

Safe Harbor Privacy Policy

NetAge, Inc. (hereinafter NetAge) respects individual privacy and values the confidence of our clients, employees, business partners and others. NetAge strives to collect, use and disclose personal information in a manner consistent with the laws of the countries in which we do business, and we pride ourselves on upholding the highest ethical standards in our business practices. This Safe Harbor Privacy Policy (the "Policy") sets forth the privacy principles that NetAge follows with respect to personal information transferred from the European Union (EU) to the United States.

I. SAFE HARBOR

The United States Department of Commerce and the European Commission have agreed on a set of data protection principles and frequently asked questions (the "Safe Harbor Principles") to enable U.S. companies to satisfy the requirement under European Union law that adequate protection be given to personal information transferred from the EU to the United States. Consistent with its commitment to protect personal privacy, NetAge adheres to the Safe Harbor Principles.

II. SCOPE

This Safe Harbor Privacy Policy (the "Policy") applies to all personal information received by NetAge in the United States from the EU, in any format including electronic, paper or verbal. NetAge collects and processes Personal information for, among other things, the purpose of organizational analysis, including, but not limited to, mapping each position, which position it reports to, and which positions report to it. NetAge is the sole owner of information it collects and will not sell or share this information with third parties in ways different from what is disclosed in this Privacy Policy. On a global basis, NetAge will, and will cause its affiliates to, establish and maintain business procedures that are consistent with this Policy. Personal information collected by NetAge from prospective clients, vendors, business partners and others may be maintained at its corporate offices in West Newton, Massachusetts, USA, or at other NetAge facilities. All Personal information collected by NetAge will be used for legitimate business purposes consistent with this Policy.

III. DEFINITIONS

For purposes of this Policy, the following definitions shall apply:

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

"NetAge" means NetAge, Inc., its predecessors, successors, subsidiaries, divisions and groups.

"Personal information" means any information or set of information that identifies or is used by or on behalf of NetAge to identify an individual. Personal information does not include information that is encoded or anonymized, or publicly available information that has not been combined with non-public personal information.

"Sensitive personal information" means personal information that reveals race, ethnic origin, sexual orientation, political opinions, religious or philosophical beliefs, or trade union membership, or that concerns an individual's health. In addition, NetAge treats as sensitive personal information any information received from a third party where that third party treats and identifies the information as sensitive.

IV. PRIVACY PRINCIPLES

The privacy principles in this Policy are based on the Safe Harbor Principles.

(1) NOTICE: Where NetAge collects personal information directly from individuals in the EU, it will inform them about the type of personal information collected, the purposes for which it collect and uses the personal information, and the types of non-agent third parties to which it discloses or may disclose that information, and the choices and means, if any, it offers individuals 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 NetAge, or as soon as practical thereafter, and in any event before NetAge uses or discloses the information for a purpose other than that for which it was originally collected.

Where NetAge receives personal information from its subsidiaries, affiliates or other entities in the EU, it will use and disclose such information in accordance with the notices provided by such entities and the choices made by the individuals to whom such personal information relates.

(2) CHOICE: NetAge will offer individuals the opportunity to choose (opt-out) whether their personal information is (a) to be disclosed to a non-agent third party, or (b) 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, NetAge 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.

NetAge will provide individuals with reasonable mechanisms to exercise their choices.

(3) DATA INTEGRITY: NetAge will use personal information only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual. NetAge will take reasonable steps to ensure that personal information is relevant to its intended use, accurate, complete, and current.

(4) TRANSFERS TO AGENTS: NetAge will obtain assurances from their agents that they will safeguard personal information consistently with this Policy. Examples of appropriate assurances that may be provided by agents include: a contract obligating the agent to provide at least the same level of protection as is required by the relevant Safe Harbor Principles, being subject to EU Directive 95/46/EC (the EU Data Protection Directive), Safe Harbor certification by the agent, or being subject to another European Commission adequacy finding. Where NetAge becomes aware that an agent is using or disclosing personal information in a manner contrary to this Policy, NetAge will take reasonable steps to prevent or stop the use or disclosure.

(5) ACCESS AND CORRECTION: Upon request, NetAge will grant individuals reasonable access to personal information that it holds about them. In addition,

NetAge will take reasonable steps to permit individuals to correct, amend, or delete information that is demonstrated to be inaccurate or incomplete.

(6) SECURITY: NetAge will take reasonable precautions to protect personal information in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction.

(7) ENFORCEMENT: NetAge will conduct compliance audits of its relevant privacy practices to verify adherence to this Policy. Any employee that NetAge determines is in violation of this policy will be subject to disciplinary action up to and including termination of employment.

V. DISPUTE RESOLUTION: Any questions or concerns regarding the use or disclosure of personal information should be directed to the NetAge Privacy Office at the address given below. NetAge will investigate and attempt to resolve complaints and disputes regarding use and disclosure of personal information in accordance with the principles contained in this Policy. For complaints that cannot be resolved between NetAge and the complainant, NetAge has agreed 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.

LIMITATION ON APPLICATION OF PRINCIPLES

Adherence by NetAge to these Safe Harbor Principles may be limited (a) to the extent required to respond to a legal or ethical obligation; and (b) to the extent expressly permitted by an applicable law, rule or regulation.

CONTACT INFORMATION

Questions or comments regarding this Policy should be submitted to the following person by mail as follows:

NetAge, Inc.
Attention: Privacy Office
505 Waltham Street
West Newton, MA 02465 USA
Tel: 617-965-3340
Fax: 617-965-2341
Email: privacyoffice@netage.com

CHANGES TO THIS SAFE HARBOR PRIVACY POLICY

The practices described in this Policy are current Personal data protection policies as of 31 August, 2004. NetAge reserves the right to modify or amend this Policy at any time consistent with the requirements of the Safe Harbor Principles. Appropriate public notice will be given concerning such amendments.