



## EU Privacy Policy Statement

Robbins-Gioia Inc. (“Robbins-Gioia”) strives to collect, use and disclose Personally Identifiable Information (defined below) in a manner consistent with the laws of the countries in which it does business and has a tradition of upholding the highest ethical standards in its business practices. Robbins-Gioia abides by the Safe Harbor Principles developed by the U.S. Department of Commerce and the European Commission and the Frequently Asked Questions (FAQs) issued by the Department of Commerce on July 21, 2000.

This Safe Harbor Privacy Policy (the “Policy”) sets forth the privacy principles that Robbins-Gioia follows with respect to transfers of Personally Identifiable Information anywhere in the world, including transfers from the European Economic Area (EEA) to the United States. “Personally Identifiable Information” shall mean any information relating to an identified or identifiable natural person; an 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.

The following privacy principles apply solely to the extent that Robbins-Gioia collects Personally Identifiable Information directly from individuals.

### **Notice**

Robbins-Gioia will inform individuals about the purposes for which it collects and uses Personally Identifiable Information about them, the types of non-agent third parties to which Robbins-Gioia discloses that information, and the choices and means, if any, Robbins-Gioia offers individuals for limiting the use and disclosure of their Personally Identifiable Information. Notice will be provided in clear and conspicuous language when individuals are first asked to provide Personally Identifiable Information to Robbins-Gioia, or as soon as practicable thereafter, and in any event before Robbins-Gioia uses the information for a purpose other than that for which it was originally collected.

### **Choice**

Robbins-Gioia will offer individuals the opportunity to choose (opt out of) whether their Personally Identifiable Information is (a) to be disclosed to a non-agent third party, or (b) to be

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11 Canal Center Plaza, Alexandria, VA 22314    T 800.663.7138    F 703.684.5189

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used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual. For sensitive Personally Identifiable Information, Robbins-Gioia 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.

Robbins-Gioia will provide individuals with reasonable mechanisms to exercise their choices should requisite circumstances arise.

In order to request that Robbins-Gioia not use an individual's non-public Personally Identifiable Information, such individual should contact the firm by sending Robbins-Gioia an e-mail message at [safeharbor@robbinsgioia.com](mailto:safeharbor@robbinsgioia.com) to request access to, correct or delete any Personally Identifiable Information that you have provided to us.

Individuals may also opt out of receiving marketing messages from Robbins-Gioia by notifying Robbins-Gioia at [marketing@robbinsgioia.com](mailto:marketing@robbinsgioia.com).

Prior to making any alterations in its information, Robbins-Gioia will require that individuals confirm their identity.

### **Data Integrity**

Robbins-Gioia will use Personally Identifiable Information only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual. Robbins-Gioia will take reasonable steps to ensure that Personally Identifiable Information is relevant to its intended use, accurate, complete, and current.

### **Onward Transfer**

Robbins-Gioia will comply with the notice and choice principles as described above for all data which is disclosed or transferred to a third party.

Robbins-Gioia will obtain assurances from its agents that they will safeguard Personally Identifiable Information consistently with this Policy. Robbins-Gioia will require that its agents either: (i) subscribe to the EU Safe Harbor Principles, the EU Data Protection Directive or another adequacy finding; or (ii) enter into a written agreement with Robbins-Gioia requiring them to provide the same level of protection as Robbins-Gioia.

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## **Security**

Robbins-Gioia will take reasonable precautions to protect Personally Identifiable Information in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction. Robbins-Gioia limits access to Personally Identifiable Information and data to those persons in the Robbins-Gioia organization, or agents of Robbins-Gioia, that have a specific business purpose for maintaining and processing such information and data. Individuals who have been granted access to Personally Identifiable Information are aware of their responsibilities to protect the security, confidentiality and integrity of that information.

## **Access**

Upon request, Robbins-Gioia will grant individuals reasonable access to Personally Identifiable Information that it holds about them. In addition, Robbins-Gioia will take reasonable steps to permit individuals to correct, amend, or delete information that is demonstrated to be inaccurate or incomplete. Robbins-Gioia agrees to process all reasonable requests for access within a reasonable time period, but reserves the right to deny access or limit access in cases where the burden or cost of providing access would be disproportionate to the risks to the individual's privacy or in the case of a vexatious or fraudulent request. Any employee of Robbins-Gioia that desires to review or update their Personally Identifiable Information can do so by contacting their human resources representative.

## **Enforcement**

Individuals who wish to file a complaint or who take issue with this Policy should direct such communication to Robbins-Gioia via e-mail to [safeharbor@robbinsgioia.com](mailto:safeharbor@robbinsgioia.com). Robbins-Gioia will explain the process to be followed when filing a complaint. Filing a complaint in English will expedite the process. Robbins-Gioia will investigate and attempt to resolve complaints and disputes regarding use and disclosure of Personally Identifiable Information in accordance with the principles contained in this Policy. For complaints that cannot be resolved between Robbins-Gioia and the complainant, complaints will be submitted to the American Arbitration Association ("AAA") for mediation and then if necessary, to binding arbitration for final resolution. Information about AAA services can be found at its website: [www.adr.org](http://www.adr.org).

Robbins-Gioia is also subject to the jurisdiction of the US Federal Trade Commission. The Federal Trade Commission may be contacted at the following address:

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Federal Trade Commission  
Attn: Consumer Response Center  
600 Pennsylvania Avenue NW  
Washington, DC 20580  
Email: [consumerline@ftc.gov](mailto:consumerline@ftc.gov)  
[www.ftc.gov](http://www.ftc.gov)

**Comments**

If you have any questions, comments or concerns about our privacy practices, please contact us by e-mail at [safeharbor@robbinsgioia.com](mailto:safeharbor@robbinsgioia.com) or telephone the corporate marketing group at 1 703 548-7006.

Effective as of December 3, 2008

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