

## **SAFE HARBOR COMPLIANCE STATEMENT**

### **Human Synergistics, Inc. Effective as of January 18, 2012**

Human Synergistics, Inc. (“The Company”) has developed and provided high-quality assessments and simulations for individuals, leaders, teams, and organizations to actualize their potential since 1971. All of the survey instruments meet scientific standards for reliability and validity as defined by the American Psychological Association. The Company has always taken a number of steps to protect individuals’ privacy, including the safekeeping of individual survey responses.

The Company adheres to the U.S. – EU Safe Harbor Framework and the U.S. – Swiss Safe Harbor Framework concerning the transfer of personal data from the European Union (“EU”) and Switzerland to the United States of America. Accordingly, we follow the Safe Harbor Principles published by the U.S. Department of Commerce (“Principles”) with respect to all such data. If there is any conflict between the policies in this statement and the Principles, the Principles will govern. This statement outlines our general policy and practices for implementing the Principles, including the types of information we gather, how we use it, and the choices affected individuals have regarding our use of, and their ability to correct, that information.

This statement applies to all personal information we handle (except as noted below), including on-line, off-line, and manually processed data. For purposes of this statement, “personal information” means information that:

- is transferred from the EU or Switzerland to the United States;
- is recorded in any form;
- is about, or pertains to, a specific individual;
- can be linked to that individual;

It does not include information that pertains to a specific individual, but from which that individual could not reasonably be identified.

## **Principles Protecting Individuals' Privacy**

### *Notice and Choice*

To the extent permitted by the Safe Harbor Agreement, The Company reserves the right to process personal information in the course of providing professional services to our clients without the knowledge of individuals involved. Where we collect personal information directly from individuals in the EU and Switzerland, we inform them of the purposes for which we collect and use it.

### *Disclosures and Transfers*

The Company will not disclose an individual's personal information to third parties, except when one or more of the following conditions is true:

- We have the individual's permission to make the disclosure;
- The disclosure is required by law or professional standards;
- The disclosure is reasonably related to the sale or disposition of all or part of our business;
- The information in question is publicly available;
- The disclosure is reasonably necessary for the establishment or defense of legal claims; or
- The disclosure is to another affiliated entity or to persons or entities providing services on our or the individual's behalf (each a "transferee"), consistent with the purpose for which the information was obtained, if the transferee, with respect to the information in question:
  - is subject to law providing an adequate level of privacy protection;
  - has agreed in writing to provide an adequate level of privacy protection; or
  - subscribes to the Principles.

Permitted transfers of information, either to third parties or within our organization, include the transfer of data from one jurisdiction to another, including transfers to and from the United States of America. Because privacy laws vary from one jurisdiction to another, personal information may be transferred to a jurisdiction where the laws provide less or different protection than the jurisdiction in which the information originated.

### *Data Security*

The Company takes reasonable steps to protect your information. To prevent unauthorized access or disclosure, The Company has put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we process. However, we cannot guarantee the security of information on or transmitted via the Internet.

### *Data Integrity*

The Company processes personal information only in ways compatible with the purpose for which it was collected or subsequently authorized by the individual. To the extent necessary for such purposes, we take reasonable steps to make sure that personal information is accurate, complete, current, and otherwise reliable with regard to its intended use.

### *Access and Correction*

If an individual becomes aware that information we maintain about that individual is inaccurate, or if an individual would like to update or review his or her information, the individual may contact us using the contact information below. We will take reasonable steps to permit individuals to correct, amend, or delete information that is demonstrated to be inaccurate. The individual will need to provide sufficient identifying information, such as name, address, birth date, or other information that we may request as a security precaution. No individual will be allowed to review or modify another individual's information. In addition, we may limit or deny access to personal information where providing such access would be unreasonably burdensome or expensive in the circumstances, or as otherwise permitted by the Safe Harbor Agreement. In some circumstances, we may charge a reasonable fee, where warranted, for access to personal information.

### *Enforcement and Dispute Resolution*

The Company utilizes the self-assessment approach to assure its compliance with our privacy statement. We periodically verify that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented, and in conformity with the Principles. We encourage interested persons to raise any concerns with us using the contact information below. We will investigate and attempt to resolve complaints and disputes regarding use and disclosure of personal information in accordance with the principles contained in this policy.

With respect to any complaints relating to this policy that cannot be resolved through our internal processes, we have agreed to participate in the Council of Better Business Bureau's (CBBB) Safe Harbor Privacy Dispute Resolution Procedure. In the event that we or such authorities determine that we did not comply with this policy, we will take appropriate steps to address any adverse effects and to promote future compliance. Any person who we determine is in violation of our privacy policies will be subject to disciplinary process.

## **Privacy Statement Changes**

This privacy statement may be changed from time to time, consistent with the requirements of the Safe Harbor program. We will post any revised policy on this Web site, or a similar Web site that replaces this Web site.

## **Information Subject to Other Policies**

We are committed to following the Principles for all personal information within the scope of the Safe Harbor Agreement.

Information relating to present or former personnel of our organization is subject to our policies concerning personnel data privacy, which are available to present personnel and former personnel of The Company upon request.

Information obtained from or relating to clients or former clients is further subject to the terms of any privacy notice to the client, any engagement letter or letters with the client, and applicable laws.

## **How to Contact Us**

If you have any questions regarding this policy, please contact:

Privacy Contact: Deborah DeFranco  
Human Synergistics, Inc.  
21 South Evergreen Ave.  
Suite 100  
Arlington Heights, IL 60005  
Phone: 847-590-0995  
Fax: 847-590-0997  
Email: [Debby@hscar.com](mailto:Debby@hscar.com)

If you do not receive acknowledgement of your complaint or your complaint is not satisfactorily addressed by Human Synergistics, please visit the BBB EU Safe Harbor web site at <http://www.bbb.org/us/safe-harbor-complaints> for more information and to file a complaint.