

EU – US Privacy Shield COMPLIANCE STATEMENT

Human Synergistics, Inc.
Last modified July 29, 2016

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.

Human Synergistics, Inc. complies with the EU – US Privacy Shield Framework , as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries. Human Synergistics, Inc. has certified that it adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability. If there is any conflict between the policies in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>.

Human Synergistics, Inc. complies with the US-Swiss Safe Harbor Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from Switzerland. Human Synergistics, Inc. has certified that it adheres to the Safe Harbor Privacy Principles of Notice, Choice, Onward Transfer, Security, Data Integrity, Access, and Enforcement. If there is any conflict between the policies in this privacy policy and the Safe Harbor Privacy Principles, the Safe Harbor Privacy Principles shall govern. To learn more about the US-Swiss Safe Harbor and to view our certification page, please visit <http://www.export.gov/safeharbor/>.

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:

- o is transferred from the EU or Switzerland to the United States;
- o is recorded in any form;
- o is about, or pertains to, a specific individual;
- o 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.

Human Synergetics, Inc. is subject to the investigatory and enforcement powers of the FTC.

At Human Synergetics, Inc. survey and diagnostic inventory sites, a client provides information about themselves, another person they know well, or their group or organization. They may also provide background information, including demographics or information about their position in their organization. They will not be asked to provide information related to ordering additional products, expressing opinions or feedback on products, subscribing to other HSI services, or participating in online forums (except those, if any, directly relevant to the survey or exercise that they are currently completing).

The types of personally identifiable information that may be collected at this site include: name, organization, e-mail address, and demographic and positional information pertinent to the use of this survey and directly related HSI products and services.

We also may collect certain non-personally identifiable information when they visit our Web pages, such as the type of browser and/or operating system they are using, the screen resolution of their monitor, the domain name of their Internet service provider, and the Internet Protocol (IP) address of the device they are using to access the site.

The data collected is used for individual, group, and/or organizational development. It also may be used for the on-going statistical norming and validation of the survey instrument scales. To that end, we may create data files consisting of the answers of specific groups of respondents to one or more of our surveys (based on team membership or on demographic or positional variables) from multiple organizations. These files would be used to support analyses to improve our surveys and develop and market new products that may be of interest to you, your firm, your industry, and the marketplace. We also use aggregated or archived data to carry out research on individuals, groups, and organizations and publish the results in journals, books, manuals, or other outlets.

Data Formats

Organizational-level data are occasionally shared with the client organization or consultant. Personally identifying data is removed to ensure confidentiality is protected.

Individual feedback reports are provided to the internal program coordinator and/or the participant's assigned coach (internal or external). Group-level reports are provided to the internal program coordinator, the consultant (internal or external), and/or to the individual team members. Organizational-level reports are provided to the internal program coordinator and/or

the consultant (internal or external). Depending on mode of administration, individuals may also receive a summary of their own responses directly.

Principles Protecting Individuals' Privacy

Notice and Choice

To the extent permitted by the **EU – US Privacy Shield** Agreement and US – Swiss 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.

The individual providing data will have the choice to opt out if The Company proposes (A) to disclose personal data to a third party or (B) to allow the personal data to be used for a purpose that is materially different from the purpose for which the data were originally collected. The Company will advise you in advance by email of any such proposal and you can opt out by returning the email to info@humansynergistics.com with “Opt Out” added to the Subject Line or in the body of the message.

Accountability for Onward Transfer

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

- o We have the individual's permission to make the disclosure;
- o The disclosure is required in response to a lawful request by public authorities, including to meet national security of law enforcement requirements;
- o The disclosure is reasonably related to the sale or disposition of all or part of our business;
- o The information in question is publicly available;
- o The disclosure is reasonably necessary for the establishment or defense of legal claims; or
- o 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:
 - o is subject to law providing an adequate level of privacy protection;

o has agreed in writing to provide an adequate level of privacy protection; or
o 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. Human Synergistics, Inc. may be liable for certain onward transfers to third parties.

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 and Purpose Limitation

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

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, or individual would like to limit or restrict their data completely, 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, email address, company name, 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 Privacy Shield Agreement. In some circumstances, we may charge a reasonable fee, where warranted, for access to personal information. Human Synergistics, Inc. recognizes the right of EU individuals to access their personal data.

Human Synergistics, Inc. reserves the right to correct any data collection errors or omissions relating to unit, demographic, or positional variables that would otherwise affect the feasibility or accuracy of any feedback reports.

Recourse, Enforcement and Liability

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) **EU – US Privacy Shield** 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 **EU – US Privacy Shield** 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 **EU – US Privacy Shield** 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

In compliance with the EU - US Privacy Shield Principles, Human Synergistics, Inc. commits to resolve complaints about your privacy and our collection or use of your personal information. European Union individuals with inquiries or complaints regarding this privacy policy should first contact Human Synergistics, Inc. at:

Human Synergistics, Inc.
148 Randhurst Village Drive
Suite 200
Mount Prospect, IL 60056
Phone: 847.590.0995
Fax: 847.590.0997
Email: odile.ambrus@humansynergistics.com

You may also contact our EU office in Deutschland, Germany, Human Synergistics InterConnex, GmbH at:

Email: Silvie.VanEtten@humansynergistics.de

Human Synergistics, Inc. has further committed to refer unresolved privacy complaints under the EU - US Privacy Shield Principles BBB EU PRIVACY SHIELD, a nonprofit alternative dispute resolution provider located in the United States and operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit www.bbb.org/EU-privacy-shield/for-eu-consumers/ for more information and to file a complaint.

Please note that if you are an EU individual whose complaint is not resolved through these channels, under limited circumstances, a binding arbitration option may be available before a Privacy Shield Panel.

In compliance with the US-Swiss Safe Harbor Principles, Human Synergistics, Inc. commits to resolve complaints about your privacy and our collection or use of your personal information. Swiss citizens with inquiries or complaints regarding this privacy policy should first contact Human Synergistics, Inc. as noted in the previous section.

Human Synergistics, Inc. has further committed to refer unresolved privacy complaints under the US-Swiss Safe Harbor to an independent dispute resolution mechanism operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit www.bbb.org/us/safe-harbor-complaints for more information and to file a complaint.