

Privacy Statement

Management Controls, Inc. respects the privacy of all customers and website visitors. In that regard, we have established this Privacy Policy, in compliance with EU-U.S. Privacy Shield Framework provisions, as a commitment to maintain the privacy of your personal information in connection with all of your online interactions with us.

Use of Personal Information

Management Controls may gather information about you in the following ways:

- We may collect and store personally identifiable information such as name, telephone numbers, physical and e-mail addresses, etc. that you provide to us for the purposes of facilitating your use of the Management Controls site and services, billing, handling correspondence with you, and registering your credentials for site access entitlements.
- We may collect and store information about your visits and interactions with our site and services in collective or aggregated data that does not identify you specifically, but is automatically received and recorded by us through the use of “cookies.” A cookie may be used by our web site to communicate state information to and from your browser and the website. The state information can be used for session identification, user preferences, or anything else that can be accomplished through storing text data associated with providing our services.
- While Management Controls does not intend to collect personal information beyond the most basic user identification data elements mentioned previously, the data being collected by our products and services could contain personally identifiable information that is more sensitive in nature. Please be aware that this Privacy Statement and the choices you make on this web site and within our services will not necessarily apply to personal information you may have provided to us in the context of other, separately operated, Management Controls products or services. The security of that data is warranted by Management Controls as described in your contract and Master Service Agreement and is verified annually through both internal and external audit activities.

We use your site-related information to help maintain accurate accounts, to provide and to change services, to provide accurate billing and shipping, to answer your product and service inquiries, to market services and products, and to ensure that our web site is useful to you. Management Controls does not market to or collect personal information about children under 13 years of age via any site, product, or service.

Sharing Information

The information that we obtain from you is necessary for us to provide your services. As a general rule, Management Controls will not sell, trade, or disclose to third parties personal information gathered

online about you without your consent. The only exception to this rule is as may be required by subpoena, search warrant, or other legal process or in the case of imminent physical harm to you or others. To update any of your personal information or to change any of your marketing preferences, you may contact us at privacy@mccorp.com.

EU-U.S. Privacy Shield

Management Controls, Inc. complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. Management Controls, Inc. has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>

As a part of Management Controls, Inc. conformation to the EU-U.S. Privacy Shield Framework, the following items are applicable:

- Management Controls, Inc. is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).
- There is a possibility, under certain conditions, for an individual to invoke binding arbitration to resolve matters.
- Management Controls, Inc. is required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.
- Management Control, Inc.'s liability transfers onward to third parties contracted by Management Controls, Inc.

E-mail Communication

We and our affiliated businesses, partners, and agents may use e-mail to communicate to our customers, respond to visitor e-mails, or to inform you about events or new products. We will not send commercial solicitation via e-mail to you if you request that it not be sent.

Choice

You may choose to “opt out” of (a) any third-party sharing of personal information by Management Controls (except pursuant to the “Sharing Information” section above) or email communication as permitted above or (b) Management Control’s use of personal information you feel is incompatible with the purpose(s) for which it was originally collected or authorized by you. If you wish to “opt out”, you

can contact Management Controls with your request via email at privacy@mccorp.com or via mail at 15600 JFK Blvd, Suite 850, Houston, TX 77032 Attn: Compliance.

Recourse Mechanism

In compliance with the Privacy Shield Principles, Management Controls, Inc. commits to resolve complaints about our collection or use of your personal information. Individuals in the European Union with inquiries or complaints regarding our Privacy Shield policy should first contact Management Controls, Inc. at:

Management Controls, Inc.
15600 JFK Blvd, Suite 850
Houston, TX 77032
Attn: Compliance

Management Controls, Inc. has further committed to refer unresolved Privacy Shield complaints to ICDR/AAA, an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please contact or visit <http://info.adr.org/safeharbor> for more information or to file a complaint. The services of ICDR/AAA are provided at no cost to you.

If you wish to obtain a copy of the personal information collected by Management Controls or to correct, amend, or delete certain personal information collected by Management Controls, you can contact Management Controls with your request via email at privacy@mccorp.com or via mail at 15600 JFK Blvd, Suite 850, Houston, TX 77032 Attn: Compliance.

Security

Management Controls utilizes generally accepted industry practices and standards in order to protect the personal information provided to or collected by us.

Modifications/Enforcement

Management Controls reserves the right to modify this Privacy Policy from time to time without notice and at Management Controls' sole discretion. Such modifications shall be effective when posted. If you have any inquiries or concerns regarding Management Controls' privacy policy or its compliance with this privacy policy, please contact Management Controls via email at privacy@mccorp.com or via mail at 15600 JFK Blvd, Suite 850, Houston, TX 77032 Attn: Compliance. If you believe that Management Controls has operated in a manner inconsistent with or in violation of this Privacy Policy, please contact us immediately, via email at privacy@mccorp.com or via mail at 15600 JFK Blvd, Suite 850, Houston, TX 77032 Attn: Compliance, to remedy the inconsistency or problem. If the inconsistency or problem is not

remedied by Management Controls to your satisfaction, please contact the American Arbitration Association at www.adr.org for an independent review and resolution of the issue.

Contacting the Company

For questions or comments regarding this Privacy Policy, please contact us at:

Management Controls, Inc.
15600 JFK Blvd, Suite 850
Houston, TX 77032
privacy@mccorp.com