



4665 Southwest Freeway
Houston, TX 77027
Phone: 713.328.4400
Fax: 713.355.5882
www.situs.com

PRIVACY POLICY

POLICY ON DATA PROTECTION AND PRIVACY OF PERSONAL INFORMATION

In order to consider your application for employment, The Situs Group of Companies ("Situs") may collect nonpublic personal information from you. Your trust is important to us, and we respect the confidentiality and privacy of your information. This Privacy Notice explains certain steps we have taken to ensure the privacy of nonpublic personal information.

SCOPE

Situs is a global organization, with subsidiary and affiliated legal entities, business processes, management structure and technical systems that cross international borders.

We have global operations, and have developed global data practices from industry guidelines and standard local, national and international laws and requirements, designed to provide protection for Personal Information (as defined below), globally. All privacy practices and methods described herein apply only to the extent permitted by the applicable standards, laws, and requirements of your country's privacy regulations. We may share your Personal Information within Situs which may involve transferring it to countries in the world where we do business. Some countries may provide more and some countries may provide less legal protection for your information. In such countries that provide less legal protection, Situs will strive to adhere to the principles set forth in this Privacy Policy even if, in connection with the above, we transfer your Personal Information from your country to countries that may not require an "adequate" level of protection for your Personal Information, in accordance with the Safe Harbor principles.

In other words, our goal is to provide protection for your Personal Information no matter where that Personal Information is collected, transferred or retained.

Situs respects the privacy of applicants seeking employment with Situs ("Applicants").

We recognize the need for appropriate protection and management of Personal Information that is provided to us. Situs has established this Privacy Policy to inform you of the principles by which Situs protects information and data it receives from or about you and how it "Processes" such information and data in connection with your application for employment with Situs, anywhere in the world. "Processing" means any online and offline processing and includes such activities as copying, filing, and inputting your Personal Information and Sensitive Data (as defined below) into a database.

INTERNATIONAL COMPLIANCE

In light of the international nature of our business, Situs monitors privacy legislation on a worldwide basis. Situs believes its privacy practices are in compliance with the United States Safe Harbor Principles, the European Union Data Protection Directive, the United Kingdom Data Protection Act, the Japanese Personal Information Protection Law, the Hong Kong Data Protection Principles, the Australian National Privacy Principles, the New Zealand Information Privacy Principles and similar principles, laws and regulations established by other countries. Adherence to such principles may be limited in certain cases to the extent necessary to meet local national security, emergency, public interest, or law enforcement requirements. Situs Systems' privacy practices may be updated from time to time, in Situs's discretion.

CHOICE AND CONSENT

In connection with a job application or inquiry, whether advertised on a Situs website or otherwise, you may provide to Situs information about yourself, such as that on your resume or curriculum vitae. Situs does not require you to provide Situs with your Personal Information. The decision to divulge your Personal Information is your decision; it is a voluntary choice that is made solely by you. Situs may use this information throughout Situs, its subsidiaries and its related entities for the purpose of employment consideration or your inquiry. If you do not wish to provide the Personal Information requested, however, you may not be able to proceed with the activity or receive the benefits for which the Personal Information is being requested. Except as expressly stated otherwise in this Privacy Policy, you may opt out of having Situs share Personal Information with third parties, or allowing Situs to use it for a purpose incompatible with the purpose for which it was originally collected or authorized, by notifying Situs in writing. Except when you tell us not to, we may keep the information for future consideration.

If Situs receives unsolicited Personal Information about you, whether directly or through a third party, Situs will only use such Personal Information as may be necessary for, or directly related to, its purpose of assessing you for suitability for employment, and will not use the Personal Information for any other purposes unless you consent.

INFORMATION SITUS COLLECTS

"Personal Information" is data or information that can be used to identify or contact a specific individual, such as a name, address, telephone number or email address. Personal data collected during the course of the recruitment selection process may also include a written assessment of the Applicant recorded in a selection interview, an assessment report of any tests that you may be required to undertake, including but not limited to psychological tests, and personal references obtained from your current or former employers or other sources. Personal Information may also include your work experience, skills, competencies, academic or professional qualifications, character references or other attributes required for the open position. Situs may collect certain



information about Applicants, individually or collectively. However, Situs does not collect Personal Information when an Applicant visits Situs Systems' Human Resources web sites unless the Applicant chooses to disclose such Personal Information.

PERSONAL INFORMATION FILE

Situs will establish a personal information file concerning you as an Applicant. The purpose of the file is the administration of, and maintenance of records concerning, your application for employment with Situs or one of its affiliates or subsidiaries. Your Personal Information will only be available to you, Situs or its affiliates or subsidiaries, government authorities and its and their duly authorized employees, agents, and representatives (including third parties), for or related to the purpose of the file, except as otherwise may be required, authorized or allowed by law or legal process, or by you. By submitting a written request to Situs, you may exercise rights of access to, and correction of, the file. In all cases, availability is subject to lawful determination by Situs, its affiliate or subsidiary. Personal Information is collected, used, disclosed or otherwise processed or handled in accordance with applicable local law.

HOW PERSONAL INFORMATION IS USED

Situs uses Personal Information to consider candidates for employment opportunities and to negotiate and make offers of employment to selected applicants, to the extent allowed by applicable local law. Situs uses Personal Information about Applicants in connection with the administration of Human Resources programs and functions and for purposes of communicating with Applicants. Except as provided in this Privacy Policy, Situs does not use Personal Information for other than the stated purpose for which such information is collected. Personal Information given to Situs may be transferred across state and country borders for administration, consolidation, storage and simplified information management purposes.

