

February 7, 2024

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International Trade Administration
U.S. Department of Commerce
1401 Constitution Ave. NW
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Washington, DC 20230

By Email

Re: Submission of APEC Accountability Agent - CBPR PRP Renewal Application

TrustArc Inc ("TrustArc") appreciates the opportunity to update its submission to renew its application to be an APEC-recognized Accountability Agent under the APEC Cross Border Privacy Rules (CBPR) and Privacy Recognition for Processors (PRP) Systems, which was submitted on November 1, 2021.

As a US-based for-profit entity, TrustArc is subject to the regulatory oversight and enforcement authority of the United States Federal Trade Commission (FTC), which is recognized as the APEC regulatory enforcement authority in the United States.

In order to continue its recognition as an APEC CBPR and PRP Accountability Agent, TrustArc has outlined how it continues to meet the Accountability Agent Recognition Criteria as outlined in Annex A of the APEC Accountability Agent Application for Recognition utilizing the Accountability Agent Recognition Criteria Checklist provided in Annex B as found in both the CBPR and PRP Accountability Agent Application documents.

Responses to the questions in the Accountability Agent Recognition Criteria Checklist are provided below in the following sections:

- Conflicts of Interest
- Program Requirements
- Certification Process
- On-going Monitoring and Compliance Review Process
- Re-Certification and Annual Attestation
- Dispute Resolution Process
- Mechanism for Enforcing Program Requirements

Documentation to support the answers to the questions is provided as appendices that are listed at the end of this document.

Please accept this packet as TrustArc's reapplication to continue its role as a recognized accountability agent under the CBPR system. For questions regarding this renewal application, please contact [Noel Luke](#), Chief Assurance Officer, at nluke@trustarc.com and Joanne Furtsch, VP Privacy Knowledge, at jfurtsch@trustarc.com.

Sincerely,

Val Ilchenko

Val Ilchenko

General Counsel and Chief Privacy Officer

Accountability Agent Recognition Criteria Checklist

Conflicts of Interest

1. *Applicant Accountability Agent should describe how requirements 1(a) and (b) in Annex A have been met and submit all applicable written policies and documentation.*

Conflict of Interest Policy

TrustArc Inc provides privacy solutions, including technology solutions and technical and consulting services to clients. Certification services are provided by TrustArc under its TRUSTe brand. We know that the integrity and objectivity of the certification process and TRUSTe seal is critical to maintaining the value of the TRUSTe brand - and its good standing with consumers, regulators and other stakeholders. This is why TrustArc has documented internal policies to avoid potential conflicts of interest and impartiality risk, including among its consulting, technical service, and certification activities.

Copies of the current version of the Corporate Conflict of Interest Policy, including specific requirements related to managing conflicts of interest in connection with TrustArc Consulting and Technical Services are attached as Appendix A to this application. As per these policies, all determinations that the relevant CBPR and/or PRP Program Requirements have been met and for making all subsequent awards of APEC certification must be performed by TrustArc's Assurance Team lead by TrustArc's Chief Assurance Officer. Consulting Services and Technical Services are provided by TrustArc's customer success teams lead by TrustArc's Chief Customer Officer. CBPR/PRP certified clients or CBPR/PRP applicants that use any of TrustArc's technical services independent of the CBPR/PRP certification process will work with a member of the TrustArc workforce outside of the Assurance Team for any matters related to those services. Our Conflict-of-Interest Policy specifically carves out a separate Assurance Team responsible for APEC Certifications and provides a sample conflict of interest disclosure form. It also preserves the independence and separation of duties of teams involved in certification while allowing for flexibility for organizational structure changes within TrustArc.

