



E.U. and Switzerland Safe Harbor Privacy Policy

InfoVision21 ("INFO21") offers various information technology solutions including litigation support services, data management, legal indexing/coding, electronic document discovery and data collection services to law firms, government agencies and corporations. Our *Litigation Support Services* division offers solutions related to all aspects of Litigation Readiness and Evidence Management. INFO21's services help customers organize data, reduce risk and provide transparency into electronic discovery processing and review. Protecting the privacy of our clients is of prime importance to INFO21. INFO21 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. INFO21 certifies that it adheres to the Safe Harbor Privacy *Principles* of notice, choice, onward transfer, security, data integrity, access, and enforcement. For additional information about the Safe Harbor program, and to view INFO21's certification, please visit <http://www.export.gov/safeharbor/>

Accordingly, INFO21 follows the Safe Harbor Principles published by the U.S. Department of Commerce (the "*Principles*") with respect to all such data. If there is any conflict between the policies in this 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 received by INFO21 whether in electronic, paper or verbal format.

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.

INFO21 Safe Harbor Principles

Notice and Choice

To the extent permitted by the Safe Harbor Agreement, INFO21 reserves the right to process personal information in the course of providing professional services to our clients without the knowledge of individuals involved. Where we collect, at the direction of our clients, personal information directly from individuals in the E.U. it remains the responsibility of our client to inform the individual of the purposes for which we collect and use it and the types of non-agent third parties to which the information is disclosed. It remains the responsibility of our client to inform those individuals about the choices and means, if any, offered the individuals for limiting the use or disclosure of their information.

Transfers

INFO21 will not disclose an individual's personal information to third parties unless directed by our client or when one or more of the following conditions are true:

- We have the individual's permission to make the disclosure;
- The disclosure is required by law or professional standards;
- The disclosure is reasonably related to the sale or disposition of all or part of our business;
- The information in question is publicly available;
- The disclosure is reasonably necessary for the establishment or defense of legal claims; or
- The disclosure is to another INFO21 entity or to persons or entities providing services on our, or our client's behalf (each a "transferee"), consistent with the purpose for which the information was obtained, if the transferee, with respect to the information in question:
 - ✓ is subject to law providing an adequate level of privacy protection;
 - ✓ has agreed in writing to provide an adequate level of privacy protection; or
 - ✓ subscribes to the *Principles*.

Data Security

INFO21 will take reasonable precautions to protect the information from loss, misuse and unauthorized access, disclosure, alteration and destruction. In addition, INFO21 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. INFO21 cannot guarantee the security of information on or transmitted via the Internet.

Data Integrity

INFO21 will only use Personal Information in a way that is compatible with and relevant for the purpose for which it was collected or authorized by the client. To the extent necessary for those purposes, INFO21 will take reasonable steps to ensure that Personal Information is accurate, complete and current for its intended use.

Access

INFO21 collects and processes data under the instruction and direction of our clients. If an individual becomes aware that information we maintain about that individual is inaccurate, or if an individual would like to update or review his or her information, the individual must contact and coordinate with our client and proceed according to that client's personal information policy.

Enforcement and Correction

INFO21 uses a self-assessment approach to assure its 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*. We encourage interested persons to raise any concerns using the contact information provided and we will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of Personal Information in accordance with the *Principles*.

If a complaint or dispute cannot be resolved through our internal process, we agree to dispute resolution using the EU Data Protection Authorities (DPAs) as a third party resolution provider. To resolve disputes pursuant to the Safe Harbor Principles. In the event it is determined that INFO21 did not comply with this policy, we will immediately take the appropriate steps to address any adverse effects and promote compliance in the future.

Amendments to this Policy

This privacy policy may be amended from time to time, consistent with the requirements of the Safe Harbor. INFO21 will provide an appropriate public announcement about any such amendments via its web site at www.infovision21.com.

Information Subject to Other Policies

INFO21 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 INFO21 that may differ in some respects from the general policies set forth in this privacy policy.

Contact Information

Questions, comments or complaints regarding INFO21's Safe Harbor Policy or data collection and processing practices can be mailed or emailed to:

privacyofficer@infovision21.com

InfoVision21

Attn: Privacy Officer

6077 Frantz Road Ste 105,

Dublin, OH 43017 USA

DATE EFFECTIVE: May 15, 2013