



MBS's Online Privacy Statement

Our Commitment to Privacy

Managed Business Solutions, LLC, a certified Alaska Native Corporation (“MBS”) respects your privacy and this privacy policy (“Privacy Policy”) is designed to assist you in understanding the collection, use, and safeguarding of information you may provide to MBS, as well as ways to review and revise the information you provide. This Privacy Policy applies to information submitted via the web sites of MBS and its affiliated sites and online properties (collectively, the “MBS Network”) as well as information submitted to MBS through telephone and other traditional communications. **BY ACCESSING, BROWSING, USING THE MBS NETWORK OR OTHERWISE SUBMITTING INFORMATION TO THE MBS NETWORK AND/OR MBS, YOU ACKNOWLEDGE THAT YOU HAVE READ, UNDERSTAND AND AGREE TO THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY AND ANY OTHER TERMS OF USE PUBLICLY PRESENTED BY MBS. IF YOU DO NOT AGREE TO THESE TERMS AND CONDITIONS, PLEASE DO NOT SUBMIT THE INFORMATION DESCRIBED BELOW TO MBS AND DISCONTINUE YOUR ACCESS TO OR USE OF THE MBS NETWORK.**

The Information We Collect

MBS gathers, processes, and stores personal data for the following purposes: developing and administering compensation, benefits, and other human resources programs, including education and training programs and other employment related obligations; monitoring and evaluating the conduct and performance of employees and other candidates, contractors and temporary workers; collecting, storing, maintaining and processing, customer, supplier, candidate, contractor, temporary worker and third party data (including data relating to persons potentially and prospectively within the foregoing categories); provision of services to third parties such as payroll processing, employment screening, reporting and procurement; legal requirements and obligations, including but not limited to statutory regulations and contractual requirements and obligations; and auditing requirements associated with regulatory, accounting and financial purposes.

MBS also gathers, processes, and stores non-personally identifiable and anonymous aggregate information (such as how many users log into the MBS web site). Unless you provide it to us voluntarily or the information is collected via cookies in the manner described in this policy, MBS does not collect Personal Information in connection with your use of this web site.

Please read this policy carefully to learn how you can verify the accuracy of any Personal Information we have concerning you and how you can request that MBS delete or update your Personal Information.

In order to accommodate your information request, we ask you to submit your name, title, company affiliation (if any), mailing address, telephone number, e-mail address, and any other relevant comments.

How We Use Cookies and Other Technologies

General – When you visit MBS web sites, information about your browser type, operating system, IP address, and the domain name from which you access the sites (e.g., yahoo.com) is collected. In addition, we may collect information about your browsing behavior, such as the number of times you have visited the site, the date you visited the site and the amount of time you spent viewing the site. This information is used solely for our internal purposes in managing the site and improving its functionality, thereby enhancing site usability. The collection of such information is subject to the terms set forth in this policy.

The Information We Disclose

MBS may elect to transfer selected information to a third party acting as an MBS agent (“Service Provider”) for specific business requirements (e.g. third party payroll processing, employment screening services, etc.). Any access to such information will be limited to the purpose for which such information was provided to us or to our Service Providers.

Links and Third-Party Web Sites

This policy applies only to MBS web sites. This site includes links to non-affiliated web sites, including access to content, products and services of such non-affiliated sites. In some cases, these other sites are made available via “seamless experience” technology,



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and may appear to be part of our web site. Although some of the entities controlling these sites are under contract with MBS, we urge you to familiarize yourself with the individual privacy and other terms for each linked web site prior to submitting your personally identifiable information.

How to Request Changes to Personal Information

You are entitled to request that MBS:

- Provide you with a copy of your Personal Information that it holds;
- Correct any errors in that Personal Information; and
- Update that Personal Information as required.

If you would like to receive a copy of the Personal Information we have about you as submitted to us via this web site, please send a request to info@mbshome.com. If this information is incorrect, please let us know by sending a request to info@mbshome.com, and we will make every reasonable effort to correct or update it promptly (unless we require further information from you in order to fulfill your request). You may also ask us to remove your name and other Personal Information from our databases. In each of the foregoing cases, we will make all reasonable efforts to honor your request promptly, subject to legal and other permissible considerations.

If your requested change involved information you submitted as an employee, potential candidate, or contractor of MBS, please contact info@mbshome.com to request changes to your Personal Information.

