

EU-US AND SWISS-US PRIVACY SHIELD POLICY

EU-US and Swiss-US Privacy Shield

Under the certification of its parent company, FTI Consulting, Inc., Compass Lexecon complies with the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks (collectively the “Privacy Shield”) as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the member countries of the European Union (EU), the European Economic Area (EEA), and Switzerland to the United States (“Personal Information”). FTI Consulting, Inc. has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view FTI Consulting’s certifications, please visit www.privacyshield.gov.

FTI Consulting’s participation in the Privacy Shield applies to personal data received from the EU/EEA and Switzerland. Compass Lexecon will comply with the Privacy Shield Principles in respect of such personal data. Some types of Personal Information may be subject to additional privacy-related requirements and policies, which are consistent with the Privacy Shield Principles. For example:

- Personal Information regarding and/or received from clients is also subject to any specific agreement with, or notice to, the client, as well as additional applicable laws and professional standards.
- Personal Information regarding Compass Lexecon personnel is subject to internal human resource policies.
- Personal Information received via Compass Lexecon’s websites is subject to this Web Privacy Policy.

Types of Personal Information Collected and Purpose for Collection

Personal Information from Client Engagements: Compass Lexecon provides professional consulting services to its clients. Compass Lexecon’s clients may send Personal Information to it for processing on their behalf as part of the consulting services they have purchased. For example, Compass Lexecon may receive Personal Information such as name, email address, employment information, or financial data. Compass Lexecon uses any such Personal Information to perform services for its clients and to administer and manage its relationships with its clients.

In the event that a client engagement involves a transfer of Personal Information from the EU to the United States, the relevant clients are responsible for providing appropriate notice, where required, to the individuals whose Personal Information may be transferred to Compass Lexecon, including providing individuals with certain choices with respect to the use or disclosure of their Personal Information, and obtaining any requisite consent. Compass Lexecon handles such Personal Information in accordance with its clients’ instructions.

Personal Information from Compass Lexecon Website Use: Compass Lexecon may collect Personal Information when you choose to access and use Compass Lexecon’s websites. Please see the Website Privacy Policy for more information regarding the types of Personal Information collected and the purposes of collection.

Personal Information Regarding Compass Lexecon Employees: Compass Lexecon may transfer Personal Information regarding Compass Lexecon personnel. This Personal Information may include, without limitation, business contact information, employee ID, job role and reporting line, demographic information, work history, compensation and performance ratings. Compass Lexecon uses such information to administer and manage its business.

Choice and Accountability for Onward Transfer

Compass Lexecon will not transfer, disclose, sell, distribute, or lease your Personal Information to third parties other than as described in this Privacy Policy unless it has your permission or is required or permitted by law (including to meet national security or law enforcement requirements). Compass Lexecon may share such information with its affiliates as necessary to carry out the purposes for which the information was supplied, collected, or received. Similarly, third party contractors, consultants and/or vendors engaged by Compass Lexecon to assist it in providing its services may have access to such Personal Information (these third parties must first agree to maintain the strict confidentiality of such information and provide the same level of data security as provided by Compass Lexecon). Compass Lexecon remains responsible and liable under the Privacy Shield Principles if third party agents that it engages to process the personal data on its behalf do so in a manner inconsistent with the Principles.

Information Security and Data Integrity

Compass Lexecon has reasonable security policies and procedures in place to protect Personal Information from unauthorized loss, misuse, alteration, or destruction.

Despite Compass Lexecon's best efforts, however, security cannot be absolutely guaranteed against all threats. To the best of Compass Lexecon's ability, access to your Personal Information is limited to those who have a need to know.

Access

If Compass Lexecon holds your Personal Information, under most circumstances you have the right to reasonable access to that data to correct any inaccuracies. You can also make a request to update or remove information about you by contacting, privacy@fticonsulting.com who will make all reasonable and practical efforts for its business practices to comply with your request, as long as it is consistent with applicable law and professional standards.

Recourse, Enforcement and Liability

Compass Lexecon commits to resolve complaints about your privacy and its collection or use of your Personal Information in compliance with the EU-US and Swiss-US Privacy Shield Principles. Please contact FTI Consulting at: privacy@fticonsulting.com should you have a Privacy Shield-related (or general privacy-related) complaint.

If you are a resident of the EU/EEA, and you have a complaint related to this Policy that cannot be resolved with Compass Lexecon directly, you may report your claim to the EU/EEA Data Protection Authorities located in your jurisdiction. If you are a resident of Switzerland, and you have a complaint related to this Policy that cannot be resolved with Compass Lexecon directly, you alternatively may report your claim to the Swiss Data Protection Authority (Federal Data Protection and Information

Commissioner). As further explained in the Privacy Shield Principles, a binding arbitration option will also be made available to you in order to address residual complaints not resolved by any other means.

Compass Lexecon is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC).

Changes to this Policy

FTI Consulting reserves the right to make changes to this EU – US and Swiss – US Privacy Shield Policy from time to time. Compass Lexecon will notify you by posting amendments on this website.

Questions and Comments

If you have questions or concerns regarding this policy or Compass Lexecon’s Personal Information processing policies, please contact Compass Lexecon at: privacy@compasslexecon.com.