TrustArc will notify the Joint Oversight Panel in the event that a CBPR or PRP-certified company makes use of (1) any consulting services or (2) technical services not related to their CBPR or PRP certification. TrustArc will also notify the Joint Oversight Panel when a client that had previously made use of (1) any consulting services or (2) technical services not related to their CBPR or PRP certification becomes CBPR or PRP certified. In each instance, TrustArc will provide the Joint Oversight Panel with a copy of the relevant conflict of interest policy in demonstration of compliance with Accountability Agent Recognition criterion 2(d)(ii).

Finally, under US trademark law, TrustArc is required to apply the TRUSTe certification standards in an impartial manner. Any application of the certification process that is not impartial places the credibility of the certification business at risk. It may also lay the grounds

for a Section 5 claim by the FTC, TrustArc's privacy enforcement authority under the APEC CBPR and PRP Systems.

For each of these reasons, and as documented in the attachments referenced above, TrustArc believes that it continues to meet the requirements outlined in sections 1(a) and (b) of Annex A to the APEC Accountability Agent Recognition Criteria.

2. Applicant Accountability Agent should submit an overview of the internal structural and procedural safeguards to address any of the potential or actual conflicts of interest identified in 2(b) of Annex A

Please reference Appendix A to this application for copies of the TrustArc Director Conflict of Interest policy requirements, as well as our response to question 1, above. In addition, TrustArc will promptly disclose the existence of any types of affiliations as identified in 2(b) of Annex A to the Joint Oversight Panel, together with an explanation of the safeguards in place to ensure that such affiliations do not compromise TrustArc's ability to render a fair decision with respect to an Applicant organization or Participant organization.

Article IX of the Amended and Restated TrustArc Certification of Incorporation imposes penalties on any Director that violates his/her duty of loyalty to the corporation. Based on this fundamental fiduciary duty, directors of TrustArc will recuse themselves from voting on any matter which can give rise to conflict of interest as contemplated by section 2(b) of the CBPR Accountability Agent Recognition Criteria and 2(b) of the PRP Accountability Agent Recognition Criteria. This includes a potential conflict of interest in a commercial transaction normally classified as an "insider transaction."

Finally, as an entity doing business in California, TrustArc is subject to California law, which requires that all employees owe a duty of loyalty to their employer. As a result, no employee of TrustArc, including officers, can be employed by any other entity, whether that entity is a participant in a TRUSTe Assurance Program or not.

3. Applicant Accountability Agent should describe the disclosure/withdrawal mechanisms to be used in the event of any actual conflict of interest identified.

Please reference Appendix A to this application for copies of the TrustArc internal conflict of interest policies, as well as our response to questions 1 and 2 above.

In addition, where a Director identifies a conflict of interest, that Director shall either 1) recuse themselves in the event that the conflict of interest arises from a relationship that Director has, or 2) require that the Director with the conflict of interest to recuse themselves. This is a fundamental requirement of the fiduciary duty inherent in the membership of TrustArc Board of Directors.

4. *Applicant Accountability Agent should indicate whether it intends to use the relevant template documentation developed by APEC or make use of Annex C to map its existing intake procedures program requirements.*

TrustArc makes use of the relevant template documentation developed by APEC to perform both CBPR and PRP certifications. TrustArc makes these standards available at <https://trustarc.com/consumer-info/privacy-certification-standards/>. These standards are augmented by TRUSTe's Assurance Program Governance Standards which are applicable to all TRUSTe certifications (see Appendix B and available at https://trustarc.com/pdf20/Assurance_Program_Governance.pdf).

5. *Applicant Accountability Agent should submit a description of how the requirements as identified in 5 (a) – (d) of Annex A have been met.*

TrustArc meets these requirements for both the CBPR and PRP certification programs. TrustArc has an existing, comprehensive process in place to first review and remediate an applicant organization's policies and practices and then to verify its compliance with the relevant endorsed program requirements.

Overall, TrustArc uses a combination of three different methodologies to conduct the privacy certification review: a manual evaluation of the program applicant's practices, the program applicant's own attestations provided during the interview and through responses to the APEC CBPR¹ or PRP² Intake Questionnaires and interviews, and ongoing monitoring. The extent to which we use one methodology over another is dependent on a program applicant's risk profile. We examine how the program applicant collects, uses and shares personal data; we also identify the program applicant's third party, data-sharing relationships.

