

Clifton Myers Enterprises US - EU Safe Harbor Privacy Statement

Clifton Myers Enterprises Inc. (the "Company") is committed to preserving personal privacy. As part of that commitment, the Company adheres to the Safe Harbor Principles administered by the United States Department of Commerce in consultation with the European Commission with respect to personal information within the scope of this Statement.

Scope

This Statement applies to all personal information knowingly received and processed by the Company in the United States from the European Economic Area including, but not limited to, personal information collected from the Company's business customers concerning their employees and/or customers in the context of the services the Company performs for its clients.

Definitions

"The Company" means Clifton Myers Enterprises Inc., its predecessors, and successors.

"Personal information" means information that identifies or reasonably may identify a natural person. Personal information does not include anonymized information or aggregate information to the extent an individual's identity cannot reasonably be derived from such information. In addition, the Company reserves all rights to use public information or information as to which an individual has given explicit consent for use, consistent with the Safe Harbor Principles.

"Agent" means any third party that processes, collects, or uses personal information pursuant to the instructions of, and solely for the benefit of, the Company, or to which the Company discloses personal information for use on its behalf.

"Sensitive personal information" means personal information that reveals a natural person's race, ethnic origin, political opinions, religious or philosophical beliefs, criminal record, or trade union membership, or that concerns a natural person's sex life or health.

Privacy Principles

The privacy principles in this Statement are based on and shall be interpreted in a manner not inconsistent with the Safe Harbor Principles.

Notice

The Company is contracted by its clients to process their employees' and/or customers' personal data for the purpose of business process outsourcing functions such as assistance with software functionality, development and support. During that process, information collected may include personal information about an individual. This information is collected to facilitate the Company's client's human resources information management and computer systems functionality in an efficient, organized, and comprehensive matter. The Company is not responsible for the content of the information it collects, which may include personal information, nor is it responsible for the way its clients treat their employees' and customers' personal information.

Choice

The Company generally does not collect information directly from individuals within the EEA. It merely acts as a data processor for its clients. If the Company does collect information directly from individuals within the EEA, it will offer such individuals the choice to opt out of having their personal information disclosed to a third party that is not an agent or used for a purpose other than for which it was collected originally. Similarly, to the extent required by the Safe Harbor Principles, the Company will offer individuals the choice to opt in to having their sensitive personal information disclosed to a third party that is not an agent or used for a purpose other than for which it was collected originally.

Onward Transfer

The Company will obtain reasonable assurances from its agents that they will safeguard personal information knowingly collected by the Company concerning individuals residing in the EEA consistently with this Statement and the Safe Harbor Principles. Examples of appropriate assurances may include (1) a contract obliging the agent to afford a level of protection to the personal information that is at least equivalent to the Safe Harbor Principles, (2) Safe Harbor certification by the agent, or (3) the agent being subject to EU Directive 95/46/EC or other law providing an adequate level of privacy protection.

Access

Upon an individual's request, if feasible, the Company will offer individuals reasonable access to their personal information and will afford individuals a reasonable opportunity to correct, amend, or delete inaccurate information. If an employee or customer of one of the Company's clients would like to access personal information about him or her that is maintained by the Company, the employee or customer should make a written request to his or her employer's local human resources representative or customer service information contact, as well as to the Company at the following address:

Clifton Myers Enterprises Inc.
17853 Santiago Blvd, #107-192
Villa Park, CA 92867
e-mail: safe.harbor@gotocme.com

For security and business purposes, the Company may have to coordinate such a response with the individual's employer or other applicable entity. The Company may then contact the employee or customer and ask him or her to provide it with various pieces of personal information to process the request. The Company may limit or deny access to personal information where providing such access would be unreasonably burdensome or expensive under the circumstances or as otherwise permitted by the Safe Harbor Principles.

Security

The Company will take reasonable measures including technical, physical, and administrative measures and training, as appropriate, to protect personal information from loss, misuse, and unauthorized disclosure, access, alteration, and destruction. The Company safeguards information according to established security standards and periodically assesses new technology for methods of protecting information. However, the Company cannot guarantee the security of personal information.

Data Integrity

The Company will take reasonable measures to ensure that personal information is relevant for its intended use, reliable for its intended use, accurate, complete, and current.

Enforcement and Dispute Resolution

The Company will conduct periodic assessments to confirm the accuracy of, and verify its adherence to, this Statement. The Company will investigate suspected infractions and will take all appropriate action. Any questions, concerns, or complaints concerning the collection and use of personal information by the Company should be directed to:

Clifton Myers Enterprises Inc.
Attn: Daniel Riscalla
17853 Santiago Blvd, #107-192
Villa Park, CA 92867
e-mail: safe.harbor@gotocme.com

The Company will conduct a reasonable investigation of and will attempt to resolve any complaints in accordance with the principles contained in this Statement. For complaints that cannot be resolved between the Company and the complainant, the Company agrees to participate in the dispute resolution procedures of the panel established by the European Data Protection Authorities to resolve disputes pursuant to the Safe Harbor Principles.

Limitations

The Company's adherence to the Safe Harbor Principles may be limited by any applicable legal, regulatory, ethical, or public interest consideration, and as expressly permitted or required by any applicable law, rule, or regulation. Examples of such limitations include (1) exceptions to the opt-in requirements for sensitive personal information permitted by Commission Decision 2000/520/EC of 26 July 2000, (2) exceptions on access as permitted by Safe Harbor Principles, or (3) limitations under applicable European Economic Area member state directives. The Company also may disclose personal information reasonably related to the sale or disposition of all or part of its business.

Internet Privacy

The Company maintains a distinct Internet Privacy Policy governing the privacy of information collected by the Company online through its United States site, which can be viewed at: <http://www.gotocme.com/pdfs/safeharbor.pdf> .

Modification of this Safe Harbor Privacy Statement

This Statement may be amended from time to time with or without notice in accordance with the Safe Harbor Principles. Any modified statement will be posted on the company's website for public viewing.

Contact Information

Questions, concerns, or complaints concerning the collection and use of personal information by the Company pursuant to this Safe Harbor Privacy Statement should be directed by mail or electronic mail to the following address:

Clifton Myers Enterprises Inc.
Attn: Daniel Riscalla
17853 Santiago Blvd, #107-192
Villa Park, CA 92867
e-mail: safe.harbor@gotocme.com