

Department:	Information Systems	
Policy No.	DP-1.0	
Policy Name:	Data Privacy	
Revision:	Version Number: 1.0	Date: 02/01/2013
Effective Date:	February 1, 2013	
Executive Committee Approval:		Date: 01/09/2014

I. Definitions

US-EU Safe Harbor Agreement: A structured approach by which US companies certify that data protection controls are in place to ensure the privacy of, and unauthorized access to personal data involved in trans-Atlantic transactions.

Personal Information: Information that (1) is transferred from the EU to the United States; (2) is recorded in any form; (3) is about, or pertains to a specific individual; and (4) can be linked to that individual.

Sensitive Personal Information: Information that reveals race, ethnic origin, sexual orientation, political opinions, religious or philosophical beliefs, trade union membership or that concerns an individual's health.

Principles: Issued by the Department of Commerce to diminish data privacy uncertainty and provide a more predictable framework for data transfers.

II. Purpose of Policy

Alphanumeric Systems, Inc. (ASI) is committed to conducting business in compliance with all applicable laws, regulations and internal policies. ASI has instituted this policy to ensure that controls are designed and implemented to comply with the [U.S.-EU Safe Harbor Framework](#), including the Safe Harbor Privacy Principles. We have registered with the U.S. Department of Commerce self-certifying our compliance with the U.S.-EU Safe Harbor Framework to further provide assurance that we protect personal data.

III. Scope of Policy

This policy ensures that ASI's internal privacy and security controls ensure the privacy of all personal information being transferred from the European Union to the United States. Accordingly, we follow the Safe Harbor Privacy Principles published by the U.S.



Department of Commerce (the “Principles”) with respect to all such data. If there is any conflict between the policies in this privacy policy and the Principles, the Principles shall govern.

IV. Policy

This privacy policy outlines ASI’s general policy and practices for implementing the principles, including the types of information ASI gathers, how ASI uses it and the notice and choice affected individuals have regarding ASI’s use of and their ability to correct that information. The following are the details of the coverage of ASI’s privacy program.

1. Any information ASI obtains is used only for specified and lawful purposes only in the performance of the services for which ASI has been engaged.
2. ASI asks only for information that is reasonably adequate, relevant, and not excessive to allow ASI to perform the services for which ASI has been engaged.
3. ASI maintains information accurately and where necessary takes steps to maintain and/or ensure its accuracy.
4. ASI processes information in accordance with individual rights (which are detailed below) and by the explicit permissions given to ASI to use individual data on their behalf.
5. ASI keeps data in secure, audited and ASI controlled systems pursuant to SOC 2 compliant policies.
6. All data is housed at ASI’s secure US facilities.

To ensure the privacy of personal information, ASI has implemented measures to address the following seven principles:

1. NOTICE

ASI shall inform an individual of the purpose for which it collects and uses personal information and the types of non-agent third parties to which the ASI discloses or may disclose that Information. ASI shall provide the individual with the choice and means for limiting the use and disclosure of their personal information. Notice will be provided in clear and conspicuous language when individuals are first asked to provide personal information to the ASI, or as soon as practicable thereafter, and in any event before ASI uses or discloses the information for a purpose other than for which it was originally collected.

2. CHOICE

ASI will offer individuals the opportunity to choose (opt out) whether their personal information 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. For sensitive personal information, ASI will give individuals the opportunity to affirmatively or explicitly (opt out) consent to the disclosure of the information for a purpose other than the purpose for which it was originally collected

or subsequently authorized by the individual. ASI shall treat sensitive personal information received from an individual the same as the individual would treat and identify it as sensitive personal information.

3. ONWARD TRANSFER (Transfer to Third Parties)

ASI does not disclose any personal information to any third party except as required in the performance of the services for which we have been engaged. The transfer of information for reporting purposes are limited to individuals and/or their agents.

4. DATA SECURITY

ASI shall take reasonable steps to protect information from loss, misuse and unauthorized access, disclosure, alteration and destruction. ASI has put in place appropriate physical, electronic and managerial procedures to safeguard and secure information from loss, misuse, unauthorized access or disclosure, alteration or destruction. ASI cannot guarantee the security of information on or transmitted via the internet.

5. DATA INTEGRITY

Company shall only process Personal Information in a way that is compatible with and relevant for the purpose for which it was collected or authorized by the individual. To the extent necessary for those purposes, Company shall take reasonable steps to ensure that Personal Information is accurate, complete, current and reliable for its intended use.

6. ACCESS

ASI allows individuals to access their personal information and allows individuals to correct, amend or delete inaccurate information, except where the burden or expense of providing access would be disproportionate to the risks to the privacy of the individual in the case in question or where the rights of persons other than the individual would be violated.

7. ENFORCEMENT

ASI uses a self-assessment approach to assure compliance with this privacy policy and periodically verifies that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented and accessible and in conformity with the principles. We encourage individuals to raise any concerns using the contact information provided and we will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of personal information in accordance with the principles.

If a complaint or dispute cannot be resolved through our internal process, we agree to participate in the dispute resolution procedures of the panel established by the EU data protection authorities (DPAs) to resolve disputes pursuant to the Safe Harbor Privacy Principles. The panel may be contacted at ec-dppanel-secr@ec.europa.eu and



the EU DPAs may be contacted directly via the information provided at http://ec.europa.eu/justice/data-protection/bodies/authorities/eu/index_en.htm.

V. Contact Information

Questions, comments or complaints regarding ASI’s Safe Harbor Data Privacy Policy or data collection and processing practices can be mailed or emailed to:

Alphanumeric Systems, Inc.
Attn: Human Resources
3801 Wake Forest Road
Raleigh, North Carolina 27609
baldrige@alphanumeric.com

VI. Document Change History

Version No.	Date of Change	Revised By	Description of Change
1.0	01/28/13	Don Jones	Initial Draft
1.0	02/08/14	Don Jones	Reviewed with no changes