To meet the requirements as identified in 5 (a)-(d) of Annex A, the TRUSTe certification process involves five steps: analyze, advise, remedy, award and monitor.

- a. *Analyze*: perform an initial assessment of compliance.³
- b. *Advise*: provide a comprehensive report to the program applicant outlining our findings regarding compliance with TRUSTe's APEC Privacy Program Requirements⁴.
- c. *Remedy*: verify that the required changes provided in the comprehensive report have been properly implemented.
- d. *Award*: determine that the relevant CBPR and/or PRP Program Requirements have been met after steps a-c have been completed. The APEC certification is awarded after a member of the Assurance Team makes the certification determination. Once

¹ APEC CBPR System Intake Questionnaire: http://apec.org/Groups/Committee-on-Trade-and-Investment/~/_media/Files/Groups/ECSG/CBPR/CBPR-Intake-Questionnaire.aspx

² APEC PRP System Intake Questionnaire: <https://cbprs.blob.core.windows.net/files/PRP%20-%20Intake%20Questionnaire.pdf>

³ Appendix C is an example of TRUSTe's APEC Privacy program applicant interview form used during the Analyze portion of the certification process.

⁴ Appendix D is an example of TRUSTe's APEC Privacy findings report used during the Advise portion of the certification process.

certified, the applicant becomes a Participant in the TRUSTe APEC Privacy Program.

e. *Monitor*: verify ongoing compliance with Program Requirements.

6. *Applicant Accountability Agent should submit a description of the written procedures to ensure the integrity of the certification process and to monitor the participant's compliance with the program requirements described in 5 (a)-(d).*

TrustArc meets this requirement for both the CBPR and PRP certification programs and has included a description of our written procedures to ensure the integrity of the certification process and to monitor the Participant's compliance with the Program Requirements as described in 5(a)-(d). Once a Participant completes the initial certification process as defined in requirements 5 (a)-(d),

TrustArc has processes in place to ensure that compliance with APEC's CBPR and PRP Privacy Program Requirements are maintained.

Within six months of the Participant's initial certification or certification renewal, TrustArc's Quality Improvement Team (QI Team) will conduct a check on the privacy notice, where there is a notice requirement. The QI Team verifies if the privacy notice reviewed against the program requirements is the one that is available on the Participant's website, and still meets the program requirements. The QI Team also verifies that the seal is implemented properly, and displayed on the privacy notice that has met the program requirements. If the Participant has failed to post the privacy notice that meets the program requirements, or unauthorized use of the TRUSTe APEC Privacy or APEC Processor Seal is found, the Participant is notified of the issues. The participant must reply to the QI Team without delay and is given up to thirty (30) days for technical implementation of required corrections. If the required corrections are not made in thirty (30) days, TrustArc will remove the TRUSTe APEC Privacy or APEC Processor Seal from the Participant's website by switching them to the "Privacy Feedback Button."⁵

TrustArc's Compliance Team monitors both privacy-related disputes received through TRUSTe's Dispute Resolution Mechanism and developments in the press to proactively identify potential issues pertaining to existing TRUSTe Participants. Examples might include press coverage of a data security breach, or a news article regarding the data use or sharing practices. The response is issue specific. For instance, in the case of a security breach, TrustArc may reach out to the Participant. In the case of a data use or sharing issue, TrustArc may research the issue first before determining if direct contact with the Participant is necessary.

⁵ TrustArc has a policy of switching participating companies' certification seal status to its "Privacy Feedback Button" if requirements of the applicable certification program are not currently being met by that company. The "Privacy Feedback Button" directs individuals to a TRUSTe validation and dispute resolution webpage where they can submit a privacy question or feedback regarding a company's privacy practices.

