

Dober respects individual privacy and values the confidence of its customers, employees, consumers, business partners and others. Not only does Dober strive to collect, use and disclose personal information in a manner consistent with the laws of the countries in which it does business, but it also has a tradition of upholding the highest ethical standards in its business practices. This Safe Harbor Privacy Policy (the "Policy") sets forth the privacy principles Dober follows with respect to transfers of personal information from the European Economic Area (EEA) (which includes the twenty-eight member states of the European Union (EU) plus Iceland, Liechtenstein and Norway) and from Switzerland to the United States.

**SAFE HARBOR:** The United States Department of Commerce and the European Commission have agreed on a set of data protection principles and frequently asked questions to enable U.S. companies to satisfy the requirement under European Union law that adequate protection be given to personal information transferred from the EEA to the United States (the "U.S.-EU Safe Harbor"). The EEA also has recognized the U.S.-EU Safe Harbor as providing adequate data protection (OJ L 45, 15.2.2001, p.47). The United States Department of Commerce and the Federal Data Protection and Information Commissioner (FDPIIC) of Switzerland have agreed on a similar set of principles and frequently asked questions to enable U.S. companies to satisfy the requirement under Swiss law that adequate protection be given to personal information transferred from Switzerland to the United States (the "U.S.-Swiss Safe Harbor"). Consistent with its commitment to protect personal privacy, Dober adheres to the principles set forth in the U.S.-EU Safe Harbor and the U.S.-Swiss Safe Harbor (the "Safe Harbor Principles").

To learn more about the Safe Harbor program, and to view Dober's certification, please visit <http://www.export.gov/safeharbor/>.

**SCOPE:** This Policy applies to all personal information received by Dober in the United States from the EEA in any format, including electronic, paper or verbal.

**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, Dober or to which Dober discloses personal information for use on Dober's behalf.

"Dober" means Dober, its subsidiaries, divisions, groups and affiliates in the United States.

"Personal information" means any information or set of information that identifies or is used by or on behalf of Dober 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, Dober 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 PRINCIPLE:** The privacy principles in this Policy are based on the Safe Harbor Principles.

**NOTICE:** Where Dober collects personal information directly from individuals in the EEA, 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 Dober discloses that information, and the choices and means, if any, Dober 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 Dober, or as soon as practicable thereafter, and in any event before Dober uses or discloses the information for a purpose other than that for which it was originally collected.

Where Dober receives personal information from its subsidiaries, affiliates or other entities in the EEA, 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 personal information relates.

**CHOICE:** Dober will offer individuals the opportunity to choose (opt-out) whether their 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, Dober 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. Dober will provide individuals with reasonable mechanisms to exercise their choices.

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

**TRANSFERS TO AGENTS:** Dober 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 Dober has knowledge that an agent is using or disclosing personal information in a manner contrary to this Policy, Dober will take reasonable steps to prevent or stop the use or disclosure.

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

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

**ENFORCEMENT:** Dober will conduct compliance audits of its relevant privacy practices to verify adherence to this Policy. Any employee that Dober 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 Dober Privacy Office at the address given below. Dober 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. Dober has further committed to refer unresolved privacy complaints under the Safe Harbor Principles to an independent dispute resolution mechanism, the BBB EU SAFE HARBOR, 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 by Dober, you may contact the BBB EU SAFE HARBOR program at the address below:

Council of Better Business Bureaus, Inc.

BBB EU SAFE HARBOR

[www.bbb.org/us/safe-harbor-complaints](http://www.bbb.org/us/safe-harbor-complaints)

To learn more about the Safe Harbor program, and to view Dober's certification, please visit

<http://www.export.gov/safeharbor/>.

**LIMITATION ON APPLICATION OF PRINCIPLES:** Adherence by Dober to these Safe Harbor Principles may be limited (a) to the extent required to respond to a legal or ethical obligation; and (b) to the extent expressly permitted by an applicable law, rule or regulation.

**INTERNET PRIVACY:** Dober sees the Internet and the use of other technologies as valuable tools for communicating and interacting with employees, business partners, and others. Dober 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 Dober Corporate Office by mail as follows:

**Dober**

11230 Katherine's Crossing

Woodridge, IL 60517

Attn: Safe Harbor

Or by email to [doberprivacy@dobergroup.com](mailto:doberprivacy@dobergroup.com) .

**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 Dober

web page ([www.dobergroup.com](http://www.dobergroup.com)) for 60 days whenever this Safe Harbor Privacy Policy is changed in a material way.