

# PRIVACY POLICY

This Privacy Policy defines Company objectives for securing and protecting personally identifiable information and other information.

The types of personal data includes names, addresses, phone numbers, birthdates, Social Security numbers, tax identification numbers, national insurance numbers and financial account numbers.

[Please click here for our Privacy Shield Policy](#)

## **POLICY/PROCEDURE**

### I. OBJECTIVES

- A. The Company adheres to federal, state, and local regulatory and customer privacy requirements.
- B. The Company collects personally identifiable information when voluntarily submitted by our online and onsite visitors. The information provided is used to fulfill specific requests, unless given permission to use it in another manner.
- C. In connection with services we provide, the Company may collect the following types of information:
  - Personally Identifiable Information. Names, addresses, email addresses, phone numbers, birthdates, social security, tax identification, financial account and national insurance numbers company information,
  - Cookies. When a visitor views Company websites, a cookie is sent out to the viewer's Computer that will identify the visitor's browser. These cookies enable the website to recognize the visitor's computer the next time the visitor views the Company website. These cookies will be used exclusively to collect information concerning the use of the website. Cookies contain no personally identifiable data, so the visitor personally identifiable information is not collected or retained.
  - User Communications. When a visitor sends an email or other communication to the Company, these communications may be retained in order to process inquiries, respond to requests, and improve overall services.
  - Affiliated Websites. Personal information that a visitor may provide to websites affiliated with the Company may be sent to the Company in order to deliver a services the Company or other entities affiliated with the Company provides. The Company processes such information in accordance with this Policy.
- D. The Company reserves the right to collect and process personal information in the course of providing services to our clients without the knowledge of individuals involved. Where the Company collects personal information from individuals within the European Union, upon request, the Company will inform them about the types of personal information collected from them, the purposes for which it was collected, and uses of the information, and the types of non-agent third parties to which the Company discloses that information.
- E. As a general rule, the Company will not disclose personally identifiable information except when the Company is required or permitted per customer agreement, law (including pursuant to national security or law enforcement requirements) or otherwise, such as when the Company believes in good faith that

the law requires disclosure or other circumstances outlined in this Privacy Policy require or permit disclosure. Examples of when the Company may share information are as follows:

- The Company may share information with governmental agencies or other companies assisting in fraud prevention or investigation. The Company may do so when: (1) permitted or required by law; (2) trying to protect against or prevent actual or potential fraud or unauthorized transactions, or, (3) investigating fraud which has already taken place. This information however, is not provided to these companies for marketing purposes.
  - Permitted transfers of information, either to third parties or within the Company, include the transfer of information from one jurisdiction to another, including transfers to the United States from other countries, including the European Union and Switzerland, and from the United States to other countries, including the European Union and Switzerland. Subject to applicable legal requirements, including in the European Union and Switzerland, personal information may be transferred to a jurisdiction where the laws provide less or different protection than the jurisdiction in which the personal information is collected or accessed.
- F. The Company takes reasonable steps to protect personally identifiable information. To prevent unauthorized access or disclosure of personally identifiable information, maintain data accuracy, and support the appropriate use and confidentiality of personally identifiable information, either for its own purposes or on behalf of our clients, the Company has put in place appropriate physical, technical, and managerial procedures to safeguard and secure the personally identifiable information and data the Company possesses.
- G. The Company collects and maintains personally identifiable information in a manner that is compatible with the purpose for which it was collected and maintained, or as subsequently authorized by an individual or client. To the extent necessary for such purposes, the Company takes reasonable steps to confirm that personal information is accurate and complete with regard to its intended use.
- H. The Company complies with the EU-U.S. Privacy Shield Framework and the Swiss – U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States, respectively. The Company has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms 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, please visit <https://www.privacyshield.gov/>.
- I. Rust Consulting receives EU and Switzerland personal data from its customers which is transferred to the U.S. for processing and handling, as applicable, and transfers back to the EU and Switzerland fully composed data (including such personal data) for print, notification, and distribution services within the EU and Switzerland. In certain cases, such personal data is received or processed by third parties in the U.S. for storage and other services.
- J. The Company utilizes a self-assessment approach support compliance with this Privacy Policy.
- The Company periodically verifies that related policies are accurate, comprehensive for the information intended to be covered, prominently displayed, implemented, and are in conformity with the principles of this Privacy Policy.
  - The Company encourages interested persons to raise any concerns with the Company. 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 Privacy Policy.
  - With respect to any complaints relating to this Privacy Policy that cannot be resolved through our internal processes, the Company has agreed to participate in the dispute resolution procedures of the panel established by the European Union Data Protection Authorities to resolve disputes pursuant to the Privacy Shield Principles.
  - If the Company, the European Data Protection Authorities, or other qualified government agencies determines that the Company has not complied with this Privacy Policy, the

Company shall take appropriate steps to address any adverse effects related to non-compliance and to promote future compliance.

- If the Company determines an employee is in violation of this Privacy Policy, that employee will be subject to the Company's disciplinary process.
- K. In the event that the Company merges, is acquired by or sells its assets to a third party, the Company may disclose personally identifiable information as is reasonably necessary in connection with any such merger, acquisition or sale. Any such party with whom the Company merges or whom it acquires some or all of the assets of the Company may not have the same or similar privacy guidelines as set forth in this Privacy Policy and may use personally identifiable information in a manner other than as set forth herein.
- L. This Privacy Policy shall be reviewed annually and updated as necessary to comply with applicable regulations.
- M. The Company will post any revised Privacy Policy on its website, or a similar website that replaces that website.
- N. Information obtained from or relating to clients or former clients is further subject to the terms of any privacy notice provided to the client, any contract or other agreement with the client, and applicable enforcement laws.
- O. The Company will cooperate with the appropriate regulatory authorities, including local data protection regulatory authorities, to resolve any complaints regarding the transfer of personal data that cannot be resolved between the Company and an individual.