



HUMAN RESOURCE CONSULTING GROUP (HRCG) NOTICE OF CLIENT PRIVACY POLICY

Our Commitment to Your Privacy: HRCG has a long-standing policy of protecting the confidentiality and security of information we collect about our clients. We do not share nonpublic information about you (“Information”) outside of the HRCG family without your consent except for the specific purposes described below, in accordance with all applicable laws. This Notice describes the information we may gather and the circumstances under which we may share it.

Why We Collect and How We Use Information: We limit the collection and use of Information to the minimum we require to deliver superior service to you. Such service includes advising you about our products, services and other opportunities, maintaining your accounts with us, processing transactions requested by you or other persons authorized by you and administering our business.

How We Gather Information: We get most Information directly from you, when you apply for, access and use our and our business partners’ products and services – whether in person, by telephone or electronically. We may verify this information or obtain additional information from consumer reporting agencies or public sources. This information may relate to, but is not limited to, your company’s finances, credit history or business performance, as well as transactions and interactions with or through us or with others.

How We Protect Information: Our employees and representatives acting on our behalf are required to protect the confidentiality of Information and to comply with our established policies. They may access information only when there is an appropriate reason to do so, such as to administer or offer our products or services. We also maintain physical, electronic and procedural safeguards to protect Information, which comply with all applicable laws. Employees who violate our Privacy Policy will be subject to corrective action.

Disclosure of Information: We may disclose any Information when we believe it necessary for the conduct of our business, or where disclosure is required by law. For example, Information may be disclosed for audit or research purposes, to attorneys or other professionals, or to law enforcement and regulatory agencies. In addition, we may disclose Information to other HRCG companies or third party service providers (i) to enable them to provide business services for us, such as performing computer related or data maintenance or processing services for us, (ii) to facilitate the processing of transactions requested by you, (iii) to assist us in offering our or other HRCG companies’ products and services to you, or (iv) for credit review or reporting purposes. We may also provide Information to other HRCG companies or non-affiliated companies with which we have joint marketing agreements such as an agreement with a registered insurance broker enabling us to offer you certain of its products or services. Except in those specific, limited situations, without your consent, we will not make any disclosures of Information to other companies who may want to sell their products or services to you. For example, we do not sell customer lists and we will not sell your name to a catalogue company or telemarketer. Moreover, it is HRCG’s policy to require all third parties that are to receive any Information to sign strict confidentiality agreements.

Our Former Clients: Even if you are no longer a HRCG client, our Privacy Policy will continue to apply to you.

To Whom This Policy Applies: This Privacy Policy applies to HRCG and its affiliates – except to the extent that in special circumstances an affiliate has a special policy and sends notice of that policy to its clients who are affected by the special policy. This Privacy Policy applies to products or services provided by HRCG and which are used primarily for business purposes.

Access to and Correction of Information: Upon your written request, we may make available for your review any information we may maintain for your organization (with the exception of, for example, private health information); provided, however, that any Information collected in connection with, or anticipation of, any claim or legal proceeding will not be made available. If you notify us that any information is incorrect, we will review it. If we agree, we will correct or records. If we do not agree, you may submit a short statement of dispute that we will include in any future disclosure of the disputed information.

Further Information: We reserve the right to change this Privacy Policy at any time. Any examples contained within this Privacy Policy are illustrations and are not intended to be exclusive.