

# EU Safe Harbor Privacy Statement

This Statement describes how Vangent, Inc. ('Vangent') collects, uses, and discloses certain personally identifiable information that it receives in the United States from the European Union ("EU Personal Data"). In particular, Vangent recognizes that the European Union has established strict protections regarding the handling of EU Personal Data, and Vangent therefore has elected to adhere to, and is in compliance with, the US-EU Safe Harbor Privacy Principles ('EU Safe Harbor') with respect to such EU Personal Data that it receives in the United States. For further background and information about the EU Safe Harbor, and to see Vangent's representation on the Safe Harbor List, please refer to the U.S. Department of Commerce's website at [www.export.gov/safeharbor](http://www.export.gov/safeharbor).

## Categories of Individual Data Subjects

In general, Vangent may obtain EU Personal Data in the United States about several different types of individuals, including (i) website visitors, (ii) clients, suppliers, and business partners, (iii) candidates for employment with clients, (iv) individuals contacting one of Vangent's multi-channel contact centers, and (v) Vangent's own employees. Vangent's practices with respect to each of these types of individual data subjects are described below.

## Clients, Suppliers, Business Partners and Individuals Contacting one of Vangent's Multi-channel Contact Centers

Vangent may obtain various types of EU Personal Data about employees and agents of our clients, suppliers, and business partners. Such data may include contact information (names, titles, addresses, phone and fax numbers, and email addresses); information about products and services ordered or provided; financial and payment information; user ID, passwords, and information collected through Internet-based and other transaction-related data. In addition, Vangent may obtain EU personal Data from individuals contacting one of Vangent's multi-channel contact centers. Such data may include personal health information and contact information.

Vangent may use these types of EU Personal Data for business purposes, including to deliver or provide products or services; to establish or maintain client and business relationships; to provide access to Internet-based activities; to perform accounting functions; and to conduct other activities as necessary or appropriate in connection with the servicing and development of the business relationship.

Employees and agents of our clients, business partners, and suppliers may contact us if any of their EU Personal Data changes, or if they would like to access and correct EU Personal Data that we maintain about them. However, such persons might first wish to contact their local human resources representative (i.e. the human resources representative within our Clients), as that might be the most efficient means of addressing their issues.

## Candidates for Employment with Clients

Vangent provides a wide variety of services and solutions to its business clients ('Clients') that facilitate the selection, hiring, and internal mobility of individual candidates for specific employment ('Candidates'). In some instances, Vangent may obtain access to EU Personal Data about such Candidates in the course of providing the services and solutions. In other specific instances, Vangent may also obtain access to data about our Clients' existing employees or end users in the course of providing support services to the Clients ('End Users'). Such data may include contact details, work history, educational history, work preferences, and other information, depending on the particular Client and application at issue.

Wherever we obtain access to EU Personal Data about Candidates or End Users, we are acting as a data processor on behalf of our Clients, and we therefore conduct such activities strictly in accordance with their instructions and pursuant to our contractual arrangements with them. If you are a Candidate for employment with one of our Clients, or an End User with an existing relationship with one of our Clients, you should refer to the Client's website or human resources manager to understand the privacy practices that apply to EU Personal Data that we may maintain about you. Moreover, if you would like to access and review your EU Personal Data, you should contact our Client (your potential or existing employer) with any such requests. We will cooperate as appropriate with requests from our Clients to assist with such responses.

## Other Necessary Disclosures

Vangent may disclose EU Personal Data to business partners and subcontractors as necessary in connection with the performance of requested services or solutions, or for other purposes compatible with the purposes for which the information was received. Vangent may also disclose EU Personal Data as necessary in connection with the sale or transfer of all or part of the business. In these situations, Vangent will require the recipient of the data to protect the data in accordance with the relevant principles in the EU Safe Harbor, or otherwise take steps to ensure that the EU Personal Data is appropriately protected.

#### *Onward Transfer (Transfers To Third Parties)*

Except as otherwise explained in this notice, Vangent will forward your Personal Information only to (a) an entity that you have specifically authorized to receive the data (and its designated representatives), or (b) to one of Vangent's authorized third-party representatives (e.g., service providers that help host or support Vangent's web site, or that otherwise provide technical assistance). Vangent will transfer to an authorized representative only the Personal Information needed to deliver to Vangent the requested product or service. The authorized representative will be prohibited from using your Personal Information for any other purpose and will be required to maintain commercially reasonable security measures to protect the confidentiality and security of that Personal Information.

