
NorthgateArinso, Inc. US-EU & US-Swiss SAFE HARBOR PRIVACY POLICY

NorthgateArinso, Inc. 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. NorthgateArinso, Inc. 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 NorthgateArinso's certification, please visit <http://www.export.gov/safeharbor/>

SAFE HARBOR

The United States Department of Commerce and the European Commission have agreed on a set of data protection principles and frequently asked questions to enable U.S. companies to satisfy the requirement under European Union law that adequate protection be given to personal information transferred from the EEA to the United States (the "U.S.-EU Safe Harbor"). The EEA also has recognized the U.S.-EU Safe Harbor as providing adequate data protection (OJ L 45, 15.2.2001, p.47). The United States Department of Commerce and the Federal Data Protection and Information Commissioner (FDPIC) of Switzerland have agreed on a similar set of principles and frequently asked questions to enable U.S. companies to satisfy the requirement under Swiss law that adequate protection be given to personal information transferred from Switzerland to the United States (the "U.S.-Swiss Safe Harbor"). Consistent with its commitment to protect personal privacy, NorthgateArinso adheres to the principles set forth in the U.S.-EU Safe Harbor and the U.S.-Swiss Safe Harbor (the "Safe Harbor Principles").

SCOPE

This Safe Harbor Privacy Policy (the "Policy") applies to all personal information received by NorthgateArinso in the United States from the EEA and from Switzerland, in any format, including electronic, paper or verbal.

DEFINITIONS

For purposes of this Policy, the following definitions shall apply:

“Agent” means any third party that collects or uses personal information under the instructions of, and solely for, NorthgateArinso or to which NorthgateArinso discloses personal information for use on NorthgateArinso's behalf.

“NorthgateArinso” means NorthgateArinso Inc., a Georgia Corporation, and its groups and divisions in the United States.

“Personal information” means any information or set of information that identifies or could be used by or on behalf of NorthgateArinso to identify an individual. Personal information does not include information that is encoded or anonymized, or publicly available information that has not been combined with non-public personal information.

“Sensitive personal information” means personal information that reveals race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, views or activities, that concerns health or sex life, information about social security benefits, or information on criminal or administrative proceedings and sanctions other than in the context of pending proceedings. In addition, NorthgateArinso will treat as sensitive personal information any information received from a third party where that third party treats and identifies the information as sensitive.

PRIVACY PRINCIPLES

The privacy principles in this Policy have been developed based on the Safe Harbor Principles.

NOTICE: Where NorthgateArinso collects personal information directly from individuals in the EEA, it will inform them about the purposes for which it collects and uses personal information about them, the types of non-agent third parties to which NorthgateArinso discloses that information, the choices and means, if any,

NorthgateArinso offers individuals for limiting the use and disclosure of personal information about them, and how to contact NorthgateArinso. Notice will be provided in clear and conspicuous language when individuals are first asked to provide personal information to NorthgateArinso, or as soon as practicable thereafter, and in any event before NorthgateArinso uses or discloses the information for a purpose other than that for which it was originally collected.

Where NorthgateArinso receives personal information from its subsidiaries, affiliates or other entities in the EEA, it will use and disclose such information in accordance with the notices provided by such entities and the choices made by the individuals to whom such personal information relates.

CHOICE: NorthgateArinso will offer individuals the opportunity to choose (opt-out) whether their personal information is (a) to be disclosed to a non-agent third party, or (b) to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual.

For sensitive personal information, NorthgateArinso will give individuals the opportunity to affirmatively and explicitly (opt-in) consent to the disclosure of the information to a non-agent third party or the use of the information for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual.

NorthgateArinso will provide individuals with reasonable mechanisms to exercise their choices.

DATA INTEGRITY: NorthgateArinso will use personal information only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual. NorthgateArinso will take reasonable steps to ensure that personal information is relevant to its intended use, accurate, complete, and current.

