

ALE Privacy and Data Protection Policy
October 17, 2016

The present Policy applies worldwide to ALE International and its affiliated entities, collectively (“ALE” or “we”, “us”, “our”).

This Policy explains what information we collect about you and why, what we do with that information, how we share it, and how we handle the personal information created, inputted, submitted, posted, transmitted, stored or displayed by you when accessing and using our Services.

What this Policy covers:

- The websites that link to this Policy
- The Services to which you have subscribed or registered

ALE recognizes that, in order to conduct a successful business in an increasingly electronic economy, the processing of personal data, which includes, but is not limited to, collecting, using, retaining/storing, accessing and/or disclosing, by ALE is often necessary.

In addition, ALE recognizes the legal rights and expectations of its employees and third-party workers, or similar personnel, and customers and other third parties conducting business with or on behalf of ALE (“Individuals” or “Data Subjects”) as they relate to the privacy and protection of the Individual’s personal data.

Personal data or personal identifying information (“Personal Data”) means information that is, or can be, about or related to an identifiable individual or used, directly or indirectly, to identify an individual. Information collected by ALE about Individuals, to a large extent, is likely to be considered personal data. Some examples of personal data are name, home or email address, identification number (UPI), physical characteristics as well as information about performance and/or behavior.

It is the goal of ALE to balance the benefits of a global and centralized business with the Individual’s valid interests in privacy and having his or her personal data protected. ALE is committed to respecting the Individual’s privacy rights and legitimate expectations and to protecting the Individual’s Personal Data collected by ALE from unauthorized access, use, retention/storage and/or disclosure.

Meeting this commitment is a primary management objective and the individual and collective responsibility of ALE and employees as well as third parties conducting business with or on behalf of ALE.

To that end, ALE is committed to:

Transparency: Providing required notices to Individuals relating to the processing of their personal data by ALE, employees and third parties acting with or on behalf of ALE. ALE will provide required notices to its employees and all interested

third parties, which notices shall disclose to Data Subjects as required the purpose(s) for which such Individuals' personal data are being collected, used, retained/stored, disclosed or otherwise processed as well as any other information on the data processing required by applicable law.

Choice and consent: Informing Individuals of the available choices they may have relating to the processing of their personal data and, when required, obtaining the required consent of such Individuals, either implicit or explicit. Wherever appropriate, Individuals will be informed of their available options in providing such personal data (e.g., "opt-in" or "opt-out"). In addition, ALE will seek to obtain, where required, the implicit or explicit consent of such Individuals with respect to the collection, use, retention and disclosure of their personal data.

Data Subject access: Providing Data Subjects with access to their personal data for review and updates. Individuals will have the right to review their personal data and make corrections or updates, request data blocking where applicable or to object, for legitimate reasons, to the processing of their personal data. Individuals also may have the right to withdraw their consent, if necessary, to the collection, use, retention and disclosure of their personal data. ALE shall have processes in place to ensure that the Individual requesting review or updates to his or her personal data is the correct person.

Proportionality: Collecting personal data only as required for lawful and legitimate purposes, using personal data only for the purpose(s) for which the data have been collected or for which required consent has been obtained, and retaining such personal data only for the period of time required to fulfill the purpose(s), subject to local laws.

ALE will collect personal data as legally permitted and will collect only the personal data that are relevant and useful for lawful business purposes consistent with notices provided to the Data Subject, and proportional to those purposes. ALE will use personal data only for the purpose(s) for which the data were collected, or for additional lawful purposes for which implicit or explicit consent has been obtained, when required.

Personal data may be retained only as long as necessary to fulfill the permitted purpose(s) and in compliance with the retention period(s) permitted by the applicable country's laws, and ALE will then appropriately dispose of such information.

Disclosure: Disclosing personal data to third parties only for a legitimate and identified purpose(s) and, where required by law, with the implicit or explicit consent of the Data Subject. ALE and employees will disclose personal data to third parties only for valid business reasons. The Individual's implicit or explicit consent will be obtained when required.

In addition to the execution of a non-disclosure agreement for the protection of confidential information, ALE will require a commitment by third parties receiving personal data to adhere to all applicable requirements of this ALE Privacy and Data Protection policy and related procedures, as well as the data privacy and protection law(s) of the applicable countries.

Data protection: Securing personal data from unauthorized access and use. Appropriate information security safeguards, in accordance with the Information Security Policy, will be used to protect both physical and electronic personal data, in any format or media, against unauthorized access and use.

Data quality: Working to ensure the quality of the personal data collected, used, retained and disclosed. ALE will have in place processes and procedures intended to ensure that the personal data collected remain accurate, complete and relevant for the purpose(s) described in the applicable notice made available to Individuals at the point of collection.

Monitoring and enforcement: Monitoring and enforcing compliance with the ALE Privacy and Data Protection Policy and the privacy and data protection laws of the applicable countries. It is the responsibility of ALE personnel, affiliates and joint ventures to comply with the ALE Privacy and Data Protection Policy and associated procedures, and the applicable laws providing for the privacy rights of Individuals and protection of their personal data. ALE shall have processes and procedures in place for periodically assessing and verifying compliance with these requirements.

In addition, ALE will have processes and procedures in place to handle complaints and disputes relating to the collection, use, retention and disclosure of personal data.

Management and accountability: Assigning and supporting the management and accountability of its Privacy and Data Protection Policy and associated procedures. ALE shall maintain a Privacy & Data Protection governance structure (“core team”) under which the Information security officer and the Data privacy officer and such other positions and bodies as may be required or useful, shall have defined responsibilities for defining, documenting, promoting and communicating the ALE Privacy and Data Protection Policy and programs, and for developing and implementing processes and procedures to ensure compliance with those policies and procedures as well as applicable privacy and data protection laws.

Log file information: When you use the ALE Sites, our servers automatically record certain information that your “client” (either your connect through your computer and/or mobile) sends whenever you visit any website. These server logs may include information such as your web request, Internet Protocol (“IP”) address, browser type, browser language, referring / exit pages and URLs, platform type, number of clicks, domain names, landing pages, pages viewed and the order of those pages, the amount of time spent on particular pages, the date and time of your request, one or more cookies that may uniquely identify your browser, your

email address you are requesting the Content of and various Content information.

When you use ALE Services, our servers log certain general information that our application sends whenever the services is used.

Changes and updates to this Data Privacy Policy

This ALE Data Privacy Policy may be revised periodically and this will be reflected by the "effective date" below. Please revisit this page to stay aware of any changes. Your continued use of the ALE Site and ALE Service constitutes your agreement to this Privacy Policy and any amendments.