



## **CPA Global North America LLC SAFE HARBOR PRIVACY POLICY**

### **Introduction**

CPA Global North America LLC ("CPA Global") is the US affiliate of the world's leading intellectual property (IP) management and IP software specialist, and an international provider of outsourced legal support services.

Protecting personal data is important to CPA Global. CPA Global and its United States affiliates: Global Support Services LLC, FoundationIP. LLC, CPA Software Solutions (North America) Limited, PortfolioIP LLC, SeekIP LLC, Ipendo Inc., First to File, Inc., CPA Global Patent Research LLC and CPA Global Services US Inc. (hereinafter collectively referred to as "CPA Global," "we," "us," or "our") adhere to the Safe Harbor Agreement concerning the transfer of personal data from the European Union ("EU") and/or Switzerland to the United States of America.

Accordingly, we certify our compliance with the Safe Harbor Privacy Principles (the "Principles"), including notice, choice, onward transfer, security, data integrity, access, and enforcement, as well as the 15 FAQs of the United States/European Union Data Protection Safe Harbor Framework and of the United States/Switzerland Data Protection Safe Harbor Framework (together the "Safe Harbor Framework"), both of which are made available by the U.S. Department of Commerce at <http://www.export.gov/safeharbor>, where our certifications may also be viewed.

If there is any conflict between the policies in this privacy policy (the "Privacy Policy") and the Principles, the Principles shall govern. This Privacy Policy outlines our general policy and practices for implementing the Principles, including the types of information we gather, how we use it, and the notice and choice affected individuals have regarding our use of and their ability to correct that information. This Privacy Policy applies to all personal information, whether in electronic, paper, or verbal format, received by CPA Global directly from individuals in the EU or Switzerland.

### **Definitions**

"Personal Information" or "Information" means information that (1) is transferred from the EU or Switzerland to the United States; (2) is recorded in any form; (3) is about, or pertains to a specific individual; and (4) can be linked to that individual.

"Sensitive Personal Information" means personal information that reveals race, ethnic origin, sexual orientation, political opinions, religious or philosophical beliefs, trade union membership, or that concerns an individual's health.

### **Provisions**

#### **NOTICE**

CPA Global processes Personal Information that comes into CPA Global's possession through electronic methods (email, FTP sites), by accessing the Personal Information internally on source



repositories such as our Enterprise Resource Planning (ERP), Customer Relationship Management (CRM), document databases, billing platforms, or via other technology.

### **Personal Data Collected Via Technology**

To make web based software products and related services more useful to our clients, our servers (which may be hosted by a third party service provider) collect Personal Information, including browser type, Internet Protocol (IP) address (a number that is automatically assigned to a computer when it uses the Internet, which may vary from session to session), domain name, and/or a date/time stamp for use by those web based software products. We also use Cookies (as defined below) and navigational data like Uniform Resource Locators (URL) to gather information regarding the date and time of the visit, as well as the solutions and information for which our clients search and view. We automatically gather this Personal Information and store it in log files each time a person visits our website or accesses his or her account on our network. "Cookies" are small pieces of information that a website sends to a visitor's computer's hard drive while the visitor is viewing a web site. We may use both session Cookies (which expire once the visitor closes the web browser) and persistent Cookies (which stay on visitor's computer until the visitor deletes them) to provide clients with a more personal and interactive experience on our website. Persistent Cookies can be removed by following Internet browser help file directions. If a visitor chooses to disable Cookies, some areas of our website may not work properly.

### **Purpose of Data Use**

CPA Global processes Personal Information for clients, employees, and vendors for an assortment of business related purposes that most frequently support clients' use of our products and services, enable us to manage employees, or adhere to multinational regulations where we conduct business. Examples of the type of activities that support these objectives include client account management, sales support, software support, client issue resolution, compensation analysis, and watchlist screening.

### **Feedback**

If you provide feedback on any of our products or related services to us, we may use such feedback for any purpose, provided we will not associate such feedback with your Personal Information. CPA Global will collect any information contained in such communication and will treat the Personal Information in such communication in accordance with this Privacy Policy.

### **CHOICE**

CPA Global will offer individuals the opportunity to choose (opt out) whether their Personal Information is (1) to be disclosed to a third party or (2) to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual. The Company will not disclose Sensitive Personal Information for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual. CPA Global



shall treat Sensitive Personal Information received from an individual the same as the individual would treat and identify it as Sensitive Personal Information.

