



Safe Harbor Statement

PRO Unlimited, Inc. makes all reasonable efforts to protect the personal data of our employees, contractors, suppliers, clients and other third parties. Our privacy program is controlled by specific policies, as well as process procedures and controls. For personal data associated with individuals or firms located in the European Economic Area (EEA), PRO has agreed to fulfill the requirements of 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. PRO Unlimited, Inc. has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement.

PRO gathers, processes and stores personal data for the following purposes:

- To collect, store, merge, maintain and process supplier, employee, contractor and customer data, as required by the services performed by PRO
- In developing and administrating compensation, benefits and other human resource programs and employer / employee related obligation
- In monitoring, evaluating and storing information, regarding the conduct and performance of employees, contractors and suppliers
- In order to fulfill legal requirements and obligations
- To be able to meet auditing requirements associated with regulatory, accounting and financial purposes

PRO Unlimited takes privacy concerns seriously. Anyone having questions, complaints or concerns about PRO's handling of personal data may contact PRO at privacy@prounlimited.com.

Safe Harbor Overview

The European Commission's Directive on Data Protection went into effect in October 1998, and prohibits the transfer of personal data to non-European Union nations that do not meet the European "adequacy" standard for privacy protection. While the United States and the European Union share the goal of enhancing privacy protection for their citizens, the United States takes a different approach to privacy from that taken by the European Union. The United States uses a sectoral approach that relies on a mix of legislation, regulation, and self regulation. The European Union, however, relies on comprehensive legislation that, for example, requires creation of government data protection agencies, registration of data bases with those agencies, and in some instances prior approval before personal data processing may begin. As a result of these different privacy approaches, the Directive could have significantly hampered the ability of U.S. companies to engage in many trans-Atlantic transactions.

In order to bridge these different privacy approaches and provide a streamlined means for U.S. organizations to comply with the Directive, the U.S. Department of Commerce in consultation with the European Commission developed a "Safe Harbor" framework. The Safe Harbor — approved by the EU in July of 2000 — is an important way for U.S. companies to avoid experiencing interruptions in their business dealings with the EU or facing prosecution by

European authorities under European privacy laws. Certifying to the Safe Harbor will assure that EU organizations know that your company provides "adequate" privacy protection, as defined by the Directive. Similarly, the U.S. Department of Commerce in consultation with the Federal Data Protection and Information Commissioner of Switzerland developed a "Safe Harbor" framework to bridge the differences between the two countries' privacy approaches and provide a streamlined means for U.S. organizations to comply with the Swiss data protection law.

As of June 1, 2009, the European Economic Area (EEA) members include:

- Austria
- Belgium
- Bulgaria
- Cyprus (Greek part)
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Iceland
- Ireland
- Italy
- Latvia
- Lichtenstein
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Norway
- Poland
- Portugal
- Romania
- Slovakia
- Slovenia
- Spain
- Sweden
- Switzerland*
- United Kingdom

For more information, on the Safe Harbor program and to view PRO Unlimited, Inc.'s certification, go to <http://www.export.gov/safeharbor> .