



PRIVACY POLICY

A wide variety of third parties have entrusted their information to HLP Integration for business purposes, and all workers at HLP Integration must do their best to safeguard the privacy and security of this information. Protecting consumer privacy is important to the HLP Integration. The most important of these third parties is the individual customer; customer account data is accordingly confidential and access will be strictly limited based on business need for such access. HLP Integration will not distribute customer account information to third parties without advance authorization.

HLP Integration adheres to the Safe Harbor Agreement concerning the transfer of personal data from the European Union ("EU") to the United States of America. HLP Integration follows the Safe Harbor Principles published by the U.S. Department of Commerce as defined on their website, <http://export.gov/safeharbor> ("The Principles"). If there is any conflict between this privacy policy and the Principles as set forth by the U.S. Department of Commerce, the Principles shall govern.

This privacy policy outlines HLP Integration's 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 received by HLP Integration. "Personal Information" or "Information" means information that (1) is transferred from the EU to the United States; (2) is in either paper or electronic format; (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 concerns an individual's health.

HLP Integration shall inform an individual of the purpose for which it collects and uses the Personal Information to which the HLP Integration discloses or may disclose that Information. HLP Integration shall provide the individual with the choice and means 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 the company, and in any event before HLP Integration uses or discloses the Information for a purpose other than for which it was originally collected.

HLP Integration will offer individuals the opportunity to choose 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. For Sensitive Personal Information, the HLP Integration will give individuals the opportunity to affirmatively or explicitly (opt out) consent to the disclosure of the information for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual. HLP Integration shall treat Sensitive Personal Information received from an individual the same as the individual would treat and identify it as Sensitive Personal Information.

HLP Integration has taken reasonable steps to protect the Information from loss, misuse and unauthorized access, disclosure, alteration and destruction. HLP Integration has put in place appropriate physical, electronic and managerial procedures to safeguard and secure the Information



from loss, misuse, unauthorized access or disclosure, alteration or destruction such as using encryption or other protocols. Only employees who need the information to perform a specific job are granted access to personally identifiable information. The computers/servers in which HLP Integration stores personally identifiable information are kept in a secure environment. HLP Integration keeps personal information only as long as it is need it for the purposes for which it was collected, or as permitted by law.

HLP Integration only has access to collect information that is voluntarily given to us by our clients or its customers. HLP Integration will not sell or rent this information to anyone. HLP Integration shall only process Personal Information in a way that is compatible with and relevant for the purpose for which it was collected or authorized by the individual or its agents To the extent necessary for those purposes, HLP Integration shall take reasonable steps to ensure that Personal Information is accurate, complete, current and reliable for its intended use. HLP Integration provides ways for you to access your personal information, as required by law, so you can correct inaccuracies.

HLP Integration uses a self-assessment approach to assure compliance with this privacy policy and periodically verifies that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented and accessible and in conformity with the Principles. HLP Integration encourages interested persons to raise any concerns using the contact information provided and will investigate and attempt to resolve any complaints and disputes in accordance with the Principles. If a complaint or dispute cannot be resolved through our internal process, we agree to dispute resolution using (an independent resource mechanism) as a third party resolution provider.

HLP Integration is committed to following the Principles for all Personal Information within the scope of the Safe Harbor Agreement. However, certain information is subject to policies of the company that may differ in some respects from the general policies set forth in this privacy policy.

HLP Integration 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. HLP Integration 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 HLP Integration's certification, please visit <http://www.export.gov/safeharbor/>

This privacy policy may be amended from time to time consistent with the requirements of the Safe Harbor.

Questions, comments or complaints regarding HLP Integration's Safe Harbor Policy or data collection and processing practices or if you feel that HLP Integration is not abiding by this privacy policy, you should contact us immediately via telephone at 202-393-0399 or at:

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