core, BBB EUPS operates an independent third-party dispute resolution mechanism enabling European Union and Swiss individuals to resolve Privacy Shield complaints against participating businesses. The objectives of this co-regulatory program are to ensure that privacy concerns of individual complainants are addressed expeditiously and fairly and to promote privacy accountability among participating businesses.

In its third full year of operating under the Privacy Shield Frameworks, BBB EUPS provided its services to more than 1,100 businesses.

This annual report summarizes the ongoing compliance activities and casework of the BBB EUPS program spanning August 1, 2018 through July 31, 2019.

### **BBB EU PRIVACY SHIELD CORE REQUIREMENTS**

Each U.S. business that applies to join BBB EU Privacy Shield provides the program with a draft copy of the consumer-facing Privacy Shield-compliant privacy policy that it will post on its public website once it is self-certified under Privacy Shield. BBB EUPS staff reviews the privacy policy for basic compliance with Notice Principle requirements. Notably, BBB EUPS staff ensures that the draft privacy policy includes clear instructions for EU and Swiss individuals who wish to contact the business with Privacy Shield complaints and inquiries, as well as a live hyperlink to the BBB EU Privacy Shield consumer information web page and online complaint form.

In its third full year  
of operating under  
the Privacy Shield  
Frameworks,

**BBB EUPS  
provided  
services  
to more  
than 1,100  
businesses.**

### ***Participation Requirements***

Each BBB EU Privacy Shield participant is required:

- To upload the privacy policy approved by BBB EUPS to the Department of Commerce website during the self-certification process and, following Commerce Department approval, to post and maintain the privacy policy on all company websites to be covered by Privacy Shield;
- To notify BBB EUPS of all changes to the approved policy, including any changes required by the Department of Commerce during the self-certification process, and to provide BBB EUPS a copy of the updated and posted policy;
- To apply promptly for self-certification with the Department of Commerce following acceptance into the BBB EUPS program, and to maintain a current self-certification for the duration of its participation in BBB EUPS;
- To cooperate with BBB EUPS staff to respond to privacy complaints in accordance with the BBB Procedure Rules;
- In cases sent to a Data Privacy Review before an independent Data Privacy Panelist, to accept the Panelist's final decision; and
- To implement any corrective action agreed to as part of a settlement, or mandated by a Panelist's decision.

Each participant executes a Participation Agreement that is renewable annually following a BBB EUPS staff review of the company's online Privacy Shield privacy policy and self-certification listing to ensure that the company remains in compliance with all program requirements.

### ***Review of Privacy Policies/Practices***

BBB EU Privacy Shield staff examines each applicant's draft public privacy policy for inclusion of all elements required by the Privacy Shield Notice Principle and consistency with the rest of the Privacy Shield Frameworks. In addition, staff reviews any other relevant published policies or referenced terms and conditions for consistency. Applicant companies can access detailed resources about the Privacy Shield Principles and the self-certification process on the program website at **[BBB.org/EU-privacy-shield/privacy-policy-requirements](https://www.bbb.org/eu-privacy-shield/privacy-policy-requirements)**. We provide additional privacy policy guidance and tips for our participating businesses during the application process.

This guidance helps each participating business to:

- Ensure that its privacy policy is clearly written and is readily accessible on the company's public website.
- Ensure that it clearly identifies the corporate entity or entities processing EU or Swiss personal data pursuant to Privacy Shield. If a brand name or d/b/a is used on the company's public website(s), the company's legal name should also appear in the policy, in its self-certification, and also in the BBB EU Privacy Shield Participation Agreement. This information can facilitate a consumer's search for the appropriate company on the official Commerce Department Privacy Shield List and in the BBB EU Privacy Shield complaints system.
- Where multiple entities and web domains are to be covered by a master corporate privacy policy, ensure that each covered website includes the correct policy and the active hyperlink to the BBB EU Privacy Shield consumer pages and complaint system.

# COMPLIANCE ACTIVITIES AND KEY ISSUES 2018-19

Organizations enrolling in BBB EU Privacy Shield during the period of review ranged from large multinational corporations to small and mid-sized businesses across multiple industry sectors. Applicants seeking self-certification assistance from BBB EU Privacy Shield were closely engaged in adapting their public and internal privacy policies and practices to meet new transparency and compliance obligations, and in many cases, seeking to align their policies and practices with GDPR requirements.

