

## **Safe Harbor Data Privacy Statement**

Compliance Technologies International, LLP (“CTI”) is committed to protecting the privacy and security of its clients, partners, and associates and therefore operates under a set of strict privacy principles.

CTI adheres to the Safe Harbor Agreement concerning the transfer of personal data from the European Economic Area (“EEA”) and/or Switzerland to the United States of America. Accordingly, CTI follows the Safe Harbor Principles published by the U.S. Department of Commerce. If there is any conflict between the policies between these EEA and Swiss Safe Harbor Privacy Guidelines (these “Privacy Guidelines”) and the principles published by the U.S. Department of Commerce, the latter principles shall govern.

### **1. Notice**

This policy applies to all personal data CTI handles, including on-line, off-line, and manually processed data received from the EEA and/or Switzerland not otherwise covered by an alternative mechanism. Personal data is defined as any information or set of information that identifies or can be used to identify an individual. Personal data does not include information that is encoded or anonymized, or publicly available information that has not been combined with non-public personal information.

CTI uses personal data to perform its obligations pursuant to a client agreement. CTI collects personal data from individuals only as permitted by the Privacy Guidelines. Consent for personal data to be collected, used, and/or disclosed in certain ways may be required in order for an individual to obtain or use CTI services. Such consent is provided through engagement letters, employment agreements, and other similar documents.

CTI does not use personal data for purposes incompatible with that purpose for which the data was originally collected or authorized by the client or an individual.

CTI reserves the right to share personal data to respond to duly-authorized information requests of governmental authorities or where otherwise required by law. In exceptionally rare circumstances where national, state, or company security is at issue, CTI reserves the right to share our database of visitors and customers with appropriate governmental authorities.

CTI understands the importance of protecting children’s privacy, especially in an online environment. CTI’s on-line sites are not intentionally designed for or directed at children under the age of 13. CTI does not collect personal data from any person we actually know is an individual under the age of 13, except as part of an engagement to provide professional services.

CTI respects the privacy of visitors to its websites. CTI collects information that can identify users, such as name, address, telephone number, e-mail address and other similar information (“Information”) when it is voluntarily submitted to CTI. CTI will use this Information to respond to requests made of CTI and from time to time, CTI may refer to this Information to better understand the requester’s needs and how CTI can improve its websites, products and services. CTI may also use this Information to contact the person and/or provide general information as well as information about our products and services.

## **2. Choice and Access**

CTI provides services for its EEA and/or Swiss clients. Individual account holders, customers and/or vendors of our client are encouraged to contact the EEA and /or Swiss client first as it relates to third party disclosure of their data.

If personal data is submitted to CTI by way of our client, under most circumstances the individual has the right to reasonable access to that data to correct any inaccuracies. The individual can also make a request to update or remove data by contacting CTI if their efforts with our client were not successful. CTI will make all reasonable and practical efforts to comply with this request if it is consistent with applicable law and professional standards.

CTI will offer individuals the opportunity to choose (opt out) whether their personal data is (1) to be disclosed to a third party, or (2) to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual.

CTI will allow an individual access to their personal data and allow the individual to correct, amend or delete inaccurate data, except where the burden or expense of providing access would be disproportionate to the risks to the privacy of the individual in question or the rights of persons other than the individual would be violated.

CTI will give individuals the opportunity to affirmatively or explicitly (opt out) consent to the disclosure of the data for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual.

## **3. Onward Transfer (Transfers to Third Parties)**

Prior to disclosing personal data to a third party, CTI shall notify our EEA and/or Swiss client of such disclosure and allow the client the choice (opt out) of such disclosure. CTI shall ensure any third party to whom personal data may be disclosed subscribes to the Principles or is subject to law providing the same level of privacy protection as is required by the Principles and agrees in writing to provide an adequate level of privacy protection.

## **4. Data Security and Integrity**

CTI has adequate security policies and procedures in place to protect personal data from unauthorized loss, misuse, alteration, or destruction. CTI only processes personal data in a way compatible and relevant for the purpose for which it was collected or authorized by our client or by the individual. Despite CTI's best efforts, however, security cannot be absolutely guaranteed against all threats. To the best of CTI's ability, access to personal data is limited to those who have a demonstrable need to know. Those individuals who have access to the data are required to maintain the confidentiality of such data. CTI also makes reasonable efforts to retain personal data only as is necessary to comply with a Client's request or until the Client or the individual asks the data be deleted. CTI cannot guarantee the security of data transmitted via the Internet.

## **5. Enforcement**

CTI uses a self-assessment approach to assure compliance with this privacy policy and has put in place mechanisms to verify our ongoing adherence to these principles. We encourage individuals covered by this policy to raise any concerns using the contact data provided and we will do our best to resolve them.

If a complaint or dispute cannot be resolved through our internal process, we agree to dispute resolutions using American Arbitration Association as a third-party resolution provider. Costs associated with the dispute resolution will be shared equally by both parties.

## **6. Amendments**

These Privacy Guidelines may be amended from time to time consistent with the requirements of the Safe Harbor. We will post any revised policy on this website.

## **7. Information Subject to Other Policies**

We are committed to following the Privacy Guidelines for all personal data within the scope of the Safe Harbor. However, certain information is subject to policies of CTI differing in some respects from the general policies set forth in this privacy policy.

## **8. Contact Information**

Questions, comments, or complaints regarding these Privacy Guidelines or data collection and processing practices can be mailed or emailed to:

Compliance Technologies International, LLP  
Attn: Chief Operating Officer  
200 Brickstone Square, Box 23  
Andover, MA 01810-1426  
Email: [mdarcy@cticompliance.com](mailto:mdarcy@cticompliance.com)

For more information about the Safe Harbor Principles, please visit the U.S. Department of Commerce's Website at <http://export.gov/safeharbor/>