

Safe Harbor Policy

CliCKS Document Management holds individual privacy rights and protection of data in the highest regard. Because of such we have implemented internal procedures to assure our privacy and security practices comply with US & International Law. The following Safe Harbor Privacy Policy describes the principles that CliCKS Document Management will follow in receiving documents, either in electronic form or hard-copy form, from our law firm clients and corporate clients that may contain personal data from the European Union (“EU”) and/or the European Economic Area (“EEA”) and Switzerland to the United States (“US”) for Electronic Data Discovery processing, Web hosting and related services.

CliCKS Document Management 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. CliCKS Document Management has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program and to view CliCKS Document Management certification, please visit <http://www.export.gov/safeharbor/>

Safe Harbor Definitions

Directive—the EU Directive 95/46/EC on the protection of individuals with regard to the processing of personal data and on the free movement of such data.

Safe Harbor Privacy Principles—These are the principles developed by the EU and the United States Department of Commerce that provide the necessary level of protection required by the EU Directive in respect of transfers of personal information to countries outside the EEA.

Personal Data—Any information relating to an identified or identifiable natural person (‘data subject’); and identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity.

Data Processor--- a person who processes personal data on behalf of someone else.

Notice

CliCKS Document Management does not collect personal data or control the collection of personal data from individuals but instead acts as a data processor for our law firm clients and corporate clients. When acting as a data processor within the means of the Data Directive, we reserve the right to process all presented information, which may or may not contain personal information, on behalf of and under the direction of our law firms and corporate clients without providing notice to individuals or Data Protection Authorities to the extent permitted by the Safe Harbor Agreement.

Choice

CliCKS Document Management does not share personal information with third parties, unless required by law or lawfully directed by the client law firm or originating organization to do so, and as such there is no need to offer individuals the opportunity to opt out from having data disclosed.

Onward Transfer

If CliCKS Document Management is directed or required to transfer personal data to another third party acting as agent of its client or otherwise, it will do so if it first either ascertains that the third party subscribes to the Safe Harbor Principles or is subject to the European Commission’s Directive on Data Protection or another adequacy finding or enters into a written agreement with such third party requiring

that the third party provide at least the same level of privacy protection as is required by the relevant Principles.

Security

CliCKS Document Management is committed to the protection of individual's private information and takes reasonable precautions to protect personal information from loss, misuse, unauthorized access, disclosure, alteration and destruction. Our security measures include physical, electronic, workflow and managerial procedures to safeguard and secure the information we process.

Data Integrity

CliCKS Document Management processes personal information on behalf of and under the direction of our law firms and corporate clients. The personal data will be processed in ways that are compatible with the purpose for which it was collected.

Access

Since CliCKS Document Management acts as data processor and not collector (originator) of the data being processed, individuals cannot be routinely provided access to personal information about them in order to correct, amend or delete the information when inaccurate. The individual would have to contact the originating collector of the data to change such information.

Enforcement and Dispute Resolution

CliCKS Document Management utilizes the self-assessment approach to assure its compliance with our privacy statement. Any questions or concerns about this privacy policy, or any who believe we are in violation, should first contact:

Jeannie Collins
CliCKS Document Management
320 Ft. Duquesne Blvd., Ste 350
Pittsburgh, PA 15222
412-391-1218
jcollins@clicksdocs.com

We will work with you to address your issues. With respect to any complaints relating to this policy that cannot be resolved through our internal processes, we have agreed to mediate the issue through JAMS. In the event that we or such authorities determine that we did not comply with this policy, we will take appropriate steps to address any adverse effects and to promote future compliance. Should we determine that any employee of CliCKS Document Management has failed to adhere to the terms of this Policy, such employee may be subject to disciplinary action up to and including termination.