7. Applicant Accountability Agent should describe the review process to be used in the event of a suspected breach of the program requirements described in 5(a)-(d) of Annex A.

TrustArc meets this requirement for both the CBPR and PRP certification programs and has a review process in place to investigate a suspected breach of the program requirements under both systems.

The enforcement process begins with an internal compliance investigation. TrustArc may initiate this investigation based on results of our monitoring, on information contained in a consumer complaint, news or press reports, regulator inquiry, or reports from other credible sources. This process assists in the verification of compliance or non-compliance with the program requirements.

Where non-compliance with any of the program requirements is found, TrustArc will investigate the compliance issue, notify the Participant, outline the corrections necessary and provide a reasonable timeframe for the Participant to make such changes, during which time, TrustArc will work with the Participant to ensure the necessary changes are made.

Our investigations have one of three possible outcomes:

- An agreement between TrustArc and the Participant over the privacy complaint resulting in the Participant's resolution that addresses the concern or request. TrustArc provides a reasonable timeframe to complete the required changes based on the risk and level of non-compliance.
- A disagreement triggering a notice of formal enforcement, resulting in the Participant's suspension or notice of intent to terminate for cause if the matter is not cured.
- A failure to implement the required cure resulting in TrustArc terminating the Participant from the program, and in extreme cases, publication and/or referral to the appropriate authority.

However, where the Participant is found to have displayed the TRUSTe seal on an out-of-scope online property, Participant shall promptly remove the seal from that property or face automatic suspension until the seal is removed.

8. Applicant Accountability Agent should describe their re-certification and review process as identified in 8(a)-(d) of Annex A.

TrustArc meets this requirement for both the CBPR and PRP certification programs. At least annually, TrustArc investigates whether its Participants are meeting and/or exceeding APEC's CBPR and/or PRP Privacy Program Requirements through a recertification process. If the Participant notifies TrustArc of a change or TrustArc detects a change outside the 'annual' recertification cycle, the change will be verified by TrustArc immediately, regardless of whether it is time for the Participant's annual recertification or not.

Details of the recertification process and annual attestation to answer questions Annex A 8 (a)-(d) are defined below.

- a. *Analyze*: perform an assessment of compliance.
- b. *Advise*: provide a comprehensive report to the Participant outlining our findings regarding compliance with APEC's CBPR and/or PRP Privacy Program Requirements.
- c. *Remedy*: verify the required changes outlined in the comprehensive report have been properly implemented.
- d. *Notify*: notify the Participant that it is in compliance with the relevant APEC Privacy Program Requirements.

9. *Applicant Accountability Agent should describe the mechanism to receive and investigate complaints and describe the mechanism for cooperation with other APEC recognized Accountability Agents that may be used when appropriate.*

TrustArc has an existing Feedback and Dispute Resolution System⁶ that meets this requirement for both the CBPR and PRP Systems. The Feedback and Dispute Resolution System is provided under the TRUSTe brand. We manage this dispute resolution process in-house and do not contract out this service to a third party.

Our dispute resolution process is a mechanism to receive and investigate privacy-related complaints about Participants and to resolve these disputes between complainants and Participants. Consumer dispute resolution is a key component of TrustArc's privacy management solution suite and helps us monitor Participants' compliance with the relevant Privacy Program Requirements and hold Participants accountable. Processing complaint disputes also provides TrustArc with a window into the privacy issues that concern today's online consumers. This dispute resolution process is described in detail below.