Notification of Changes

MBS may, in its sole discretion, update this policy at any time and from time to time, by posting the amended policy on this web site. If we make material changes to this policy that affect our treatment of your Personal Information, we will provide you with e-mail or postal mail notice and a choice to opt in under the terms of the revised policy. After the changes take effect, all newly collected Personal Information will be subject to the terms of the revised policy and all previously collected Personal Information will be handled in accordance with your response to our opt-in notice (in accordance with the revised policy if you opt in and in accordance with the previous policy if you do not opt in). If no material changes have been made to this policy that affect our treatment of your Personal Information, the amended policy shall be effective upon posting and your access to or use of the site following an update shall be deemed consent to the revised policy. We urge you to refer back to this page regularly and especially prior to providing any Personal Information via this web site. This policy may not be otherwise amended without the written consent of MBS. This Policy was last updated April 1, 2007.

Children

MBS is concerned about the safety of children when they use the internet and will never knowingly collect Personal Information from minors (children under 13 years of age, or any other age defined under applicable law) [without prior written verifiable parental consent]. If we become aware that a minor is attempting to or has submitted Personal Information via this web site, we will notify the user that we may not accept his or her Personal Information. We will then remove any such Personal Information from our records.

How We Protect and Store Your Information

MBS takes seriously the security of the information it collects. MBS has therefore implemented technology and security policies and procedures intended to reduce the risk of accidental destruction or loss, or the unauthorized disclosure or access to such information appropriate to the nature of the data concerned. For personal data associated with individuals located in the European Union (EU), MBS abides by a self-regulatory program in compliance with the privacy requirements of the Safe Harbor Program promulgated by the U.S. Department of Commerce in consultation with the European Commission and approved by the EU in July of 2000 (note 1; see <http://www.export.gov/safeharbor>).



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MBS's Privacy Principles

MBS commits to the following:

- **Notice.** MBS only collects information that is needed. From its valued customers, MBS collects information that will enable us to administer our customers' accounts per contractual agreements, to obtain information that may be helpful to MBS in administering and enhancing its web site, and to fulfill any regulatory or legal requirements. We keep our customers informed as to what information we are collecting and how that information will be used.
From its valued employees, MBS collects information that will enable it to manage employee benefits and related benefit plan administration, for human resources management purposes and staff training and for immigration purposes, as well as to fulfill any regulatory or legal requirements.
- **Data Integrity.** MBS uses security procedures and safeguards that it considers appropriate for the level of Personal Information our customers or employees are providing to MBS. MBS's goal is to prevent unauthorized access, maintain data accuracy and integrity, ensure the appropriate use of information and use professional industry standards to protect against the loss, misuse or alteration of information under MBS's control in connection with its information management services.
- **Security.** In addition to using customer or employee information to fulfill requests received from its respective customers or employees, MBS discloses information provided to it when required to do so by law or by a regulatory agency. In addition, MBS may share, as appropriate, with unaffiliated third parties that are under contract to perform services for or on behalf of MBS (*Service Providers*) (who are required to uphold and maintain policies with respect to privacy and the treatment of your Personal Information) and/or to a third party in connection with a proposed or actual sale, merger or transfer of all or a portion of a business or division.
- **Onward Transfer.** MBS's expectations for its Service Providers. MBS expects its Service Providers, who may have access to Personal Information furnished to us by our customers or employees for purposes of providing services to MBS, to honor privacy principles set forth herein, whether such Service Providers are accessing customer or employee information and considers a Service Provider's commitment to privacy and security as part of its decision-making process as to which Service Providers it selects as its business partners.

Questions Regarding This Policy

If you have any questions about our privacy policy, please contact our Director of Privacy at 719-314-3400, ext. 4966 (if calling from within the USA) or 011-719-314-3400 (if calling from outside the USA) or via e-mail at info@mbshome.com or by writing to the Director of Privacy, MBS, 12265 Oracle Blvd., Suite 105, Colorado Springs, CO 80921, USA.

Note 1. The European Commission's Directive on Data Protection went into effect in October, 1998, and would prohibit the transfer of personal data to non-EU nations that do not meet the European "adequacy" standard for privacy protection. While the United States and the European Union share the goal of enhancing privacy protection for their citizens, the United States takes a different approach to privacy from that taken by the European Union. The United States uses a sectoral approach that relies on a mix of legislation, regulation, and self regulation. The European Union, however, relies on comprehensive legislation that, for example, requires creation of government data protection agencies, registration of databases with those agencies, and in some instances prior approval before personal data processing may begin.

In order to bridge these different privacy approaches and provide a streamlined means for U.S. organizations to comply with the Directive, the U.S. Department of Commerce in consultation with the European Commission developed a "Safe Harbor" framework. The Safe Harbor – approved by the EU in July of 2000 – is an important way for U.S. companies to avoid experiencing interruptions in their business dealings with the EU or facing prosecution by European authorities under European privacy laws. Certifying to the Safe Harbor will assure that EU organizations know that a company provides "adequate" privacy protection, as defined by the Directive.

For more information about the Safe Harbor Program, please go to <http://www.export.gov/safeharbor>.