## **ONWARD TRANSFERS**

Except as otherwise stated in this policy, we do not generally share the Personal Information collected from our services with other entities. However, we may share Personal Information if we believe in good faith that such disclosure is necessary to (a) comply with relevant laws or to respond to subpoenas or warrants served on CPA Global; (b) protect or defend the rights or property of CPA Global or users of the CPA Global's products or related services; or (c) to support our business objectives described in the Purpose of Data Use section of this policy.

Third party contractors or service providers that may be selected to support the business objectives described in the Purpose of Data Use section of this policy are required not to use the Personal Information that CPA Global may provide other than for the contractually agreed purpose. Third Parties that manage Personal Information in order to perform contracted services on a either a continual contracted basis or an ad-hoc basis that are not otherwise certified to the Safe Harbor Framework are contractually required to abide by the Principles.

## **DATA SECURITY**

CPA Global is committed to protecting the security of our data subject's Personal Information. Therefore, we take reasonable steps to protect the Information from loss, misuse and unauthorized access, disclosure, alteration, and destruction. We use a variety of industry-standard security technologies and procedures to help protect our data subject's Personal Information from unauthorized access, use, or disclosure, such as policies restricting access to Information to authorized personnel, mechanisms to protect Information from interception during transmission, physical safeguards to protect Information stored in electronic or hard copy form, and reviews and audits of our security and operational procedures.

## **DATA INTEGRITY**

CPA Global shall only process Personal Information in a way that is compatible with and relevant to the purpose for which it was collected or authorized by the individual. To the extent necessary for those purposes, CPA Global shall take reasonable steps to ensure that Personal Information is accurate, complete, current, and reliable for its intended use.

## **ACCESS AND CHANGES TO PERSONAL DATA**

Individuals may access and change any of their Personal Information by contacting their CPA Global contact or Human Resources representative. Individuals may correct, amend, or delete inaccurate Information, except where the burden or expense of providing access would be disproportionate to the risks to the privacy of the individual in the case in question or where the rights of persons other than the individual would be violated. Individuals may request deletion of their Personal Information by us, but please note that we may be required (by law or otherwise) to keep this Information and not delete it (or to keep this Information for a certain time, in which case we will comply with the deletion request only after we have fulfilled such requirements).



When we delete any Information, it will be deleted from the active database, but may remain in our archives.

## **ENFORCEMENT**

CPA Global uses a self-assessment approach to assure compliance with this Privacy Policy and periodically verifies that the Privacy Policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented and accessible, and in conformity with the Principles. We encourage interested persons to raise any concerns using the contact information provided. We will investigate and attempt to resolve any complaints and disputes regarding collection, use, or disclosure of Personal Information in accordance with the Principles. EU or Swiss citizens with inquiries, comments, or complaints regarding this Privacy Policy or data collection and processing practices should first contact CPA Global through one of the following channels:

[Compliance@cpaglobal.com](mailto:Compliance@cpaglobal.com);

or

CPA Global Compliance contacts on CPA Global's QualityLibrary,

<http://www.cpaglobal.com/ComplianceOfficerContactInformation/>;

or

CPA Global's Whistleblower Hotline,

<https://secure.ethicspoint.com/domain/media/en/gui/36137/index.html>

CPA Global has further committed to refer unresolved privacy complaints under the Principles to an independent dispute resolution mechanism. Complaints related to human resources data that cannot be resolved between CPA Global and an EU-based employee or prospective employee regarding his or her Personal Information will be handled by the relevant EU Data Protection Authority or a panel established by the European Data Protection Authorities, consistent with the Principles. All other complaints that cannot be resolved between CPA Global and the relevant customer or other data subject will be handled by 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 CPA Global, please visit the BBB EU SAFE HARBOR web site at <http://www.bbb.org/us/european-dispute-resolution/consumer/> for more information and to file a complaint.

### *Amendments*

This privacy policy may be amended from time to time consistent with the requirements of the Safe Harbor Framework. We will post any revised policy on this website.

### *Information Subject to Other Policies*

CPA Global is committed to following the Principles for all Personal Information within the scope of the Safe Harbor Agreements. However, certain information is subject to policies of CPA Global that may differ from the general policies set forth in this privacy policy.



Effective date: May 14, 2013