10. *Applicant Accountability Agent should describe how the dispute resolution process meets the requirements identified in 10 (a) – (h) of Annex A, whether supplied directly by itself or by a third party under contract (and identify the third party supplier of such services if applicable and how it meets the conflict of interest requirements identified in sections 1-3 of Annex A) as well as its process to submit the required information in Annexes D and E.*

TrustArc has its own in-house Feedback and Resolution System that meets the requirements identified in 10(a)-(h) of Annex A as described here:

Receiving a Complaint

The TRUSTe Feedback and Resolution System's process begins with a consumer complaint filed with TrustArc against a TRUSTe program Participant. After TrustArc receives a complaint, we initiate an investigation. An investigation may also be initiated after a

⁶ TRUSTe' Feedback and Dispute Resolution System can be found at <https://feedback-form.truste.com/watchdog/request>

TrustArc review, a media report, regulator inquiry or information obtained through other credible sources. We then review the complaint to determine if the complaint is relevant and falls under the scope of the Program Requirements. This can take up to ten (10) business days.

Responding to & Investigating a Complaint

The consumer (complainant) receives our initial response within ten (10) business days, our published time frame⁷. The system notifies the complainant of the response by the Participant, if any. Complainant and the Participant may correspond directly, with TrustArc copied, such as in the event that the Participant asks the complainant for further information. Complainant and Participant are copied when TrustArc sends its determination. The nature and duration of the investigation needed can vary widely. We quickly check all issues that can be immediately verified but ultimate resolution of the complaint depends on the nature of the issue.

Resolving a Complaint

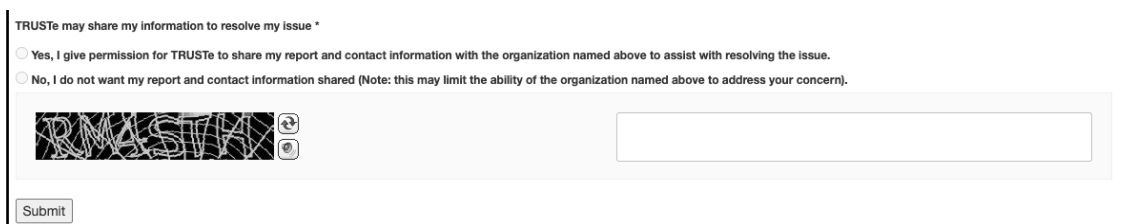
After the complaint has been investigated, the Participant ordinarily has ten (10) business days to provide a written response for the complainant. For more urgent issues, such as security vulnerabilities, we escalate to the Participant via phone as well and generally expect responses much sooner, especially if we are able to verify the problem.

Written Notice of Complaint Resolution

Once the complaint is resolved, we will send an email notice to both the complainant and, if participating, the Participant, notifying them of closure of the complaint.

Process for Obtaining Consent

Our Feedback and Resolution form asks the complainant to provide consent before sharing their personal information with the program Participant against whom the dispute is filed. All personal information collected during the request for assistance is collected in accordance with the TrustArc Privacy Notice (available at <https://www.trustarc.com/privacy-policy/>) and our internal privacy policies and standards. Below is a screenshot from TRUSTe's Feedback and Resolution Form illustrating the online consent mechanism. Note, the complainant must indicate whether they want their complaint shared prior to submitting their complaint.

The screenshot shows a web form titled "TRUSTe may share my information to resolve my issue *". It contains two radio button options: "Yes, I give permission for TRUSTe to share my report and contact information with the organization named above to assist with resolving the issue." and "No, I do not want my report and contact information shared (Note: this may limit the ability of the organization named above to address your concern).". Below the options is a large text input field with a placeholder image of a stylized "TRUSTe" logo. To the right of the text field is a smaller, empty text input field. At the bottom left of the form is a "Submit" button.

Screenshot 1 – Consent Mechanism

⁷ The published time frame can be found on TRUSTe's Feedback and Resolution Form at <https://feedback-form.truste.com/watchdog/request>

Reporting Complaint Statistics and Release of Case Notes

TrustArc previously submitted complaint statistics and case notes for the CBPR and PRP systems for the periods from March 1, 2021 - February 28, 2022⁸ and March 1, 2022 – February 28, 2023⁹. TrustArc will submit its annual complaint statistics and case notes for the CBPR and PRP systems for the reporting period from March 1, 2023 – February 29, 2024, no later than March 31, 2024.