#### *Opportunity To Opt Out*

Vangent will notify you before (a) transferring your Personal Information to any third party other than an authorized representative, or (b) using your Personal Information for a purpose that is incompatible with the purposes described above. That notice will provide you with instructions on how you can opt out of the disclosure or use.

If Vangent collects your 'sensitive personal information' (i.e., health, race or ethnic origin, political opinions, religious or philosophical beliefs, sex life, trade union membership), Vangent will not (a) disclose that information to a third party other than an authorized representative, or (b) use that information for a purpose other than that for which the information originally was collected unless you provide your prior, explicit consent.

Your opting out of, or refusing to consent to, a particular use or disclosure does not mean that Personal Information already collected will be erased or deleted or that Vangent cannot continue to use or disclose the information for the purposes compatible with those for which the information originally was collected.

#### **Security**

Vangent takes reasonable technical and organizational measures to protect the security of our users' Personal Information. When our contact form or seminar sign-up form asks users to enter Personal Information, that information is encrypted and protected with the encryption software standard in the industry - SSL. While on a secure page, such as our contact form, the lock icon on the bottom of Web browsers such as Netscape Navigator and Microsoft Internet Explorer becomes locked, as opposed to un-locked, or open, when you are just 'surfing'. Vangent uses Network solutions for our SSL certificates. To learn more about SSL, please visit <http://www.networksolutions.com/SSL-certificates/how-ssl-works.jsp>.

While we use SSL encryption to protect certain financial information online, we also take reasonable steps to protect user information off-line. All of our users' Personal Information, not just the financial information mentioned above, is subject to restricted access in our offices. Only employees who need the information to perform a specific job (for example, a customer service representative or sales representative) are granted access to Personal Information. Our employees must use passwords to gain access to Personal Information. Furthermore, all employees are regularly informed about our security and privacy practices. When new policies are added, our employees are notified and/or reminded about the importance we place on privacy, and what they can do to protect our users' and customers' Personal Information. Finally, we maintain reasonable physical, technical and organizational measures to make sure that the servers on which we store Personal Information are kept in an access restricted, physically secure, and monitored environment.

#### *Data Integrity*

Vangent collects only Personal Information that is necessary for the purposes described above and compatible purposes. Vangent takes reasonable steps to ensure that the information it collects is accurate, complete, current, and reliable for its intended use.

#### **Enforcement**

Vangent monitors its compliance with its EU Safe Harbor Policy by in-house verification.

European Union citizens with inquiries or complaints regarding this Privacy Policy should first contact Vangent at:

[HCMFeedback@vangent.com](mailto:HCMFeedback@vangent.com)

If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed by Vangent, please visit the BBB EU SAFE HARBOR web site at [www.bbb.org/us/safe-harbor-complaints](http://www.bbb.org/us/safe-harbor-complaints) for more information and to file a complaint.

Disputes involving human resources data as defined by the Safe Harbor Agreement:

**Data Protection Panel Secretariat**

Rue de Luxembourg 46 (01/126)  
B-1000 Brussels, BELGIUM

You can obtain the Secretariat's complaint at the following URL:  
<http://forum.europa.eu.int/Public/irc/secureida/Home/main>

**Notification of Changes**

If we decide to make material changes to our privacy policy, we will post those changes here, on the homepage, and other places we deem appropriate so our users are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. We will use information in accordance with the privacy policy under which the information was collected. If, however, we are going to use users' personally identifiable information in a manner different from that stated at the time of collection we will notify our hosted recruitment software customers and/or our website users as appropriate via email and/or by posting a notice on our website for 30 days.

**Legal Disclaimer**

We may disclose Personal Information when required by law or in the good faith belief that such action is necessary in order to conform to the edicts of the law, comply with legal mandates, enforce the terms of use of our websites, or to protect the rights, property, or personal safety of Vangent, its users and the public.

**Questions**

If you have any questions about this EU Safe Harbor Privacy Statement, or if you would like to request access to EU Personal Data that we may maintain about you, please contact us as follows:

**Vangent Inc.**

Email: Vangent Privacy Office ([hcmprivacy@vangent.com](mailto:hcmprivacy@vangent.com))

Any questions regarding this EU Safe Harbor Privacy Statement should first be directed to the Vangent contact above. If you do not receive acknowledgment of your inquiry or your inquiry has not been satisfactorily addressed, you may then contact the local data protection authorities in your EU member state for further information.

*Effective: July 14, 2008*