## *GDPR Implementation*

The May 2018 implementation of GDPR sparked renewed interest among U.S. businesses in Privacy Shield and prompted BBB EUPS to offer additional guidance and resources to program participants.

Though BBB EUPS does not provide individualized GDPR services beyond our Privacy Shield services, the program is making ongoing efforts to provide our applicants and participants with accurate information about the changes in EU privacy law brought about by GDPR. We post updated guidance on our informational web pages at [BBBprograms.org/programs/bbb-privacy-shield/GDPR-resources](https://www.bbbprograms.org/programs/bbb-privacy-shield/GDPR-resources) along with links to outside resources, and we continue to discuss GDPR and other privacy topics in ongoing blog posts and in our periodical newsletter for participants.

## *Second Annual Review and Changes in Self-Certification Process*

In addition to informing participating businesses about GDPR developments, BBB EUPS continues to educate participants on the administrative compliance changes prompted by the Annual Review process.

BBB EUPS continues to work closely with new program applicants to help them comply with all current requirements of the Privacy Shield self-certification process. Through our routine review process, we alert our participating businesses about upcoming deadlines for re-certification, request clarification when inconsistencies are found, and follow-up through all available means of communication when lapses occur. We routinely provide updated guidance about changes to the certification process to the business community on our program website and to our participants and applicants in newsletters, service messages, and one-on-one consultations.

## *The United Kingdom*

The projected departure of the United Kingdom from the European Union has created some uncertainty among program applicants and participating businesses about how to address Privacy Shield transfers from the U.K. The Department of Commerce's December 2018 guidance on required updates to privacy policy language in the event that the U.K. exits the EU helped address those concerns. BBB EUPS continues to educate program participants about the Department of Commerce's guidance as events unfold, and we will keep businesses informed regarding the use of Privacy Shield for U.K. data transfers.

# DISPUTE RESOLUTION AND ENFORCEMENT

BBB EU Privacy Shield's dispute resolution procedures are designed with two primary goals in mind. First, to ensure that the privacy concerns of individual complainants concerning data collected in the EU or Switzerland are addressed speedily and impartially. Second, to promote privacy accountability among U.S. companies participating in the program.

BBB EU Privacy Shield provides a secure, accessible online mechanism for handling privacy complaints under the Privacy Shield Principles by individuals against participating U.S. businesses.

The service is provided free of charge to individuals, who can readily access the BBB EUPS online complaint form through a live hyperlink each participating company must include in the privacy policy posted on its public website.

The dedicated link first takes the site visitor to BBB EU Privacy Shield's consumer-facing web page entitled "For EU and Swiss Consumers" which describes the program's role as an IRM and our complaint process.<sup>2</sup> From this page, the site visitor clicks a prominent "File a Complaint" button to gain direct access to the BBB EUPS complaint form. On a second page linked from the main consumer-facing page, entitled "How to File a Complaint with BBB EU Privacy Shield," visitors can find a mailing address to communicate with the program by postal mail.

The BBB EUPS complaint form can also be accessed through the BBB Online Complaint System. The main "File a Complaint" link found on the homepage of the **BBB.org** website, as well as on pages throughout the site, enables privacy complainants to navigate through a series of guided questions to the BBB EUPS complaint form.

## COMPLAINT HANDLING RULES AND PROCEDURES

As provided in the program's Procedure Rules,<sup>3</sup> BBB EUPS engages in a multi-step process through which we determine complaint eligibility and then resolve complaints against participating businesses through our dispute resolution procedures. Language translation services are available as needed to facilitate any or all stages of the complaint review and dispute resolution process.

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<sup>2</sup> See **BBB.org/EU-privacy-shield/for-eu-consumers**. While the program welcomes complaints from individuals in the U.S. or in other countries who claim that their data was collected in the EU or Switzerland and transferred to the United States pursuant to Privacy Shield, we pay particular attention to ensuring access by EU and Swiss data subjects.

<sup>3</sup> Available at: **BBB.org/EU-privacy-shield/rules-and-policies/**.

