



Safe Harbor Privacy Policy

EFFECTIVE DATE

March 4, 2013

The Allied Group complies with the U.S. – E.U. Safe Harbor Framework and the U.S. – Swiss Safe Harbor Framework as set for the by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. The Allied Group has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program and to view The Allied Group's certificate, please visit <http://www.export.gov/safeharbor/>

The Allied Group respects individual privacy and values the confidence of their customers, employees, consumers, business partners and others. The Allied Group strives to collect, use and disclose personal information in a manner consistent with the laws of the countries in which they do business. This Safe Harbor Privacy Policy (the "Policy") sets forth the privacy principles that The Allied Group follows with respect to personal information transferred from the European Union (EU) and Switzerland to the United States.

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 "U.S.-EU Safe Harbor Framework") 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. The United States Department of Commerce and the Federal Data Protection and Information Commissioner of Switzerland have agreed on a similar set of data protection principles and frequently asked questions (the "U.S.-Swiss Safe Harbor Framework") to satisfy a similar requirement under Swiss law regarding personal information transferred from Switzerland to the United States. Consistent with its commitment to protect personal privacy, The Allied Group adheres to the U.S.-EU and U.S.-Swiss Safe Harbor Frameworks.

Scope

This Safe Harbor Privacy Policy (the "Policy") applies to all personal information

received by The Allied Group in the United States from the European Economic Area and Switzerland, in any format including electronic, paper or verbal.

Definitions

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

The Allied Group, Inc, “means The Allied Group, a Rhode Island based Company in the USA.

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

"Sensitive" 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 The Allied Group will treat as sensitive personal information any information received from a third party where that third party treats and identifies the information as sensitive.

Notice: The Allied Group enters into printing, kitting, fulfillment, mailing and email marketing agreements with its clients in the EU or Switzerland which may include the processing of information relating to their clients' customers. In these agreements, the EU or Swiss client agrees and recognizes that it is the 'data controller' for the purposes of data protection legislation. This means that our EU or Swiss clients are responsible for complying with the data protection legislation in the relevant Member State national law before it sends its customer data to The Allied Group for processing. Any data processed by The Allied Group is only disclosed to third parties at the request and direction of its European client as the data controller, or when required by law. Any information that our EU or Swiss clients identify as sensitive will be treated as such.

The Allied Group has a Privacy Manager who is responsible for the internal supervision of The Allied Group privacy policies. The Allied Group also has an individual to handle data security. The Allied Group continuously educates its employees about compliance with the Safe Harbor Principles and has self-assessment procedures in place to ensure its compliance. The Allied Group participates in the U.S.-EU and U.S.-Swiss Safe Harbor Framework as set forth by the United States Department of Commerce.

Security: The Allied Group will take reasonable precautions to protect personal information in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction.

Enforcement: The Allied Group will conduct compliance audits of its relevant privacy practices to verify adherence to this Policy. Any employee that The Allied Group determines is in violation of this policy will be subject to disciplinary action up to and including termination of employment.

DISPUTE RESOLUTION: Any questions or concerns regarding the use or disclosure of personal information should be directed to The Allied Group Privacy Manager at the address given below. The Allied Group 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 The Allied Group and the complainant, The Allied Group has agreed to participate in the dispute resolution procedures of the American Arbitration Association pursuant to the Safe Harbor Principles.

LIMITATIONS ON APPLICATION OF PRINCIPLES

Adherence by The Allied Group to these Safe Harbor Principles may be limited (a) to the extent required or permitted by law or legal process, such as to respond to or investigate a legal or ethical obligation or request or pursuant to court orders, subpoenas, interrogatories or similar directive carrying the force of law; 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 The Allied Group Privacy Officer by mail as follows:

The Allied Group
Privacy Officer
25 Amflex Drive
Cranston, RI 02921

CHANGES TO THIS SAFE HARBOR PRIVACY POLICY

This Policy may be amended from time to time, consistent with the requirements of the Safe Harbor Principles. A notice will be posted on The Allied Group web page (www.thealliedgrp.com) for 60 days whenever this Safe Harbor Privacy Policy is changed in a material way.