



## **Advanced Insights**

### **Safe Harbor Privacy Policy**

**January 1, 2012**

Advanced Insights consistently strives to develop new and innovative products and services as part of our commitment to better serve our customers. We recognize that privacy is an important issue, so we operate ourselves in a manner consistent with the protection of your privacy. We developed this Privacy Policy pursuant to applicable law regarding the collection and use of Personally Identifying Information in those jurisdictions where we do business. This statement includes both Advanced Insights' European Union – U.S. Safe Harbor Privacy Statement and the Website Privacy Statement. We urge you to read the Privacy Policy in its entirety and hope it will help you make an informed decision about sharing your Personally Identifying Information with us.

#### **SAFE HARBOR**

The Safe Harbor Program is a voluntary self-certification process for companies operating in the United States. Companies that certify represent that they adhere to the privacy standards for Personally Identifying Information received from the European Union that have been jointly accepted by the European Union Commission and the U.S. Department of Commerce. Personally Identifying Information that Advanced Insights receives from the European Economic Union will be handled in accordance with the Safe Harbor Principles. Advanced Insights complies with the U.S.-EU Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries. Advanced Insights has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program and to view Advanced Insights' certification, please visit <http://www.export.gov/safeharbor>. For more information about the Safe Harbor Principles, please visit the U.S. Department of Commerce's Website at [http://www.export.gov/safeharbor/eu/eg\\_main\\_018476.asp](http://www.export.gov/safeharbor/eu/eg_main_018476.asp).

#### **SCOPE**

This policy applies to all Personally Identifying Information received by Advanced Insights in the United States from the European Economic Union in any format including electronic, paper or verbal.

#### **PRIVACY PRINCIPLES**

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

## **NOTICE**

Our Privacy Policy applies to all websites owned and operated by Advanced Insights and to any Personally Identifying Information collected by Advanced Insights. Where Advanced Insights collects personal information directly from individuals in the European Union, it will inform them about the purpose for which it collects and uses Personally Identifying Information. Advanced Insights will notify individuals how to contact us with any inquiries or complaints, the types of third parties we may share their Personally Identifying Information with, and the choice and means Advanced Insights offers for limiting the use and disclosure of their Personally Identifying Information.

## **CHOICE**

Even after you have granted Advanced Insights your consent to collect Personally Identifying Information, you may opt-out of having your Personally Identifying Information collected. Advanced Insights will offer individuals the opportunity to choose (opt-out) whether their Personally Identifying Information is to be disclosed to a third party, or to be used for a purpose other than for which it was originally collected or subsequently authorized by the individual.

## **ONWARD TRANSFER**

Advanced Insights will only transfer Personally Identifying Information about individuals to third parties where the third party has satisfactorily assured Advanced Insights that it will protect the Personally Identifying Information consistent with this Policy, or if they are located in the European Union or a country considered adequate for privacy by the European Union Commission, therefore required to comply with European Union data protection laws or substantially equivalent privacy laws, or the third party is Safe Harbor certified.

Advanced Insights will provide reasonable mechanisms for individuals to exercise their choice regarding their Personally Identifying Information.

## **ACCESS**

Upon request, Advanced Insights will grant individuals reasonable access to their Personally Identifying Information. Advanced Insights will take reasonable steps to enable an individual to review their Personally Identifying Information in order to amend, correct or delete information.

## **SECURITY**

Advanced Insights will take reasonable precautions to protect European Union Personally Identifying Information in its possession from loss, misuse, unauthorized access, disclosure, alteration and destruction.

## **DATA INTEGRITY**

Advanced Insights uses Personally Identifying Information only in ways that are compatible with the purposes for which it was collected or subsequently authorized by an individual. Advanced Insights will take reasonable steps to ensure that Personally Identifying Information is relevant to its intended use, accurate, complete and current.

## **ENFORCEMENT**

Advanced Insights has established internal mechanisms to verify its ongoing adherence to this Policy. Any questions or concerns regarding the use or disclosure of Personally Identifying Information should be directed to the Advanced Insights Privacy Office at the address given below. Advanced Insights will investigate and attempt to resolve complaints and disputes

regarding the use of Personally Identifying Information in accordance with the principles contained in this Policy. Advanced Insights has also agreed to participate in the dispute resolution program provided by the European Data Authorities.

#### **LIMITATION ON SCOPE OF PRINCIPLES**

Adherence to these Privacy Principles may be limited to the extent required to respond to a legal or ethical obligation, and to the extent expressly permitted by an applicable law, rule or regulation.

#### **CONTACT INFORMATION**

Questions or comments regarding this Policy should be submitted to the following person:

Rhonda L. Weeks  
Principal  
12061 Lake Avenue  
Lakewood, Ohio 44107  
216-529-1190  
216-227-1632 fax

#### **CHANGES TO THIS SAFE HARBOR PRIVACY POLICY**

This Policy may be amended periodically, consistent with the requirements of the Safe Harbor Principle. A notice will be available upon request.