### ***Initial Eligibility Review***

BBB EUPS staff reviews each incoming complaint to determine whether, on its face, the complaint is eligible for resolution under the program. During this step of the process, complaints are closed if they (A) do not identify a BBB EUPS participating business or (B) do not originate from an individual in the EU or Switzerland and do not otherwise allege data collection in the EU or Switzerland. When a complaint is closed for one of these reasons, the complainant is provided with instructions to pursue relevant alternative courses of resolution. If the complaint concerns an organization self-certified under Privacy Shield, we provide a link to the organization's public certification page. If the complaint concerns a U.S. business, we direct the complainant to the appropriate local BBB. If the complaint concerns a company in the EU, we provide the complainant with information on contacting the EU Data Protection Authorities.

In addition, complaints are closed at this stage if they (C) do not state a complaint of any kind (e.g., unintelligible submissions) or (D) are entirely unrelated to data protection concerns (e.g., product or service complaints). When a complaint is closed for one of these reasons, the complainant is encouraged to contact BBB EUPS with additional information if they believe their complaint is in fact eligible for resolution.

### ***Verifying Eligibility***

When a complaint appears to be potentially eligible for the program, but lacks important information, BBB EUPS contacts the complainant before opening a case to confirm that the complaint meets Privacy Shield eligibility criteria. This process may entail requesting information from the complainant such as the location of the data collection, the complainant's identity, the nature of the personal data at issue, or the nature of the complaint itself. It also may be necessary to confirm that the complainant has made a good faith effort to contact the relevant participating business about his or her complaint.

### ***Conciliation***

When a complaint is found eligible, BBB EUPS opens a formal case and works with the complainant and the participating business to develop the facts and to facilitate a mutually agreeable resolution to the complaint in a process known as conciliation. BBB EUPS and its predecessor privacy programs have resolved a majority of privacy complaints through conciliation and a settlement by the parties.

### ***Data Privacy Review***

If conciliation efforts are unsuccessful, either the complainant or the participating company may request a Data Privacy Review, which takes the form of a hearing and decision based on a review of the Case Record, including the positions of each of the parties regarding the complaint, submitted by BBB EUPS staff to an independent panelist on the program's Data Privacy Board. The panelist has discretion to seek additional written information from the parties and to convene a telephone hearing, if necessary, before issuing a final decision.<sup>4</sup>

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<sup>4</sup> See Part 4 of the Procedure Rules: [BBB.org/EU-privacy-shield/rules-and-policies/](https://www.bbb.org/EU-privacy-shield/rules-and-policies/).

Participating companies that fail to comply with BBB EUPS Data Privacy Review procedures, including failing to take agreed upon action following a conciliated settlement, or failing to implement mandated corrective action following the final decision of the independent Data Privacy Board panelist, may be referred to the appropriate federal government agency—generally the Federal Trade Commission—and the referral will be reported to the Department of Commerce. In such a case, the program is required to publish in the Annual Procedure Report the name of the participating company and the fact of the referral, along with a summary report of the facts of the case and the Procedure’s action in the matter.<sup>5</sup>

#### ***Compliance Verification and Additional Redress Options***

BBB EU Privacy Shield verifies the company’s compliance with both conciliated settlements and mandated corrective action. This includes seeking confirmation from the complainant that the matter has been resolved to his or her satisfaction. The case is then closed. However, the complainant is advised that complainants are not bound by the outcome of the BBB EUPS dispute resolution procedure, and may pursue all additional redress options available under Privacy Shield, up to and including the binding arbitration procedures provided for in Annex 1.

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<sup>5</sup> See Section 8.8 of the Procedure Rules: [BBB.org/EU-privacy-shield/rules-and-policies/](https://www.bbb.org/EU-privacy-shield/rules-and-policies/).

# 2018-19 BBB EU PRIVACY SHIELD CASEWORK

During the period of review, the BBB Online Complaints System handled more than a million general consumer complaints against U.S. and Canadian businesses from consumers in North America and worldwide. These included product and service complaints, as well as some privacy-related matters. The overwhelming majority of BBB complaints are submitted by North American consumers. About 1,800 general consumer complaints handled by the BBB system during the period of review for this report originated in the EU or Switzerland. BBB EU Privacy Shield complaint data provided in this report does not include these general consumer complaints, which are handled by other BBB organizations and programs. The report addresses only complaints submitted directly to the program by postal mail or through the dedicated Privacy Shield online complaint form located at [auto.BBB.org/eu-privacy-shield-complaint-form/](https://auto.BBB.org/eu-privacy-shield-complaint-form/).

During the period of review, BBB EUPS received **200 complaints** from individuals in the European Union and Switzerland.

