

CUSTOMER ASSET CONSULTING GROUP, INC. EU SAFE HARBOR PRIVACY POLICY

Customer Asset Consulting Group, Inc. (“CAC Group”) conducts its data transfer from the European Union (EU) to the United States (US) according to the EU Safe Harbor Principles and the frequently asked questions (FAQs) issued by the US Department of Commerce on July 21, 2000. CAC Group adheres to the Safe Harbor Privacy Principles and the 15 FAQs that make up the Safe Harbor Framework.

Processor On Behalf

CAC Group Inc. acts as a processor on behalf of its clients, providing customized services that enable organizations to manage their customer information efficiently in such ways as reducing data-processing timeframes, increasing marketing efficiency, and applying database marketing strategies. CAC Group processes marketing information of its clients and on behalf of its clients. In this capacity as a processor on behalf, CAC Group acts on the instructions of its clients and does not control or share such data without direction from the client.

For such data processing, CAC Group enters into agreements with its clients in the EU specifying that the EU client recognizes that it is a data controller for the purpose of the EU Data Directive and is in compliance with the corresponding Member State national data protection laws.

Data Security

CAC Group will not disclose to third parties personal data processed in this capacity, except as permitted or required by the processing agreement, EU Safe Harbor, applicable Member State data protection law or as otherwise required by law.

CAC Group has security measures in place to help protect personal data from loss, misuse, unauthorized access, disclosure, alteration, and destruction.

Inquiries

CAC Group has a designated individual who is responsible for the internal supervision of CAC Group’s privacy policies. CAC Group educates relevant employees about compliance with the Safe Harbor Principles and has self-assessment procedures in place to ensure its compliance. The U.S. Direct Marketing Association (DMA) serves as CAC Group’s third-party dispute resolution provider, as required under the Safe Harbor principles.

If you believe that CAC Group is not complying with the Safe Harbor principles or this policy, contact our company by mail, e-mail, or telephone at:

Customer Asset Consulting Group, Inc.
1870 N. Roselle Road, Suite 101
Schaumburg, IL 60195

Telephone: 847-805-9800
Email: eusafeharbor@cac-group.com

If your inquiry with CAC Group has not been satisfactorily addressed, you should contact the DMA Safe Harbor Dispute Resolution Program. The DMA will then work with CAC Group to resolve your concerns. You can reach the DMA Safe Harbor Program at:

Safe Harbor
Direct Marketing Association
1615 L St, NW Ste 1100
Washington, DC 20036-5624

Email: safeharbor@the-dma.org

<http://www.dmaresponsibility.org/SafeHarbor/consumers.shtml>