

ADELPHI GROUP

EU-U.S. Privacy Shield: Consumer Privacy Policy

Last Updated: 30th September 2016

ADELPHI GROUP and its operating subsidiaries Adelphi Values, Adelphi Research, Adelphi Communications, Excerpta Medica and The Planning Shop International (collectively, “Adelphi”) respect your concerns about privacy. Adelphi participates in the EU-U.S. Privacy Shield framework (“Privacy Shield”) issued by the U.S. Department of Commerce. Adelphi commits to comply with the Privacy Shield Principles with respect to Consumer Personal Data the company receives from the EU in reliance on the Privacy Shield. This Policy describes how Adelphi implements the Privacy Shield Principles for Consumer Personal Data.

For purposes of this Policy:

“Consumer” means any natural person who is located in the EU, but excludes any individual acting in his or her capacity as an Employee.

“Controller” means a person or organization which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.

“Employee” means any current, former or prospective employee, temporary worker, intern or other non-permanent employee of any subsidiary or affiliate of Adelphi, who is located in the EU.

“EU” means the European Union and Iceland, Liechtenstein and Norway.

“Personal Data” means any information, including Sensitive Data, that is (i) about an identified or identifiable individual, (ii) received by Adelphi in the U.S. from the EU, and (iii) recorded in any form.

“Privacy Shield Principles” means the Principles and Supplemental Principles of the Privacy Shield.

“Processor” means any natural or legal person, public authority, agency or other body that processes Personal Data on behalf of a Controller.

“Sensitive Data” means Personal Data specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, sex life, the commission or alleged commission of any offense, any proceedings for any offense committed or alleged to have been committed by the individual or the disposal of such proceedings, or the sentence of any court in such proceedings.

“Supplier” means any supplier, vendor or other third party located in the EU that provides services or products to Adelphi.

Adelphi’s Privacy Shield certification, along with additional information about the Privacy Shield, can be found at <https://www.privacyshield.gov/>. For more information about Consumer Personal Data processing with respect to information obtained through Adelphi’s website, please visit the [Online Privacy Notice](#).

Types of Personal Data Adelphi Collects

Adelphi collects Personal Data directly from Consumers. This collection occurs, for example, when a Consumer visits Adelphi's website. The company may use this information for the purposes indicated in the [Online Privacy Notice](#).

The types of Consumer Personal Data Adelphi collects includes:

Contact information, such as name, postal address, email address and telephone number; and

Personal Data in content Consumers provide on Adelphi's website and other data collected automatically through the website (such as IP addresses, browser characteristics, device characteristics, operating system, language preferences, referring URLs, information on actions taken on our website, and dates and times of website visits).

In addition, Adelphi obtains Personal Data, such as contact information and financial account information, of its Suppliers' representatives. Adelphi uses this information to manage its relationships with its Suppliers, process payments, expenses and reimbursements, and carry out Adelphi's obligations under its contracts with the Suppliers.

Adelphi also may obtain and use Consumer Personal Data in other ways for which Adelphi provides specific notice at the time of collection.

Adelphi's privacy practices regarding the processing of Consumer Personal Data comply with the Privacy Shield Principles of Notice; Choice; Accountability for Onward Transfer; Security; Data Integrity and Purpose Limitation; Access; and Recourse, Enforcement and Liability.

Notice

Adelphi provides information in this Policy and the [Online Privacy Notice](#) about its Consumer Personal Data practices, including the types of Personal Data Adelphi collects, the types of third parties to which Adelphi discloses the Personal Data and the purposes for doing so, the rights and choices Consumers have for limiting the use and disclosure of their Personal Data, and how to contact Adelphi about its practices concerning Personal Data.

Relevant information also may be found in notices pertaining to specific data processing activities.

Choice

Adelphi generally offers Consumers the opportunity to choose whether their Personal Data may be (i) disclosed to third-party Controllers or (ii) used for a purpose that is materially different from the purposes for which the information was originally collected or subsequently authorized by the relevant Consumer. To the extent required by the Privacy Shield Principles, Adelphi obtains opt-in consent for certain uses and disclosures of Sensitive Data. Consumers may contact Adelphi as indicated below regarding the company's use or disclosure of their Personal Data. Unless Adelphi offers Consumers an appropriate choice, the company uses Personal Data only for purposes that are materially the same as those indicated in this Policy.

Adelphi shares Consumer Personal Data with its affiliates and subsidiaries. Adelphi may disclose Consumer Personal Data without offering an opportunity to opt out, and may be required to disclose

the Personal Data, (i) to third-party Processors the company has retained to perform services on its behalf and pursuant to its instructions, (ii) if it is required to do so by law or legal process, or (iii) in response to lawful requests from public authorities, including to meet national security, public interest or law enforcement requirements. Adelphi also reserves the right to transfer Personal Data in the event of an audit or if the company sells or transfers all or a portion of its business or assets (including in the event of a merger, acquisition, joint venture, reorganization, dissolution or liquidation).

Accountability for Onward Transfer of Personal Data

This Policy and the [Online Privacy Notice](#) describe Adelphi's sharing of Consumer Personal Data.

