

## **Safe Harbor Principles Privacy Policy**

The Company respects individual privacy and values the confidence of its customers, shareholders, employees, vendors, consumers, business partners, and others. The Company strives to collect, use and disclose Personal Information in a manner consistent with the laws of the countries in which it does business. The Company abides by and is in compliance with the Safe Harbor Principles developed by the U.S. Department of Commerce and the European Commission ("Safe Harbor Principles") and the Frequently Asked Questions ("FAQs") issued by the Department of Commerce on July 21, 2000. The Safe Harbor Principles and FAQs constitute the "Safe Harbor Framework."<sup>1</sup>

This Safe Harbor Privacy Policy ("Policy") sets forth the privacy principles that the Company follows with respect to transfers of Personal Information anywhere in the world, including transfers from the European Economic Area (EEA) to the United States<sup>2</sup>.

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### **I. Definitions**

For purposes of this Policy, the following definitions shall apply:

- (a) "Agent" means any Third Party that uses or collects Personal Information on behalf of the Company at the Company's direction.
- (b) "Company" means the Company, its predecessors, successors, subsidiaries, divisions, and groups.
- (c) "Personal Information" means any information or set of information received by the Company from the EEA (European Economic Area) that identifies or could be used by or on behalf of the Company to identify an individual covered by the Safe Harbor Framework. Personal Information does not include information that is encoded or

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<sup>1</sup> The Safe Harbor Framework was developed to enable US companies to satisfy the requirement under European Union law that adequate protection be given to Personal Information transferred from the EU to the United States.

<sup>2</sup>The European Economic Area ("EEA") (which currently includes the twenty five member states of the European Union ("EU") plus Iceland, Liechtenstein and Norway) also has recognized the US Safe Harbor Principles as providing adequate data protection (OJ L 45, 15.2.2001, p.47).

publicly available information that has not been combined with non-public Personal Information.

(d) "Sensitive Personal Information" means Personal Information that reveals medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, or information specifying the sex life of the individual. In addition, the Company will treat as Sensitive Personal Information, any information received from a Third Party, where that Third Party treats and identifies the information as sensitive.

(d) "Third Party" means any person that is not an employee or Agent of the Company.

## II. Privacy Officer

The Company has designated Heidi K. Hagle, its Vice President of Human Resources, as the Privacy Officer responsible for the Company's compliance with and enforcement of this Policy and current data practices<sup>3</sup>. The Company educates its employees most likely to be in possession of Personal Information concerning compliance with this Policy and has self-assessment procedures in place to assure compliance. The Privacy Officer is available to any of its valued employees, customers, vendors, business partners or others who may have questions concerning this Policy or data security practices.

Questions or complaints regarding this Policy and any privacy-related issue should be submitted by mail or email to the Privacy Officer, as indicated below:

Name	Heidi K. Hagle
Address	27335 W. 11 Mile Road, Southfield, MI 48034 USA
Phone	+1 (248) 213-3643
Fax	+1 (248) 386-4644
Email	hhagle@techtteam.com

## III. Collection and Use of Personal Information

This Policy applies to all Personal Information received by the Company in any format including electronic, paper or verbal. The Company collects and processes Personal Information from current and former employees and their respective family members, as well as applicants for employment, customers, prospective customers, customers' end users (including, but not limited to customers' employees and customers), investors, prospective investors, and vendors through its Internet websites, its Intranet site, electronic mail, and traditional mail. The Company is the sole owner of information it collects from current and former employees, applicants for

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<sup>3</sup> With the cooperation and assistance of appropriate staff and operating people, the Privacy Officer will administer the Company's data protection program, including the Policy and other related policies, direct the monitoring and reporting systems and provide regular written reports, as appropriate to management.

employment, customers, vendors, and others. The information collected by the Company on behalf of its customers is owned by the Company's customer. The Company will not sell or share any of the Personal Information collected with Third Parties in ways different than what is disclosed in this Policy. To the extent necessary, on a global basis, the Company has caused its worldwide affiliates to establish and maintain business procedures that are consistent with this Policy.

Personal Information collected by the Company from employees and applicants for employment is maintained at its corporate offices in Southfield, Michigan in the United States as well as the local office of the employee or applicant.

Personal Information collected by the Company from prospective customers, consumers, vendors, business partners and others may be maintained at its corporate offices in Southfield, Michigan (USA), or at other Company facilities, including customer locations. The Company collects such Personal Information for, among other things, legitimate business reasons such as customer service, product, warranty and claims administration, meeting governmental reporting and records requirements, maintenance of accurate accounts payable and receivable records, internal marketing research, safety and performance management; financial and sales data, and contact information. All Personal Information collected by the Company will be used for legitimate business purposes consistent with this Policy.

Personal Information collected by the Company from its customers' end users, customers, or employees may be maintained at its corporate offices in Southfield, Michigan (USA), or at other Company facilities including customer locations. The Company collects such Personal Information under the instructions of our customers for their legitimate business reasons.

#### **IV. Privacy Principles**

The privacy principles in this Policy are based on the seven Safe Harbor Principles.

