

## PRIVACY POLICY STATEMENT

Acton International, Ltd. ("ACTON") provides this web site as an informational source for its clients and prospective customers. Acton honors the privacy of its clients and visitors to this site. ACTON will uphold the privacy policies set forth by the Direct Marketing Association and the U.S.-EU and the U.S.-Swiss Safe Harbor Privacy Principles as set forth by the U.S. department of Commerce.

ACTON certifies it encourages list management and brokerage clients to comply with the Direct Marketing Association Privacy Policy. This policy provides effective guidelines for honoring and respecting privacy by:

- Providing customers with the opportunity to opt-out of data rental, sale or exchange.
- Honoring a customer's request to be excluded from in-house lists used for marketing purposes. Your name may be removed by telephoning, emailing or writing us.
- Using one or more of the DMA Preference Services (mail, e-mail, and phone) to suppress names from campaigns for individuals who have requested to be excluded from these marketing campaigns.

This Privacy Statement affirms our commitment to keeping your personal information secure.

Our website does not collect the email addresses of the visitors to our website. However, if a visitor to our site requests information, we will collect personal information such as name, company and address for future in-house marketing purposes. Your information is not shared with other organizations for commercial purposes. This information is only used to improve the way we service our clients.

ACTON complies with the U.S.-EU Safe Harbor Framework and the U.S.-Swiss 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 and Switzerland. ACTON 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 ACTON's certification, please visit <http://www.export.gov/safeharbor/>

### **Notice**

Where ACTON collects non-public personal information directly from EU or Swiss data subjects, ACTON provides the individuals with notice regarding the manner and circumstances in which the personal information will be used and transferred to third parties. Where ACTON receives transfers of personal information from the EU or Switzerland to the United States, ACTON requires contractual provisions from the EU or Swiss data controller that the personal information has been provided to ACTON in accordance with the applicable EU Member State or Swiss data protection law to ensure the individuals have been provided with appropriate notice regarding how their information will be used.

### **Choice**

Where ACTON collects non-public personal information directly from EU or Swiss data subjects, ACTON provides the individuals with choice regarding the manner and circumstances in which the personal information will be used and shared with third parties. Where ACTON receives transfers of personal information from the EU or Switzerland to the United States, ACTON requires contractual provisions from the EU or Swiss data controller that the personal information has been provided to ACTON in accordance with the applicable data protection laws to ensure the individuals have been provided with appropriate choice regarding how their information may be used.

### **Onward Transfer**

ACTON complies with the Notice and Choice principles above for all data disclosed or transferred to a third party. In the event ACTON utilizes data processors to perform tasks on behalf of and/or under the instruction of ACTON, Acton requires its data processors to enter into a written agreement with ACTON which requires them to provide the same level of protection that Acton provides.



### **Security**

ACTON maintains physical, electronic and procedural safeguards to protect personal information. ACTON continually monitors access to its systems to detect unauthorized attempts to gain access to information.

### **Data Integrity**

ACTON takes reasonable steps to ensure that personal information is accurate, complete, current, and reliable for its intended use.

### **Access**

An individual may contact ACTON to learn whether or not information data relating to him or her is found in ACTON's databases. This right applies to only personal information about the individual making the request and is subject to other limitations as defined by law, or where the burden or expense of providing access would be disproportionate to the risks related to the privacy of the individual or where the rights of other individuals would be violated.

### **Enforcement**

Individuals who wish to file a complaint or who take issue with ACTON's Safe Harbor policies should contact ACTON's consumer advocate at the following address.

#### **ACTON International**

Box 5266  
Lincoln, NE 68505  
Phone: 402-742-2820  
Email: [info@acton.com](mailto:info@acton.com)  
Website: [www.acton.com](http://www.acton.com)

ACTON's consumer advocate will explain the process to be followed when filing a complaint. Filing a complaint in English will expedite the process.

ACTON has registered under the Direct Marketing Association's safe harbor complaint resolution process. If consumers can't resolve a complaint after contacting ACTON's consumer advocate, they may file a written complaint with the Direct Marketing Association:

#### **The Direct Marketing Association**

Attn: Ethics/Consumer Affairs Department  
1111 19th Street NW Suite 1100  
Washington, DC 20036  
Email: [safeharbor@the-dma.org](mailto:safeharbor@the-dma.org)  
Website: [www.the-dma.org](http://www.the-dma.org)

ACTON is also subject to the jurisdiction of the U.S. Federal Trade Commission. Consumers unable to resolve a complaint through The Direct Marketing Association's Safe Harbor Complaint process may contact the Federal Trade Commission:

#### **Federal Trade Commission**

Attn: Consumer Response Center  
600 Pennsylvania Avenue NW Washington, DC 20580  
Email: [consumerline@ftc.gov](mailto:consumerline@ftc.gov)  
Website: [www.ftc.gov](http://www.ftc.gov)

ACTON agrees to cooperate and comply with local EU and Swiss regulatory and legal authorities to resolve an ACTON associate's dispute concerning human resources data and an alleged breach of the Safe Harbor Privacy Principles.