Except as permitted or required by applicable law, Adelphi provides Consumers with an opportunity to opt out of sharing their Personal Data with third-party Controllers. Adelphi requires third-party Controllers to whom it discloses Consumer Personal Data to contractually agree to (i) only process the Personal Data for limited and specified purposes consistent with the consent provided by the relevant Consumer, (ii) provide the same level of protection for Personal Data as is required by the Privacy Shield Principles, and (iii) notify Adelphi and cease processing Personal Data (or take other reasonable and appropriate remedial steps) if the third-party Controller determines that it cannot meet its obligation to provide the same level of protection for Personal Data as is required by the Privacy Shield Principles.

With respect to transfers of Consumer Personal Data to third-party Processors, Adelphi (i) enters into a contract with each relevant Processor, (ii) transfers Personal Data to each such Processor only for limited and specified purposes, (iii) ascertains that the Processor is obligated to provide the Personal Data with at least the same level of privacy protection as is required by the Privacy Shield Principles, (iv) takes reasonable and appropriate steps to ensure that the Processor effectively processes the Personal Data in a manner consistent with Adelphi's obligations under the Privacy Shield Principles, (v) requires the Processor to notify Adelphi if the Processor determines that it can no longer meet its obligation to provide the same level of protection as is required by the Privacy Shield Principles, (vi) upon notice, including under (v) above, takes reasonable and appropriate steps to stop and remediate unauthorized processing of the Personal Data by the Processor, and (vii) provides a summary or representative copy of the relevant privacy provisions of the Processor contract to the Department of Commerce, upon request.

Adelphi remains liable under the Privacy Shield Principles if the company's third-party Processor onward transfer recipients process relevant Personal Data in a manner inconsistent with the Privacy Shield Principles, unless Adelphi proves that it is not responsible for the event giving rise to the damage.

Security

Adelphi takes reasonable and appropriate measures to protect Consumer Personal Data from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into account the risks involved in the processing and the nature of the Personal Data.

Data Integrity and Purpose Limitation

Adelphi limits the Consumer Personal Data it processes to that which is relevant for the purposes of the particular processing. Adelphi does not process Consumer Personal Data in ways that are incompatible with the purposes for which the information was collected or subsequently authorized by the relevant

Consumer. In addition, to the extent necessary for these purposes, Adelphi takes reasonable steps to ensure that the Personal Data the company processes is (i) reliable for its intended use, and (ii) accurate, complete and current. In this regard, Adelphi relies on its Consumers to update and correct the relevant Personal Data to the extent necessary for the purposes for which the information was collected or subsequently authorized. Consumers may contact Adelphi as indicated below to request that Adelphi update or correct relevant Personal Data.

Subject to applicable law, Adelphi retains Consumer Personal Data in a form that identifies or renders identifiable the relevant Consumer only for as long as it serves a purpose that is compatible with the purposes for which the Personal Data was collected or subsequently authorized by the Consumer.

Access

Consumers generally have the right to access their Personal Data. Accordingly, where appropriate, Adelphi provides Consumers with reasonable access to the Personal Data Adelphi maintains about them. Adelphi also provides a reasonable opportunity for those Consumers to correct, amend or delete the information where it is inaccurate or has been processed in violation of the Privacy Shield Principles, as appropriate. Adelphi may limit or deny access to Personal Data where the burden or expense of providing access would be disproportionate to the risks to the Consumer's privacy in the case in question, or where the rights of persons other than the Consumer would be violated. Consumers may request access to their Personal Data by contacting Adelphi as indicated below.

Recourse, Enforcement and Liability

Adelphi has mechanisms in place designed to help assure compliance with the Privacy Shield Principles. Adelphi conducts an annual self-assessment of its Consumer Personal Data practices to verify that the attestations and assertions Adelphi makes about its Privacy Shield privacy practices are true and that Adelphi's privacy practices have been implemented as represented and in accordance with the Privacy Shield Principles.

Consumers may file a complaint concerning Adelphi's processing of their Personal Data. Adelphi will take steps to remedy issues arising out of its alleged failure to comply with the Privacy Shield Principles. Consumers may contact Adelphi as specified below about complaints regarding Adelphi's Consumer Personal Data practices.

If a Consumer's complaint cannot be resolved through Adelphi's internal processes, Adelphi will cooperate with JAMS pursuant to the JAMS International Mediation Rules, available on the JAMS website at www.jamsadr.com/international-mediation-rules. JAMS mediation may be commenced as provided for in the relevant JAMS rules. The mediator may propose any appropriate remedy, such as deletion of the relevant Personal Data, publicity for findings of noncompliance, payment of compensation for losses incurred as a result of noncompliance, or cessation of processing of the Personal Data of the Consumer who brought the complaint. The mediator or the Consumer also may refer the matter to the U.S. Federal Trade Commission, which has Privacy Shield investigatory and enforcement powers over Adelphi. Under certain circumstances, Consumers also may be able to invoke binding arbitration to address complaints about Adelphi's compliance with the Privacy Shield Principles.

How to Contact Adelphi

To contact Adelphi with questions or concerns about this Policy or Adelphi's Consumer Personal Data practices:

Write to:

President, Adelphi Research, 2005 S. Easton Road, Suite 300, Doylestown, PA 18901, USA

Or

Chief Operating Officer, Adelphi Group, Adelphi Mill, Grimshaw Lane, Bollington, Macclesfield, SK10 5JB, UK

E-mail: privacyshield@adelphigroup.com