

Personal Data Protection Policy

Acument Global Technologies, Inc. and its subsidiaries and affiliates, respect the privacy of their employees and are committed to protecting employee data maintained by the company. For this reason, Acument Global Technologies, Inc. and its affiliated U.S. entities (Acument) have adopted this Safe Harbor Data Privacy Policy in compliance with the Safe Harbor Principles published by the U.S. Department of Commerce with respect to personal data transferred from the European Union to the United States of America.

Policy Statement

It is Acument policy that employees must process personal data fairly and lawfully. Acument operations are responsible for collecting personal data only for specific, lawful, explicit and legitimate purposes, and for further processing of personal data consistent with those purposes. It is Acument's policy that personal data be adequate, relevant and not excessive to the purpose for which they are collected or further processed. Acument operations are responsible for making every reasonable effort to maintain such data accurately, provide reasonable means to correct, delete, or rectify any inaccurate data, and store such data for periods no longer than is necessary. If an Acument operation or facility falls within the jurisdiction of more than one governmental body, it is responsible for complying with the higher or highest data protection standard in effect should there be any variance in those standards.

Confidentiality & Security

Acument operations are responsible for taking prudent steps to safeguard the confidentiality and security of all personal data, including appropriate procedural, organizational and technical steps to protect personal data from accidental or unlawful destruction or accidental loss, alteration or disclosure. These steps include entering into written agreements with subcontractors who process personal data in accordance with Acument's instructions incorporating Acument's own data protection standards as a minimum.

Notification to Government Agencies

Acument operations will comply with required governmental agency notification requirements.

Data Subject Access, Corrections & Deletions

Acument recognizes the right of data subjects to obtain without constraint at reasonable intervals and without excessive delay or expense:

1. Confirmation concerning whether Acument, any representative or agent is holding or processing personal data relating to him or her;
2. Information on the purpose(s) of the processing, the categories of data concerned, and the recipients or categories of recipients;
3. Information in an intelligible form concerning the data relating to him or her being processed and the source of such data; and
4. Information, as appropriate, concerning the logic underlying the data processing.

Further, Acument recognizes the data subject's right to require, as appropriate, the rectification, erasure or blocking of data whenever the processing of such data does not comply with applicable laws and regulations. Acument operations will alert, to the extent practicable, third parties to whom the data have been disclosed of any such rectification, erasure or blocking.

Data Collection, Transfer & Processing

Acument operations are responsible for collecting, processing and transferring personal data in compliance with the law. Only in very limited and rare circumstances, will Acument operations pass on personal data to healthcare professionals, e.g. where the data subject's health and well-being would otherwise be adversely affected and the data subject is unable to give formal consent.

It is Acument's policy that except as allowed or required by law, personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union memberships, health or sex life or alleged commission of any offense not be processed and the collection and storage of such 'sensitive' personal data be particularly safeguarded.

For personal data obtained directly from the data subject, Acument operations are responsible for informing the data subject of the identity of those controlling the data, the purpose for which the data is being collected and processed and any further information the data subject may need for fair processing. This same standard applies to personal data not obtained directly from the data subject, except as allowed by law for statistical purposes.

Acument operations are responsible for informing the data subject prior to any initial transfer or processing of personal data for direct marketing purposes and, upon request, for blocking such action.

It is Acument policy not to transfer personal data to any entity, individual, or organization, particularly entities within third countries without adequate data protections, which does not meet the standards established by this policy without ensuring that:

1. The data subject has given his/her unambiguous consent;
2. The transfers are needed for the performance of a contract between the data subject and the controller or to implement a pre-contractual commitment made at the request of the data subject;
3. The transfers are needed for the conclusion or performance of a contract concluded in the interest of the data subject between the controller and a third party;
4. The transfers are needed to protect the vital interests of the data subject; or
5. The transfers are made from a register established pursuant to laws and regulations as being open for consultation by members of the general public or by any person who can demonstrate a legitimate interest.

Definitions

Consent – the freely given and informed agreement by a person (i.e., the "data subject") to the processing of his/her personal data. The data subject may withdraw his/her consent at any time and may attach any condition or limitation he/she believes to be appropriate.

Personal Data – any information relating to an identified or identifiable natural person (i.e., a private individual as opposed to a corporation or other comparable entity). An identifiable person is someone who can be identified, directly or indirectly, in particular by reference to an identification number or the person's physical, physiological, mental, economic, cultural or social characteristics. Personal data may relate to employees or other natural persons, including customers, clients, investors, suppliers, contractors or other individuals.

Data Subject – a natural person, a private individual about whom information is collected, stored or processed.

Scope

This policy applies to all Acument operations and business units. To the extent any Acument operation or business unit already has a data protection policy in place; this policy shall supersede any inconsistencies and/or supplement any such policies.

Responsibility

The Executive Vice President & General Counsel is responsible for the administration of this policy and monitoring enterprise wide compliance. A Reference Guide containing more detailed guidance is available from the Executive Vice President & General Counsel.

Effective Date

| This policy is effective August 12, 2006.