

Client Privacy

Purpose

To set forth an AMCI policy regarding the confidentiality of client information.

Atlantic Management Center, Inc. (AMCI) recognizes the importance of privacy to clients and is committed to assuring that the privacy and confidentiality of client information is respected and preserved. Unless you give us explicit permission, we will not share your personally identifiable information such as name, address, or e-mail address with third parties for any purpose, unless required by law to do so.

Scope

AMCI employs industry standard security measures to protect the security of all data. Data stored on AMCI's servers is treated as proprietary and confidential and is not available to the public. Only authorized employees and contractors have access to the personally identifiable data you provide, and that access is limited by need. Our employees and contractors who have access to this data have agreed to maintain the confidentiality of this information.

This policy applies to all AMCI clients.

Policy

It is the policy of AMCI to ensure that information submitted by our clients is safe from improper disclosure. AMCI recognizes a client's right to privacy. AMCI complies with the U.S.-EU Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries. AMCI 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 AMCI's certification, please visit https://www.export.gov/safeharbor_eu

In achieving this goal, AMCI adopts these basic principles:

- AMCI will never sell, share, or otherwise intentionally transfer any of our client's personal information.
- The collection of client information will be limited to that which is needed by the company for business and legal purposes.
- All in-house employees involved in record keeping will be required to follow company policies and practices. Violations will result in disciplinary action.
- Internal access to client records will be limited to those employees having an authorized, business-related need-to-know. Access, under these conditions, may also be given to third parties, including legal advisors or when legally required to do so.
- A client must give written permission before there will be external disclosure of his/her/its information, with the exception of the following information: reference checks such as verification of dates of business relationship. In this case, verification means stating whether or not the information provided by the external party is accurate.
- A client who questions the accuracy or completeness of information contained in his/her/its file may submit a written statement which will be attached to the information.
- In addition, client data which is stored electronically on our secure, dedicated servers within our private network is protected by limiting physical access to authorized system administrators. Data is further protected by redundant power and Internet connections in the event of outages. All systems are protected behind firewalls and VLANs are utilized to ensure a private network security.

Notification Changes

If we materially change our practices in handling personally identifiable information, as described in this statement, we will notify you by posting the changes on this Privacy Statement at least 30 days prior to their implementation.

Contacting AMCI

- AMCI encourages consumers to contact us directly if they have cause for a legitimate complaint and we will do our utmost to resolve said complaint. However, in the event that it cannot be resolved without proceeding to an independent recourse mechanism AMCI will provide full and readily available information on the procedure for the complaint resolution process
- Should you have questions regarding our Privacy Statement as it relates to your use of AMCI's services, please contact us at amci@amciweb.com.