TRANSFERS TO AGENTS: NorthgateArinso will obtain assurances from its agents that they will safeguard personal information consistently with this Policy. Examples of appropriate assurances that may be provided by agents include: a contract obligating the agent to provide at least the same level of protection as is required by the relevant Safe Harbor Principles, being subject to EU Directive 95/46/EC (the EU Data Protection Directive), being subject to Swiss Federal Act on Data Protection, Safe Harbor certification by the agent, or being subject to another European Commission or Swiss FDPIC adequacy finding (e.g., companies

located in Canada). Where NorthgateArinso has knowledge that an agent is using or disclosing personal information in a manner contrary to this Policy, NorthgateArinso will take reasonable steps to prevent or stop the use or disclosure.

ACCESS AND CORRECTION: Upon request, NorthgateArinso will grant individuals reasonable access to personal information that it holds about them. In addition, NorthgateArinso will take reasonable steps to permit individuals to correct, amend, or delete information that is demonstrated to be inaccurate or incomplete.

SECURITY: NorthgateArinso will take reasonable precautions to protect personal information in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction.

ENFORCEMENT: NorthgateArinso will conduct compliance audits of its relevant privacy practices to verify adherence to this Policy. Any employee that NorthgateArinso determines is in violation of this policy will be subject to disciplinary action up to and including termination of employment.

DISPUTE RESOLUTION: Any questions or concerns regarding the use or disclosure of personal information should be directed to the NorthgateArinso Privacy Office at the address given below. NorthgateArinso will investigate and attempt to resolve complaints and disputes regarding use and disclosure of personal information by reference to the principles contained in this Policy. For complaints that cannot be resolved between NorthgateArinso and the complainant, NorthgateArinso has agreed to participate in the dispute resolution procedures of the panel established by the EU data protection authorities (DPAs) to resolve, pursuant to the Safe Harbor Privacy Principles, disputes arising from collection, use, and retention of personal information transferred from EU member countries to companies in the United States. NorthgateArinso has also agreed to cooperate and comply with the Federal Data Protection and Information Commissioner (FDPIC) of Switzerland to resolve, pursuant to the Safe Harbor Privacy Principles, disputes arising from collection, use, and retention of personal information transferred from Switzerland to companies in the United States. EU residents who do not receive timely acknowledgment of their complaint, or whose complaint is not addressed by NorthgateArinso to their satisfaction may contact either the EU DPAs' panel at ec-dppanel-secr@ec.europa.eu or individual EU DPAs (see http://ec.europa.eu/justice/data-protection/bodies/authorities/eu/index_en.htm). The contact information for the Swiss FDPIC can be found at: <http://www.edoeb.admin.ch/kontakt/index.html?lang=en>.

LIMITATION ON APPLICATION OF PRINCIPLES

Adherence by NorthgateArinso to these Safe Harbor Principles may be limited (a) to the extent required to respond to a legal or ethical obligation; (b) to the extent necessary to meet national security, public interest or law enforcement obligations; and (c) to the extent expressly permitted by an applicable law, rule or regulation.

INTERNET PRIVACY

NorthgateArinso sees the Internet and the use of other technology as valuable tools to communicate and interact with consumers, employees, healthcare professionals, business partners, and others. NorthgateArinso recognizes the importance of maintaining the privacy of information collected online and has created a specific Internet Privacy Policy (the "IPP") governing the treatment of personal information collected through web sites that it operates. With respect to personal information that is transferred from the European Economic Area or Switzerland to the U.S., the IPP is subordinate to this Policy. However, the IPP also reflects additional legal requirements and evolving standards with respect to Internet privacy. NorthgateArinso's Internet Privacy Policy can be found at <http://www.ngahr.com/privacy-policies>

CONTACT INFORMATION

Questions or comments regarding this Policy should be submitted to the NorthgateArinso Privacy Office by mail to:

NorthgateArinso Privacy Office
Attn: Legal Department
8000 Baymeadows Way
Jacksonville, FL 32256

EFFECTIVE DATE: Oct 1, 2015