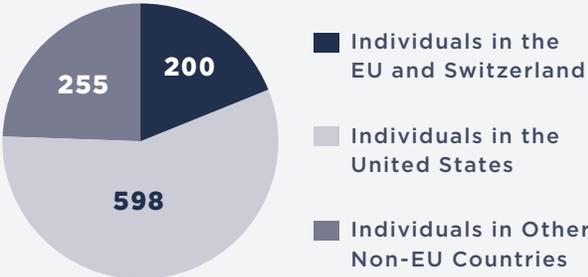
During the review period, BBB EU Privacy Shield received a total of 1,053 complaints, more than twice as many as the prior year.

### ORIGIN OF ALL COMPLAINTS RECEIVED 2018-2019

The BBB EUPS dispute resolution service was accessed during the review period by complainants from a diverse group of countries, including the EU and Switzerland. Of 1,053 complaint submissions reviewed, 200 were submitted by individuals claiming to be located in 25 EU countries plus Switzerland; 598 were submitted by individuals who provided a U.S. address; and 255 were received from individuals who appeared to be located in other countries outside the EU.

The figure below shows the geographic distribution of complaints received:

#### Complaints Received by Geographic Region



#### Breakdown of EU and Swiss Complaints Received by Country

Austria	1	Latvia	1
Belgium	2	Malta	1
Bulgaria	4	Netherlands	5
Croatia	3	Norway	4
Cyprus	1	Poland	5
Czech Republic	4	Portugal	7
France	13	Romania	9
Germany	11	Slovakia	1
Greece	2	Slovenia	1
Hungary	1	Spain	15
Iceland	1	Sweden	4
Ireland	10	Switzerland	6
Italy	6	United Kingdom	82

## STATISTICS AND ANALYSIS OF COMPLAINTS RECEIVED 2018-19

BBB EUPS received a total of 1,053 complaint submissions during the 2018-2019 reporting period.

A total of 200 complaints reviewed during this period originated in the EU and Switzerland. 189 of these complaints concerned companies not currently participating in the BBB EUPS program. 102 of these 189 out-of-scope complaints did, however, express concerns related to data privacy.

Following an eligibility review of each complaint, which included requesting additional information from the complainant wherever appropriate, the total complaints received ultimately resulted in three cases that BBB EUPS processed during the review period.

### Ineligible Complaints

Although most complaints received were found ineligible for resolution, BBB EUPS reviewed each complaint carefully, as described in the section titled “Initial Eligibility Review” on page 9 of this report. For complaints closed as ineligible, BBB EUPS sought to direct complainants to an alternative dispute resolution mechanism, where appropriate.

The table below represents the 1,045 complaints received during the reporting period that were closed after the initial eligibility review. 1,002 of these were found ineligible because they did not identify a business participating in the BBB EUPS program. BBB EUPS completed the initial eligibility review and responded to these complaints within an average of two days.

### Breakdown of Ineligible Complaints, 2018-19

Reason for Ineligibility	Region/Country of Origin <sup>6</sup>				TOTAL
	EU	Switzerland	U.S.	Other	
Not a Participating Business	183	6	583	230	1,002
Participating Business but non-complaint (e.g., comment, empty, spam)	2	0	4	20	26
Complaint, but not a privacy complaint (e.g., product or service issue)	1	0	2	0	3
Privacy complaint, but not subject to Privacy Shield			9	5	14

<sup>6</sup> For purposes of this table, the region or country of origin of the complaint is based on the contact information provided by the complainant

51 total complaint submissions identified a participating business. 11 of these originated in the EU or Switzerland. Of these complaints, 43 were closed for the following reasons:

- 26 submissions were closed as invalid because their content did not state a complaint (e.g., unintelligible comments, empty submissions, spam);
- 3 submissions stated complaints that were unrelated to privacy (e.g., product or service complaints); and
- 14 submissions were privacy complaints that were not subject to Privacy Shield (i.e. did not originate from an individual in the EU or Switzerland and did not otherwise allege receipt of the individual's data in the U.S. by the participating business).

On average, BBB EUPS closed each ineligible complaint that identified a participating business within three days. The remaining eight complaints were considered facially eligible for review through the BBB EUPS procedure.