TrustArc is also required to post compliant statistics around Data Privacy Framework participants in its role as an Independent Dispute Resolution mechanism under the Data Privacy Framework Principles. Its most recent report, August 1, 2022 - July 31, 2023 can be found on TrustArc's website at <https://trustarc.com/data-privacy-framework/> and reports for years prior to August 2022 can be found at <https://trustarc.com/privacy-shield/>.

Handling Complaints under PRP

As part of its APEC PRP certification review process, TRUSTe verifies that the APEC PRP Participant has a documented process in place for forwarding complaints to the appropriate controller where applicable to ensure the Participant manages complaints it receives as required under the PRP Program Requirements.

The process, timelines and outcomes for reviewing, investigating, and resolving a complaint received against a participant under the APEC PRP program is the same as described in this section, and Sections 7 and 9.

Additionally, under section IV of our Annual Dispute Resolution Report TrustArc describes how it meets the requirements of PRP 10(c)(i)-(iii). TRUSTe also posts information about its Dispute Resolution process on its website at <https://trustarc.com/dispute-resolution-faqs/>.

11. Applicant Accountability Agent should provide an explanation of its authority to enforce its program requirements against participants.

TrustArc has the authority to enforce its program requirements (including our Governance Standards found in Appendix B) against Participants through our Assurance Services Agreement (“ASA”), or a substantially similar services agreement, which we require all clients to execute before we begin the engagement (see Appendix F). This is reflected in TRUSTe’s ASA, section 3.1.1: “If participating in TRUSTe Assurance Services, Customer shall fully comply with the applicable Assurance Standards, including but not limited to any annual (or other) recertification requirements contained in the applicable Assurance Standards.”

⁸ TrustArc's complaint statics for March 1, 2021 - February 28, 2022 can be found under TRUSTe 2022 tab on the CBPRs.org site at <https://cbprs.org/documents/>

⁹ TrustArc's compliant statistics for March 1, 2022 - February 28, 2023 is attached as Appendix G to this application.

- 12. Applicant Accountability Agent should describe the policies and procedures for notifying a participant of non-compliance with Applicant's program requirements and provide a description of the processes in place to ensure the participant remedy the non-compliance.*

Once TrustArc identifies that a Participant is out of compliance with the relevant program requirements, either through our recertification process, ongoing monitoring, or dispute resolution process, the Participant will be contacted immediately by the designated contact individual at TrustArc. We will outline the corrections necessary to come back into compliance with our program requirements and provide a reasonable timeframe. TrustArc will continue to work with the Participant to come back into compliance.

If the Participant fails to come back into compliance with the relevant program requirements, TrustArc will take steps, as outlined below, to either temporarily remove the seal from the Participant's website or terminate the Participant's participation in the program.

- 13. Applicant Accountability Agent should describe the policies and procedures to impose any of the penalties identified in 13 (a) – (e) of Annex A.*

If the Participant does not remedy the non-compliance within a specific time period, TrustArc has a process in place to place the Participant on suspension. This is reflected in TRUSTe's Assurance Program Governance Standards (see Appendix B) - Section K, Certification Status excerpted below:

K. Certification Status

1. In the event TRUSTe determines that Participant's compliance with the Assessment Criteria of the program(s) the Participant is participating in has lapsed, TRUSTe will provide notice and, if not resolved within a reasonable timeframe as determined by TRUSTe, discontinue Participant's certification.
2. TRUSTe may reinstate the Participant's certification if the Participant demonstrates to TRUSTe, and TRUSTe has verified, that all the required changes have been completed.
3. Upon notice to the Participant, TRUSTe may discontinue immediately the Participant's certification if the Participant is found in material breach of the Assurance Program Governance Standards or Assessment Criteria of the program(s) in which the Participant is participating. Material breaches include but are not limited to:
 - a. Participant's material failure (e.g., unauthorized use of the TRUSTe seal, failure to complete Annual Review by the anniversary of the prior year certification date) to adhere to the Assessment Criteria

of the program(s) in which they are participating;

b. Participant's material failure to permit or cooperate with a TRUSTe investigation or review of Participant's policies or practices pursuant to the Assurance Program Governance policies, rules, and guidelines;

c. Participant's material failure to cooperate with TRUSTe regarding an audit, privacy-related complaint, or the compliance monitoring activities of TRUSTe; or

d. Any deceptive trade practices by the Participant.

