

W. Capra Consulting Group Safe Harbor Privacy Policy

Introduction

W. Capra Consulting Group, Inc. (the “Company”) is a leader in Retail Payment Technology and Security Consulting. Protecting consumer privacy is important to the Company. The Company adheres to the U.S.-E.U. 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 the types of information we gather, 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 the Company 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

Company 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 the Company discloses or may disclose that Information. Company 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 the Company, or as soon as practicable thereafter, and in any event before the Company uses or discloses the Information for a purpose other than for which it was originally collected.

Choice

The Company 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 collected or subsequently authorized by the individual. For Sensitive Personal Information, the Company 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 collected or subsequently authorized by the individual. Company shall treat Sensitive Personal

Information received from an individual the same as the individual would treat and identify it as Sensitive Personal Information.

Onward Transfers

Prior to disclosing Personal Information to a third party, Company shall notify the individual of such disclosure and allow the individual the choice (opt out) of such disclosure. Company shall ensure that any third party for which Personal Information may be disclosed subscribes to the Principles or are subject to law providing 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

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

Data Integrity

Company shall only process Personal Information in a way that is compatible with and relevant for the purpose for which it was collected or authorized by the individual. To the extent necessary for those purposes, Company shall take reasonable steps to ensure that Personal Information is accurate, complete, current and reliable for its intended use.

Access

Company 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

Company uses a self-assessment approach to assure compliance with this privacy policy and periodically verifies that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented and accessible and in conformity with the Principles. We encourage interested persons to raise any concerns using the contact information provided and we will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of Personal Information in accordance with the Principles. If a complaint or dispute cannot be resolved through our internal process, we agree to dispute resolution using the EU Data Protection Authorities as a third party resolution provider

Amendments

This privacy policy may be amended from time to time consistent with the requirements of the Safe Harbor Frameworks found on the Safe Harbor website at: <http://www.export.gov/safeharbor/>. We will post any revised policy on this website. The Company is committed to following the Principles for all Personal Information within the scope of the Safe Harbor Frameworks. However, certain information is subject to policies of the Company that may differ in some respects from the general policies set forth in this privacy policy.

Contact Information

Questions, comments or complaints regarding the Company's Safe Harbor Policy or data collection and processing practices can be mailed or emailed to:

W.Capra Consulting Group
221 N LaSalle St, Suite 1325
Chicago, IL 60601
Attn: Tim Radway
tradway@wcapra.com