

## Safe Harbor Privacy Statement

D4, LLC has adopted the 7 safe harbor principles published by the Department of Commerce. The following privacy principles apply to our collection, use, and disclosure of personal data from the European Economic Area.

**Notice:** D4 does not use customer data for any purpose incompatible with those purposes authorized in its client agreements. Sensitive information is not stored except as directed by D4 clients who own the data and does not transfer to third parties except as authorized by client.

**Choice:** where D4 collects personal information directly from individuals within the European Economic Area, D4 will offer the opportunity to choose (opt out) whether their personal information is:

- a) To be disclosed to a non-agent third-party or
- b) Can be used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual or corporation.
- c) For sensitive personal information, D4 will give individuals the opportunity to affirmatively and explicitly (opt in) consent if the information is to be disclosed to a third party or used for a purpose other than for which it was originally collected or subsequently authorized by the individual.
- d) D4 will provide individuals with reasonable mechanisms to exercise their choice should circumstances arise.

**Onward Transfer:** D4 will obtain assurances from its agents that they will safeguard personal information consistent with our own policies. If D4 becomes aware that an agent is using our disclosing personal information in a manner contrary to our policy, D4 will take reasonable steps to prevent or stop such processing.

**Security:** D4 will take reasonable and responsible steps to protect the personal information in its possession from loss, misuse, unauthorized access, or disclosure.

**Data Integrity:** D4 will use personal information only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual. D4 will take reasonable steps to ensure that personal information is relevant to its intended use, accurate, complete, and current.

**Access:** upon request, D4 will grant individuals reasonable access to personal information that holds about them. In addition, D4 will take reasonable steps to prevent individuals to correct, amend, or delete information that is demonstrated to be inaccurate or incomplete.

**Enforcement:** D4 utilizes the self-assessment approach to assure its compliance with its privacy statement, and will annually self certify with the US Department of Commerce as being in full compliance. D4 will conduct compliance audits to verify adherence to this policy. Any employee that D4 determines is in violation of this policy will be subject to disciplinary action.

D4 will investigate and attempt to resolve any complaints and/or disputes regarding violation of this privacy policy directly with the individual. All complaints/disputes should be addressed to:

D4, LLC  
300 Main Street  
Suite 4-102  
East Rochester, NY 14445  
safeharbor@d4discovery.com

If for any reason a complaint or dispute cannot be resolved through these mechanisms, a complaint can be submitted for mediation to **BBBOnline, EU Safe Harbor Program**.