**1. Notice:** The Company collects Personal Information for, among other reasons, human resource management such as payroll administration, filling employment positions, maintaining accurate benefits records, meeting governmental reporting requirements, security, health and safety management, performance management, company network access, and authentication. The Company does not request or gather information regarding political opinions, religion, philosophy, or sexual preference. To the extent the Company maintains information on an individual's medical health or ethnicity (only for countries where it is legally required), the Company will protect, secure and use that information in a manner consistent with this Policy and law.

If the Company collects Personal Information directly from individuals, it will inform them about the purposes for which it collects and uses Personal Information about them, the types of non-Agent Third Parties to which the Company discloses that information, and the choices and means the Company offers individuals 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 Company, or as soon as practicable thereafter, and in any event before the Company uses the information for a purpose other than that for which it was originally collected. The Company may disclose Personal Information if required to do so by law or to protect and defend the rights or property of the Company.

**2. Choice:** The Company will offer individuals the opportunity to choose (opt-out) whether their Personal Information is: (a) to be disclosed to a Third Party which is not an Agent; or (b) 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, the Company will give individuals the opportunity to affirmatively and explicitly (opt-in) consent: (a) to the disclosure of the information to a non-Agent Third Party; or (b) the use of the information for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual. The Company will provide individuals with reasonable mechanisms to exercise their choices should requisite circumstances arise.

**3. Data Integrity:** The Company will collect only Personal Information which is relevant for the purposes for which it is to be used. The Company will take reasonable steps to ensure that Personal Information is relevant, accurate, complete, and current, to its intended use.

**4. Transfers to Agents:** The Company will obtain assurances from its Agents that they will safeguard Personal Information consistently with this Policy. Examples of appropriate assurances that may be provided by Agents include: a contract obligating the Agent to provide at least the same level of protection as is required by the relevant Safe Harbor Framework; Safe Harbor certification by the Agent; or the Agent being subject to another European Commission adequacy finding. Where the Company has knowledge that an Agent is using or disclosing Personal Information in a manner contrary to this Policy, the Company will take reasonable steps to prevent or stop the use or disclosure. The Company holds its Agents accountable for maintaining the trust its employees and customers place in the Company.

**5. Access and Correction:** Upon request, the Company will grant individuals reasonable access to Personal Information that it holds about them. In addition, the Company will take reasonable steps to permit individuals to correct, amend, or delete information that is demonstrated to be inaccurate or incomplete. Any employee that desires to review or update his or her Personal Information can do so by contacting their local human resources representative. If the employee is not satisfied with the response of the local human resources representative, the employee should submit a written description of the matter to the Privacy Officer.

**6. Security:** The Company will take reasonable precautions to protect Personal Information in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction. The Company limits access to Personal Information and data to those persons in the Company's organization, or as Agents of the Company, that have a specific business purpose for maintaining and processing such Personal Information and data. Any individuals who are granted access to Personal Information will have been made aware of their responsibilities to

protect the security, confidentiality, and integrity of that information and will have been provided training and instruction on how to do so.

**7. Enforcement:** The Company will conduct annual compliance audits of its relevant privacy practices to verify adherence to this Policy and the Safe Harbor Principles. The audit will be conducted under the direction of the Privacy Officer. Any employee that the Company determines is in violation of this Policy will be subject to disciplinary action up to and including termination of employment. Any Agent or Third Party that violates this Policy shall be in material breach of all agreements with the Company and shall defend and indemnify the Company from claims related to such violations.

Any questions or concerns regarding the use or disclosure of Personal Information should be directed to the Company Privacy Officer. The Company 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. For complaints that cannot be resolved between the Company and the complainant, the Company has agreed to participate in the dispute resolution procedures of the American Arbitration Association (“AAA”) in accordance with its applicable commercial rules as well as the Safe Harbor Principles; provided further that any arbitrator shall be either an attorney or retired judge having significant and recognized experience with, and knowledge of, privacy issues and information technology. In addition, the location for such arbitration shall be Detroit, Michigan (USA). All decisions of the arbitration panel shall be final and binding on the parties, which waive any right to further appeal the arbitration award, to the extent an appeal may be lawfully waived. Further, the Company will use the European Data Protection Authorities (DPA) as its independent recourse mechanism with respect to European Union human resources data.

The Company is also subject to the jurisdiction of the US Federal Trade Commission. The Federal Trade Commission may be contacted at the following address:

Federal Trade Commission  
Attn: Consumer Response Center  
600 Pennsylvania Avenue NW  
Washington, DC 20580  
USA  
consumerline@ftc.gov  
www.ftc.gov

## **V. Effective Date and Changes to this Safe Harbor Privacy Policy**

The practices described in this Policy are the current Personal Information protection policies as of March 1, 2005. It shall be posted on the Company website at [www.techteam.com](http://www.techteam.com). The Company reserves the right to modify or amend this Policy at any time consistent with the requirements of the Safe Harbor Principles. Appropriate public notice will be given concerning such amendments.