### ***Eligible Complaints***

Complaints that appeared on their face to be eligible for resolution by BBB EUPS remained open after the initial eligibility review. At this stage, BBB EUPS reached out to each complainant for additional information needed to open a case, as described in the "Verifying Eligibility" section on page 9 of this report. Of the eight complaints potentially eligible for resolution by BBB EUPS, five were closed after 45 days when the complainants did not respond to staff requests for additional information required to proceed with each case. The remaining three eligible complaints were opened as cases in the BBB EUPS dispute resolution process.

## **RESOLVED AND ONGOING CASES 2018-19**

During the review period, BBB EUPS opened a total of three cases in the BBB EUPS dispute resolution process. Two of the cases were resolved through conciliation. As of July 31, 2019, the third case remains open pending completion of a Data Privacy Review.

### ***Cases Resolved through Conciliation***

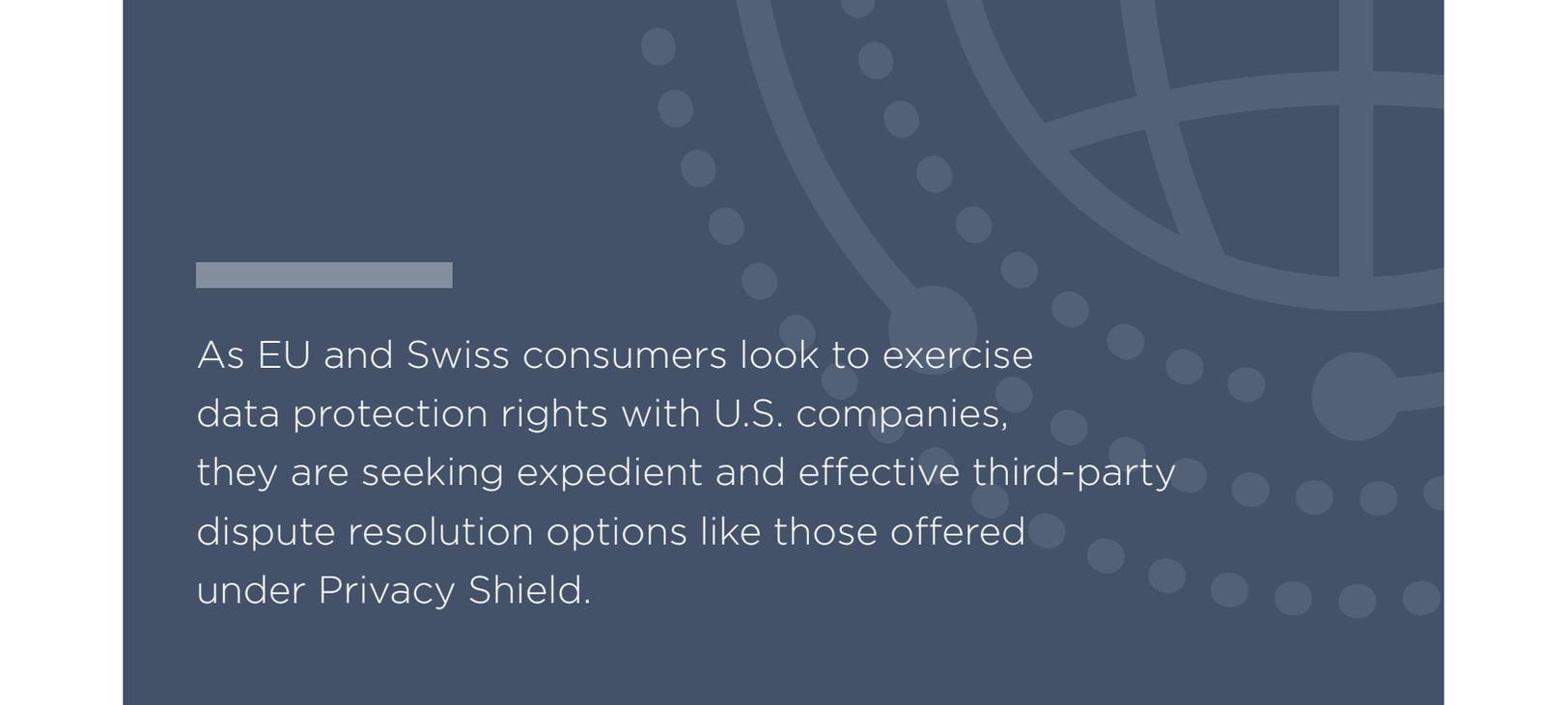
The following cases were resolved by settlement following conciliation by BBB EUPS staff, and satisfactory performance of the settlement was verified with the business and the individual.

