

Professional Security Consultants Ltd.
Safe Harbor Data Protection Policy

Policy Statement

Professional Security Consultants Limited ("PSC") acknowledges the EU's high standards for personal data protection. PSC has a need to extract and compile the human resource data of employees in the EU. This Policy addresses the privacy concerns of European employees and the business concerns of the company.

To effect this Policy, PSC will adhere to the United States Department of Commerce Safe Harbor Principles and will self-certify to the United States Department of Commerce that it is in full compliance with the Safe Harbor Principles. This Policy applies to all human resource data transmissions from PSC operations in EU countries to the United States. This statement applies to all personal information PSC handles, including on-line, off-line, and manually processed data.

The use of EU employee personnel data will include completing company auditing processes, verification/payment of employee wages, and on-site secured storage of historical human resources and payroll data.

Guidelines

PSC has adopted the seven Safe Harbor principles of notice, choice, onward transfer (transfer to third parties), access, security, data integrity and enforcement with respect to human resource data to be transferred to the U.S. from PSC operations in the EU.

1. **Notice** – PSC will notify employees in the EU about the purposes for which human resource data will be collected and used. Information will be provided on how employees can contact PSC with inquiries or complaints regarding human resource data. PSC will give notice to employees regarding third parties to which it discloses the information and restrictions that limit the information's use and disclosure.
2. **Choice** – Prior to releasing human resource data to a third party, PSC will give an individual employee the opportunity to choose whether their human resource data is disclosed to that third party or used for a purpose incompatible with the purpose for which it was originally collected or subsequently authorized by that individual. For sensitive data, an affirmative choice will be given to the employee if the human resource data is to be disclosed to a third party or used for a purpose other than its original purpose or the purposes authorized subsequently by the individual.
3. **Onward transfer** – (transfer to third parties) – Prior to disclosing human resource data to a third party, PSC will apply the notice and choice principles, enumerated above. PSC will commit to ensuring that the third party keeper of human resource data also subscribes to the Safe Harbor Principles. PSC will also enter into a written agreement with such third party requiring that the third party provide at least the same level of personal data protection as is maintained by PSC.
4. **Access** – Employees covered under this policy will have access to personnel information about them that PSC holds and will be able to correct, amend or delete information if it is inaccurate (the exception is when the burden or expense of providing access would be disproportionate to the risks of the individual privacy in the case in question or the rights of persons other than the individual would be violated.)
5. **Security** – PSC will take reasonable precautions to protect personal information from loss, misuse and unauthorized access, disclosure, alteration and destruction.

6. **Data Integrity** – Human resource data kept by PSC will be relevant for the purposes for which it is to be used. PSC will take reasonable steps to ensure that the data is reliable and that it is applied to its intended use. PSC will also ensure that the information is accurate, complete and correct.
7. **Enforcement** – To ensure compliance with these Safe Harbor Principles, PSC will:
 - a. Commit to cooperate with the Data Protection Authorities (DPAs) of the EU countries in the investigation and resolution of complaints and will comply with any advice given by DPAs;
 - b. Employ a procedure for verifying that the commitment the company has made to adhere to the Safe Harbor Principles has been implemented;
 - c. Remedy issues arising out of any failure to comply with the Principles. PSC acknowledges that its failure to provide an annual self-certification to the Department of Commerce will remove it from its list of participants and the transfers of information will not be allowed unless PSC otherwise complies with the EU Data Protection Directive.

The PSC Vice President of International Operations will be responsible for the internal mechanism for ensuring compliance with the Safe Harbor Principles and facilitating the independent recourse mechanism referenced in item 7 above of this Policy.

Access to the human resource data of EU employees will be to a limited number of users on a need to know basis.

Responsibilities

Questions regarding the transmission of human resource data from the European Union (EU) to the United States or any other non-EU location, or any further transmission of the personnel data once received in the United States, should be referred to the PSC Vice President of International Operations. That individual is responsible for maintaining this document.

PSC must annually, in writing, certify to the Department of Commerce that it agrees to adhere to the Safe Harbor Principles.

Any user who feels that his or her personal information has been misused should direct any questions or complaints to SHAULMPSC@yahoo.co.uk or SHAULPSC@aol.com. PSC will then take reasonable steps to investigate such questions or complaints. If an employee feels that PSC has not appropriately handled the complaint or question, they may then send a written description of their complaint to the PSC Legal Department, who will contact the user to try and resolve his or her concerns. PSC will cooperate with the European Union Data Protection Authorities in the applicable European Union Member States and data protection authorities under any applicable privacy laws to resolve the issues.

Notification of Change

If PSC decides to change its privacy policy, those changes will be posted on the PSC web site. If you have questions about the PSC privacy policy, please contact us at:

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