SHARING OF PERSONAL INFORMATION

In some cases Situs contracts with third party services providers and suppliers to collect, use, analyze and otherwise process information on its behalf, in order to deliver complete Human Resources programs and services. Situs may share Personal Information with its service providers and suppliers for the sole purpose and only to the extent needed to support Situs in connection with its Human Resources programs and functions, and to the extent allowed by applicable local law. Except as set forth below, Personal Data is not shared with third parties for non-employment related purposes.

Situs may transfer information to a third party acting as an agent for Situs, such as an outside benefits administrator, by making sure that the third party enters into an agreement with Situs in which the third party promises to provide the same level of protection as required by applicable local law. Third parties receiving Personal Information are expected to apply the same level of privacy protection as contained in this Privacy Policy.

Circumstances may arise where, whether for strategic or other business reasons, Situs decides to sell, buy, merge or otherwise reorganize businesses in some countries. Such a



transaction may involve the disclosure of Personal Information to prospective or actual purchasers, or receiving it from sellers. It is Situs practice to seek appropriate protection for Personal Information in these types of transactions.

Except as provided above, Situs will not share Personal Information with any other third party without your permission, unless required by, or in connection with, law enforcement activities, subpoenas, or other litigation, or applicable local law. Situs will not sell, trade or lease Personal Information to others.

YOUR APPLICATION FOR EMPLOYMENT

During the recruitment process, we collect personal information required to assess your suitability with respect to an employment opportunity.

This information will include but is not necessarily limited to the following:

- Work history
- Job data
- Education
- Compensation
- Employment feedback
- Interview feedback

We will not contact any current or previous employers or other references without your prior knowledge.

We may pass your application for employment on to one of our wholly owned subsidiaries or affiliated companies in the process of exploring employment opportunities for you. As a result, you may be contacted directly by one of these companies. We will not however, pass this information outside of our “broader” organization without your prior consent unless legally required to do so.

Please be aware that submission of your resume indicates consent with the above noted policy. You may withdraw consent at any time by sending us an e-mail at the above link, which should include the date of your original resume submission.

SENSITIVE DATA

"Sensitive Data" is data that pertains to racial or ethnic origins, political or religious or philosophical beliefs, or an individual's health or sexual orientation. Situs does not request or receive Sensitive Data from its web sites. Situs may need to receive Sensitive Data in connection with the administration of one or more of its Human Resources programs, or as part of government mandated recordkeeping requirements. For Sensitive Data, you must make an affirmative choice (opt-in) before Situs will disclose the Sensitive Data to a third party or use Sensitive Data for a purpose other than its original purpose or the purpose authorized. Access to Sensitive Data will be limited to those Situs employees and Situs authorized third parties with a need to know. However, Sensitive Data will not be shared with third parties without your affirmative acceptance, or unless required by, or in connection with, law enforcement activities, subpoenas, or other



litigation, or as required by applicable law. In addition, Sensitive Data will not be used for a purpose other than its original purpose without your written approval. Further, Situs will treat as Sensitive Data information received from a third party where the third party treats and identifies the information as Sensitive Data.

ACCESS TO YOUR OWN PERSONAL INFORMATION AND SENSITIVE DATA

Upon request, you may access Personal Information about yourself and may have inaccurate information corrected. Situs will provide you with access to your Personal Information and Sensitive Data maintained by Situs, including making reasonable efforts to provide you with online access and the opportunity to change Personal Information and Sensitive Data yourself. To protect your privacy and security, Situs will use reasonable steps to verify your identity, such as a password and user ID, before granting access to your own Personal Information and Sensitive Data.

DATA INTEGRITY AND SECURITY OF PERSONAL INFORMATION AND SENSITIVE DATA

Situs takes reasonable steps to ensure that Personal Information and Sensitive Data are accurate, complete and current. All Applicants are asked to inform Human Resources immediately in the event of changes in Personal Information or Sensitive Data. Situs takes reasonable precautions to protect Personal Information and Sensitive Data from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. These precautions include password protection for online information systems and restricted access to Personal Information and Sensitive Data processed by Human Resources or its authorized third party contractor(s). All inquiries from outside Situs, either written or verbal, concerning the identity, employment record, or performance of an Applicant shall be referred, without exception, to the Human Resources Department for handling. If the request is from a government agency, a Situs Human Resources representative and/or an attorney in the Situs Legal Department will verify the credentials of the agency representative before releasing information about an Applicant.

DISPUTE RESOLUTION

If an Applicant living in a European Union member country has a complaint regarding the transfer of Human Resources data to or from the United States, Situs agrees to cooperate with the appropriate European Union protection authority for handling such complaints. Situs agrees to handle all other disputes involving the transfer of Personal Information or Sensitive Data from any other country to or from the United States in accordance with applicable local law dispute resolution procedures, if any. Except as provided above, dispute resolution for all other individuals shall be in accordance with applicable law.

VERIFICATION

Situs will review and update this Privacy Policy periodically. Situs engages in periodic self assessment to verify that it continues to be in compliance with this Privacy Policy and applicable law.



CONTACT INFORMATION

If you have any questions regarding this Privacy Policy, believe that the privacy of your Personal Information or Sensitive Data has not been respected, want to register a complaint, or submit an access request, you may contact Situs's Director of Global Human Resources, Angela Hitzman at angela.hitzman@situs.com. Written inquiries may be addressed to Angela Hitzman, Director Global Human Resources, The Situs Group of Companies. 4665 Southwest Freeway, Houston, Texas 77027. USA.