**Case 1:** An individual requested that a participating business confirm its processing of the individual's personal information, and subsequently requested the deletion of the personal information. The case was resolved following the business's certification that the personal data had been deleted. ***Time to resolution: Settlement was certified 42 days after the complaint was initiated with BBB EUPS.***

**Case 2:** An individual alleged that personal information had been improperly handled by a participating business. The case was resolved following the business's certification of changes to internal business practices. ***Time to resolution: Settlement was certified 43 days after the complaint was initiated with BBB EUPS.***

### ***Case Pending Resolution***

As of July 31, 2019, one case is pending resolution under the Data Privacy Review process after conciliation failed to reach a settlement.



As EU and Swiss consumers look to exercise data protection rights with U.S. companies, they are seeking expedient and effective third-party dispute resolution options like those offered under Privacy Shield.

#### **OBSERVATIONS**

BBB EUPS received a substantial increase in complaint submissions during the 2018-19 reporting period. The 1,053 complaints received represent a 100% increase over the previous year. A total of 200 of those complaints originated in the EU and Switzerland, which also represents a twofold increase over the previous period. More than half of the complaints lodged with BBB EUPS by EU and Swiss individuals were related to data privacy issues involving US companies, although most of those companies were not self-certified under Privacy Shield.

We infer that the implementation of GDPR in 2018 has increased public awareness of data protection rights in the EU and Switzerland. As EU and Swiss consumers look to exercise those rights with U.S. companies, they are seeking expedient and effective third-party dispute resolution options like those offered under Privacy Shield.

## **ABOUT BBB EU PRIVACY SHIELD**

BBB EU Privacy Shield was established in 2016 as a successor program to BBB EU Safe Harbor, building on its success since 2000 as a recognized Independent Recourse Mechanism. The program provides compliance assistance and up-to-date guidance for U.S. businesses preparing for self-certification under the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks. The program also performs ongoing reviews of the Privacy Shield statements and certifications of its participating businesses. At its core, BBB EUPS operates an independent third-party dispute resolution mechanism enabling European Union and Swiss individuals to resolve Privacy Shield complaints against participating businesses. The objectives of this co-regulatory program are to ensure that privacy concerns of individual complainants are addressed expeditiously and fairly and to promote privacy accountability among participating businesses. The program provides services to more than a thousand businesses of all sizes and types. Businesses seeking information about BBB EU Privacy Shield services—and individuals with questions about privacy dispute resolution—should visit [BBB.org/EU-privacy-shield](https://www.bbb.org/eu-privacy-shield).

## **ABOUT BBB NATIONAL PROGRAMS, INC.**

For over a century, the BBB has fostered trust in the marketplace by working with businesses that commit to put customers first and to be held accountable to high standards of business ethics. Vital to this effort has been BBB's leadership in operating national and international programs across a range of industries that deliver accessible independent dispute resolution and effective third-party self-regulation. These programs have focused on such issues as online privacy, consumer dispute resolution, the protection of children, and advertising truth and accuracy.

Following the BBB's organizational restructure in 2019, BBB National Programs, Inc. (BBB NP) continues this tradition, operating programs formerly administered by the Council of Better Business Bureaus, including BBB AUTO LINE, BBB EU Privacy Shield, the Children's Advertising Review Unit (CARU), the Children's Food and Beverage Advertising Initiative, the National Advertising Division, and the Online Interest-Based Advertising Accountability Program (now called the Digital Advertising Accountability Program). More information about these programs is available at [BBBNP.org](https://www.bbbnp.org).

As a mission-driven non-profit, BBB NP fosters trust, innovation, and competition in the marketplace through the delivery of its existing cost-effective third-party self-regulation and dispute resolution programs. We work together with businesses, governments, and consumers in the development of new mechanisms to advance these goals in the evolving marketplace.

BBB NP's sister organizations, the International Association of Better Business Bureaus (representing the network of local BBBs) and the BBB Wise Giving Alliance, publish Business Profiles and Charity Reports on thousands of organizations across North America. In 2018, consumers filed more than 1 million complaints through the BBB system. You can learn more about the BBB organization at [BBB.org](https://www.bbb.org) and BBB Wise Giving Alliance at [Give.org](https://www.give.org).



[BBB.org/EU-Privacy-Shield](https://www.bbb.org/eu-privacy-shield)



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