

INTEGREON is strongly committed to protecting the privacy of all those who entrust it with personal information. INTEGREON has certified to the Safe Harbor Agreement between the United States and the European Union that it will respect and protect all personal data processed as part of its knowledge process outsourcing, business process outsourcing and all other manners of business it conducts. Accordingly, INTEGREON adheres to the Safe Harbor privacy principles and frequently asked questions, as agreed to by the U.S. Department of Commerce and the European Commission.

SCOPE

This Policy applies to all personal information received from countries in the European Economic Area (EEA) by INTEGREON in the United States in any format, including electronic, paper, or verbal, that is collected or received in managing its workforce and in conducting outsourcing activities.

DEFINITIONS

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

"Agent" means any third party that collects or uses personal information under the instructions of, and solely for, INTEGREON or to which INTEGREON discloses personal information for use on INTEGREON's behalf.

"INTEGREON" means INTEGREON MANAGED SOLUTIONS, INC., its subsidiaries, divisions, groups and affiliates in the United States or any foreign country.

"Personal information" or "personal data" means any information or set of information that identifies or is used by or on behalf of INTEGREON to identify an individual. Personal information does not include information that is encoded or anonymized, or publicly available information that has not been combined with non-public personal information.

"Sensitive personal information" means personal information that reveals race, ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, or that concerns health or sex life. In addition, INTEGREON will treat as sensitive personal information any information received from a third party where that third party treats and identifies the information as sensitive.

PRIVACY PRINCIPLES

The privacy principles in this Policy are based on the Safe Harbor Principles and apply to INTEGREON's use of personal data in its activities.

NOTICE

Where INTEGREON collects personal information from customers, individuals, or other entities, hereinafter ("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 INTEGREON discloses that information, and the choices and means, if any, INTEGREON offers such parties 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 INTEGREON, or as soon as practicable thereafter, and in any event before INTEGREON uses or discloses the information for a purpose other than that for which it was originally collected.

Where INTEGREON receives personal information from its subsidiaries, affiliates or other entities, it will use and disclose such information in accordance with the notices provided by such entities and the choices made by the individuals to whom such information relates.

CHOICE

INTEGREON will offer individuals the opportunity to choose (opt-out) whether personal information is (a) to be disclosed to a non-agent third party, 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, INTEGREON will give individuals the opportunity to affirmatively and explicitly consent (opt-in) to the disclosure of the information to a non-agent third party or the use of the information for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual. INTEGREON will provide individuals with reasonable mechanisms to exercise their choices.

DATA INTEGRITY

INTEGREON will use personal information only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual. INTEGREON will take reasonable steps to ensure that personal information is relevant to its intended use, accurate, complete, and current.

TRANSFERS TO AGENTS

INTEGREON will obtain assurances from its agents that they will safeguard personal information consistent 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 Principles, being subject to EU Directive 95/46/EC (the EU Data Protection Directive), Safe Harbor certification by the agent, or being subject to another European Commission adequacy finding (e.g., companies located in Hungary and Switzerland). Where INTEGREON has knowledge that an agent is using or disclosing personal information in a manner contrary to this Policy, INTEGREON will take reasonable steps to prevent or stop the use or disclosure.

ACCESS AND CORRECTION

Upon request, INTEGREON will grant individuals reasonable access to personal information that it holds about them. In addition, INTEGREON will take reasonable steps to permit individuals to correct, amend, or delete information that is demonstrated to be inaccurate or incomplete.

SECURITY

INTEGREON will take reasonable precautions to protect personal information in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction.

ENFORCEMENT

INTEGREON will conduct compliance audits of its relevant privacy practices to verify adherence to this Policy. Any employee that INTEGREON determines is in violation of this policy will be subject to disciplinary action up to and including termination of employment.

DISPUTE RESOLUTION

Any questions or concerns regarding the use or disclosure of personal information should be directed to the INTEGRÉON Privacy Office at the address given below. INTEGRÉON 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 INTEGRÉON and the complainant, INTEGRÉON has agreed to participate in the dispute resolution procedures of the panel established by the European data protection authorities to resolve disputes pursuant to the Safe Harbor Principles. The American Arbitration Association (hereinafter "AAA") has an established process for companies certifying Safe Harbor compliance. The AAA program provides a streamlined process for U.S. companies to comply with European privacy laws. INTEGRÉON will submit to the jurisdiction of the American Arbitration Association in the event of a dispute or consumer complaint.

LIMITATION ON APPLICATION OF PRINCIPLES

Adherence by INTEGRÉON to these Safe Harbor Principles may be limited (a) to the extent required to respond to a governmental, legal, national security, public interest, or ethical obligation; and (b) to the extent expressly permitted by an applicable law, rule or regulation.

INTERNET PRIVACY

INTEGRÉON sees the Internet and the use of other technologies as valuable tools for communicating and interacting with employees, business partners, and others. INTEGRÉON recognizes the importance of maintaining the privacy of information collected online and has created a specific Internet Privacy Policy (the "IPP") governing the treatment of personal information collected through web sites that it operates. With respect to personal information that is transferred from the European Economic Area to the U.S., the IPP is subordinate to this Policy. However, the IPP also reflects additional legal requirements and evolving standards with respect to Internet privacy.

CONTACT INFORMATION

Questions or comments regarding this Policy should be submitted to the INTEGRÉON Corporate Office by mail as follows:

INTEGRÉON MANAGED SOLUTIONS, INC.

1901 Avenue of the Stars

Suite 1080

Los Angeles, CA 90067

Attn: Legal Department/Safe Harbor

CHANGES TO THIS SAFE HARBOR PRIVACY POLICY

This Policy may be amended from time to time, consistent with the requirements of the Safe Harbor Principles. A notice will be posted on the INTEGRÉON web page (www.Integreon.com) for 60 days whenever this Safe Harbor Privacy Policy is changed in a material way.