



Privacy Policy in Accordance with the EU-US Privacy Shield Framework

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Privacy Policy Statement:

- 1. Notice:** In an increasingly online and interconnected world where new cyber-threats materialize on a daily basis, safeguarding personal information is absolutely imperative. Out of respect for the privacy of our customers and in accordance with the law of the European Union, Q-DAS Incorporated complies with the EU-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries. Q-DAS Incorporated has certified that it adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability. If there is any conflict between the policies in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>.

When handling any personal information or data received from the European Union, Q-DAS Incorporated is committed to following the EU-US Privacy Shield Framework principles published by the U.S. Department of Commerce. We collect names, business addresses, e-mail addresses, and phone numbers solely to facilitate communication in the normal course of conducting business. These contact details are used to create and send proposals, schedule training classes and on-site services, and process customer orders and payments. Only employees of Q-DAS Incorporated will have access to any such personal information; it is never forwarded to a third party except when the customer has contracted the services of a third party vendor through Q-DAS by means of a purchase order. The contact information will only be used to facilitate communication between the customer and the vendor. In these cases, Q-DAS accepts liability for ensuring the vendor complies with the principles of the Privacy Shield. Q-DAS Incorporated does not collect any sensitive personal information (such as financial information or government-issued identification numbers) from individuals in the European Union, nor do we receive any human resources data from the European Union or send human resources data from the United States to the European Union. Corporate financial information is received or retained exclusively for the purpose of remitting payment for goods received or services rendered.

Any citizen of the European Union who sends personal information to Q-DAS Incorporated has the right to access, correct, or delete said data and may request in writing that its use be limited at the time of its provision. Personal information will never be disclosed to a third party except as detailed in the previous paragraph and only with the consent of the data's provider. Should any complaints arise about this privacy policy or our use of personal information, they may be submitted via the contact information listed under



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subsection 7. Q-DAS will address these complaints in a timely manner, but should the individual filing the complaint feel their issue is not being handled in a satisfactory manner, they may contact our contracted alternative dispute provider (BBB EU PRIVACY SHIELD) for recourse via the contact information under subsection 7. This arbitration is free of charge to the person filing the complaint. Q-DAS Incorporated is also subject to investigation by the Federal Trade Commission (FTC) into any claims against the organization regarding possible unfair or deceptive practices and violations of laws or regulations governing our privacy practices.

If required by law, Q-DAS Incorporated may be forced to turn over personal information to public authorities for reasons such as matters of national security or assisting law enforcement.

2. **Choice:** No personal information collected by Q-DAS Incorporated will be shared with a third party or used for any purposes aside from those consented to by the provider of the information.
3. **Accountability for Onward Transfer:** In the event Q-DAS Incorporated must transfer any personal information to a third party controller, permission will first be obtained from the provider of the information. In such cases, Q-DAS accepts responsibility for ensuring with the third party both adherence to the Privacy Shield principles and restricts the use of the information to purposes approved by the information's provider. Q-DAS Incorporated may be liable for the transfer of personal data to third parties unless we can prove we were not a party to the events giving rise to the damages.
4. **Security:** Q-DAS Incorporated has taken suitable preventative measures to protect all personal information from loss, misuse and unauthorized access, disclosure, alteration or destruction.
5. **Data Integrity and Purpose Limitation:** Q-DAS Incorporated will only collect personal information necessary for processing purposes. Personal information will not be used in any manner contrary to the provider's wishes or incompatible with the reason it was collected. To the best of our ability, we strive to keep the information we retain up to date, free of errors, and complete. All personal information will only be retained as long as it is necessary for processing.
6. **Access:** Upon request, Q-DAS Incorporated will grant individuals the opportunity to access their Personal Information and provide means for the correction, amending, or deletion of any inaccurate information, except where the burden or expense of providing access

would be disproportionate to the risk the individual's privacy in case in question or where the rights of persons other than the individual would be violated.

7. **Recourse, Enforcement, and Liability:** In compliance with the EU-US Privacy Shield Principles, Q-DAS Incorporated commits to resolve complaints about your privacy and our collection or use of your personal information. European Union individuals with inquiries or complaints regarding this privacy policy should first contact Q-DAS Incorporated at:

Q-DAS Incorporated
2582 Product Drive
Rochester Hills, MI 48309
Phone: +1 (248) 299-4910
Fax: +1 (248) 299-4913
E-mail: q-das@q-das.com

Q-DAS Incorporated has further committed to refer unresolved privacy complaints under the EU-US Privacy Shield Principles to the BBB EU PRIVACY SHIELD, a non-profit alternative dispute resolution provider located in the United States and operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit www.bbb.org/EU-privacy-shield/for-eu-consumers/ for more information and to file a complaint.

If all previously mentioned recourse mechanisms do not resolve the situation to the satisfaction of the concerned party, "last resort" binding arbitration is available through the EU Privacy Shield Panel per the guidelines set forth in Annex 2 of the EU-US Privacy Shield Framework (http://ec.europa.eu/justice/data-protection/files/annexes_eu-us_privacy_shield_en.pdf).

Q-DAS Incorporated will periodically use a self-assessment approach to ensure compliance with this privacy policy and to confirm all employees are adequately educated about and adhering to the policy. In the event of onward data transfer, Q-DAS may be liable and we accept responsibility for ensuring the data's recipients comply with the EU-US Privacy Shield Principles.

The United States Federal Trade Commission (FTC) is the enforcement authority with jurisdiction over this compliance with the Privacy Shield.

Effective Date of Implementation

August 25, 2016