



Safe Harbor Privacy Policy

Introduction

Futron is a provider of leading-edge Decision Management Solutions to organizations throughout the aerospace and telecommunications industries. Protecting customer and employee privacy is important to us. Futron adheres to the Safe Harbor Framework concerning the transfer of personal data from the European Union (“EU”) to the United States of America. Accordingly, we follow the Safe Harbor Principles published by the U.S. Department of Commerce (the “Principles”) with respect to all such data. If there is any conflict between the policies in this privacy policy and the Principles, the Principles shall govern. This privacy policy outlines our general policy and practices for implementing the Principles, including how we use it and the notice and choice affected individuals have regarding our use of and their ability to correct that information. This privacy policy applies to all personal information received by Futron from the EU whether in electronic, paper or verbal format.

Definitions

“Personal Information” or “Information” means information that (1) is transferred from the EU to the United States; (2) is recorded in any form; (3) is about, or pertains to a specific individual; and (4) can be linked to that individual.

“Sensitive Personal Information” means personal information that reveals race, ethnic origin, sexual orientation, political opinions, religious or philosophical beliefs, trade union membership or that concerns an individual’s health.

Principles

Notice

Futron shall inform an individual of the purpose for which it collects and uses the Personal Information and the types of non-agent third parties to which Futron discloses or may disclose that Information. Futron shall provide the individual with the choice and means for limiting the use and disclosure of their Personal Information. Notice will be provided in clear and conspicuous language when individuals are first asked to provide Personal Information to us, or as soon as practicable thereafter, and in any event before Futron uses or discloses the Information for a purpose other than it was originally intended.

Choice

Futron will offer individuals the opportunity to choose (opt out) whether their Personal Information is (1) to be disclosed to a third party or (2) to be used for a purpose other than the purpose for which it was originally intended or subsequently authorized by the individual. For Sensitive Personal Information, Futron will give individuals the opportunity to affirmatively or explicitly (opt out) consent to the disclosure of the information for a purpose other than the purpose for which it was originally intended or subsequently authorized by the individual.

Onward Transfers

Prior to disclosing Personal Information to a third party acting as an agent, Futron shall notify the individual of such disclosure and allow the individual the choice (opt out) of such disclosure. Futron shall ensure that any third party to which Personal Information may be disclosed subscribes to the Principles or are subject to the Principles or to laws that are at the same level of privacy protection as is required by the Principles and agree in writing to provide an adequate level of privacy protection.

Data Security

Futron shall take reasonable precautions to protect the Information from loss, misuse and unauthorized access, disclosure, alteration and destruction. Futron has put in place appropriate physical, electronic and managerial procedures to safeguard and secure the Information from loss, misuse, unauthorized access, disclosure, alteration or destruction. Futron cannot guarantee the security of Information on or transmitted via the Internet.



Data Integrity

Futron shall only process Personal Information in a way that is relevant for the purpose for which it was collected or authorized by the individual. To the extent necessary, Futron shall take reasonable steps to ensure that Personal Information is accurate, complete and current.

Access

Futron shall allow an individual access to their Personal Information and allow the individual to correct, amend or delete inaccurate information, except where the burden or expense of providing access would be disproportionate to the risks to the privacy of the individual in the case in question or where the rights of persons other than the individual would be violated.

Enforcement

Futron uses a self-assessment approach to assure compliance with this privacy policy and periodically verifies that the policy is accurate, compliant, comprehensive, prominently displayed, completely implemented and accessible. We encourage interested persons to raise any concerns using the contact information provided below and we will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of Personal Information in accordance with the Principles.

Futron Corporation has further committed to refer unresolved privacy complaints under the Safe Harbor Principles to an independent dispute resolution mechanism, the BBB EU Safe Harbor, 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 by Futron, you may contact:

Council of Better Business Bureaus, Inc.
BBB EU Safe Harbor
4200 Wilson Boulevard, Suite 800
Arlington, VA 22203
Phone: 703-276-0100
Web: www.us.bbb.org
Email: eusafeharbor@council.bbb.org

Amendments

This privacy policy may be amended from time to time consistent with the requirements of the Safe Harbor. We will post any revised policy on this website.

Contact Office: Human Resources
Contact Name: Eileen Hannigan
Contact Phone: 301-347-3418
Contact Fax: 301-913-9475
Contact Email: ehannigan@futron.com