4. If TRUSTe discovers unauthorized use of the TRUSTe seal, TRUSTe will notify the Participant and discontinue immediately the Participant's certification if the issue is not resolved.

Referral to Relevant Privacy Authority

If a client does not cure a non-compliance issue and is terminated, TrustArc evaluates factors such as whether the violation was egregious and intentional, or whether impact was de minimis. TrustArc may refer the issue to the appropriate public authority or enforcement agency.

TrustArc's referral to a privacy enforcement authority will also be contingent on whether or not the actions of the client rise to a level which would trigger jurisdiction by the privacy enforcement authority. TrustArc does not refer clients to privacy enforcement authorities where such authority would be unable to take action against the referred client.

In TrustArc Policy CP 3.2 Privacy Communications and Individual Rights Management Process, TrustArc outlines its processes for handling communications from individuals, regulators, and other external stakeholders. All communications and requests are sent to TrustArc's Office of General Counsel for review and response to the communication or request. CP3.2 is attached as Appendix H to this application.

Other penalties – including monetary penalties – as deemed appropriate by the Accountability Agent.

If a client does not cure a non-compliance issue and is terminated, TrustArc evaluates factors such as whether the violation was egregious and intentional, or whether impact was de minimis, in determining whether to publicize the non-compliance. TrustArc does not have authority by contract to impose monetary penalties. Further, no commercial entity would enter into a contract with us if we were to have a contractual authority to impose monetary penalties.

14. Applicant Accountability Agent should describe its policies and procedures for referring matters to the appropriate public authority or enforcement agency for review and possible law enforcement action. [NOTE: immediate notification of violations may be appropriate in some instances.]

TrustArc's policies and procedures for referral to the appropriate public authority or enforcement agency, including responding to requests from enforcement entities in APEC Economies, are explained above as response to item 7 - *On-going Monitoring and Compliance Review Processes*. In Section 7 we reference referral to cooperating regulatory authorities as part of one of the potential outcomes of our investigation process for non-compliance. Further under Section 13 above we outline the process for when we may refer something to a regulatory authority.

15. Applicant Accountability Agent should describe its policies and procedures to respond to requests from enforcement entities in APEC Economies where possible.

TrustArc's policies and procedures for referral to the appropriate public authority or enforcement agency, including responding to requests from enforcement entities in APEC Economies, are explained above as response to item 7 - *On-going Monitoring and Compliance Review Processes*.

Appendix

Appendix A

TrustArc Conflict of Interest Policy

- CP4: Conflicts of Interest Policy
- CP4.1: Operating Standards: Provision of Consulting Services
- CP4.2: Operating Standards: Provision of Technical Services Unrelated to APEC CBPR or PRP Certification
- CP4.3: Operating Standards: Board of Directors
- Conflict of Interest Acknowledgement and Disclosure Form

Appendix B

TrustArc Assurance Program Governance Standards

Appendix C

Client Interview Form

Appendix D

TrustArc Sample Findings Report CBPR

Appendix E

January 2024 CBPR and PRP Compliance Directories

Appendix F

TrustArc Assurance Services Addendum (ASA)

Appendix G

Annual APEC CBPR and PRP Dispute Resolution Report Reporting Period March 1, 2022, through February 28, 2023

Appendix H

TrustArc Policy CP 3.2 Privacy Communications and Individual Rights Management Process