

Effective Date: June 15, 2012

Fragomen Privacy Policy and Notice

Fragomen, Del Rey, Bernsen & Loewy, LLP, Fragomen Global LLP, and their related affiliates and subsidiaries (collectively, “**Fragomen**”) understand that its clients are concerned about maintaining the privacy and security of the personal information that Fragomen receives and processes on their behalf, and would like such processing to be open and transparent to its clients and their employees.

Accordingly, this Privacy Policy and Notice (“**Privacy Notice**”) is intended to inform you about Fragomen’s online and offline privacy practices and describes the types of personal information we collect, how we may use that information and with whom we may share it in relation to the client services we provide.

This Privacy Notice also describes the measures we take to protect the security of the information that we receive and process relating to you.

In addition, we provide information on how to contact us: (1) to access, correct, or delete your personal information; (2) to exercise choice regarding the processing of your personal information in accordance with applicable laws; and (3) to ask any questions you may have about our privacy practices. You may, if you prefer, address any concerns directly to your employer, in those cases where we process your personal information when engaged to do so by corporations or other business groups. Where we refer to “employer” below, it is in these circumstances where corporations or other business groups have engaged us to act.

Information We Collect and How We Use It

Personal Information We Collect About You

For purposes of providing immigration consulting and legal services, Fragomen may collect certain personal information about you and, if required, your family members and employer. In certain circumstances, we may not be able to provide you with the immigration consulting or legal services requested by your current or prospective employer (or you, if our services are rendered under a personal written engagement between you and Fragomen) if we are not provided with all relevant personal information. We set forth below the ways in which information may be provided to us and the types of information that may be necessary for immigration services and visa processing. We also tell you the purposes for which we may use the information that we receive.

Client Services

For purposes of providing client services, Fragomen may collect and process personal information such as your name, address, telephone number, date of birth, marital status,

passport number, employment history, educational background, tax status, employee number, job title and function, and expatriate status.

We may obtain the personal information from a number of sources, such as online questionnaires and forms you complete. In addition, we may obtain personal information from third-party sources, such as former employers, educational institutions you attended and your current or prospective employer. We use this information to provide immigration consulting and legal services, such as: (1) analyzing, completing and processing immigration, visa and related filings and submissions to relevant government agencies; (2) assisting with relocation and other expatriate issues; and (3) providing access to online case-management tools, where applicable.

Pre-employment Verification

Certain countries may require verification of new employees' employment eligibility at the time of hire. Examples of such requirements include the Immigration Reform and Control Act of 1986 ("IRCA") in the United States and the Immigration, Asylum & Nationality Act 2006 in the United Kingdom, pursuant to which Fragomen may collect and process personal information such as your name, email address, home address, military service and citizenship status.

Information Requests

If you request information about our services, you may choose to provide personal information such as your name, address, email address and telephone number. We use your information to respond to your request.

Other Uses of Information

We may use personal information we collect for other purposes, such as client and Fragomen administration, data analytics, and compliance with applicable laws and Fragomen policies and procedures.

Sensitive Personal Data

Certain categories of personal information may be considered "sensitive" and are subject to a higher level of data protection. These categories may include race or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, sex life or sexual orientation, physical or mental health or condition, and data relating to offenses, and/or criminal convictions.

In the context of the services we provide, Fragomen may collect sensitive personal data in limited circumstances, for example when such data are necessary to comply with the legal obligations of the country in which you are seeking a visa or work permit. For instance, we may need to ask whether you have been previously convicted of any criminal offenses or other personal matters when the local applicable immigration laws would require such data in an application.

Information We Collect by Automated Means

We may collect certain information by automated means for our own purposes when you visit our websites or web-based interfaces (e.g., employer-specific IHP, the BUSINESS VISA MATRIX™), such as how many users visited our sites and the pages accessed. By collecting this information, we learn how to best tailor our websites to our visitors. We collect this information through “cookies” and IP addresses.

Cookies

Like many organizations, we may use “cookies” on our websites. Cookies are bits of text that are placed on your computer’s hard drive when you visit certain websites. We may use cookies to tell us, for example, whether you have visited us before or if you are a new visitor and to help us identify site features in which you may have the greatest interest. Cookies may enhance your online experience by saving your preferences while you are visiting a particular site.

Most browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to disable existing cookies. Please note, however, that without cookies, you may not be able to take advantage of all our website features.

Log files, usage data and IP addresses

Log files are web server files (containing information such as domain name or IP address, URL, http response code, or the date and duration of your visit) that are automatically created when an Internet user visits a website. An IP address is a unique identifier that certain electronic devices use to identify and communicate with each other on the Internet. When you visit our website, our servers log your IP address. In combination with other data, this information helps us understand which features are of interest to our visitors and the regions of the world where these visitors are located. In addition, log files help detect disruptions that may interfere with the provision of our website.

Information We Share

We do not disclose information except as described in this Privacy Notice. We will not sell, share, transfer, rent, use, or distribute your information for purposes other than those disclosed here unless required by law or as authorized by you or your employer. We may share the information you provide among our subsidiaries, affiliates and your employer or a third party as your employer instructs us, as appropriate or necessary in connection with the services. In addition, as part of the immigration consulting and legal services we have been directed to provide, Fragomen may disclose personal information to government agencies, your former, current, or prospective employer and its related entities. We may also share the information with certain service providers we have retained in connection with the services we provide, such as translators, education evaluation services, couriers, or other necessary entities. We take steps to require that service providers protect the information consistently with this Privacy Notice. These service providers are

authorized to use the information only as necessary to perform services on our behalf or to comply with law or legal process. Where we have knowledge that a service provider processes your personal information in a manner contrary to this Privacy Notice, we will take reasonable steps to prevent or stop the processing. In addition, we may disclose information about you: (1) if we are required to do so by law or legal process, (2) to law enforcement authorities or other government officials, (3) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss in connection with an investigation of suspected or actual illegal activity; or (4) if this is necessary to protect the vital interests of any person.

How We Protect Personal Information

We seek to ensure that any personal information that we hold about you is accurate, complete, current and otherwise reliable based on data you or an employer provide in order to provide the immigration consulting and legal services. We seek to collect personal information that is adequate, relevant and not excessive for these purposes.

We maintain appropriate administrative, technical, and physical safeguards to protect against loss, misuse or unauthorized access, disclosure, alteration, or destruction of personal information.

We educate our employees and strive to maintain appropriate standards of conduct with regard to the protection of personal information.

We take steps to require that third parties who assist in our provision of services abide by all applicable privacy and data protection laws and prohibit them from using your information other than in connection with the services they have been engaged to provide.

Information We Transfer

To provide immigration consulting and legal services, we may transfer the personal information we collect to several countries, such as the United States or any other country in which Fragomen or its affiliates, subsidiaries, or service providers maintain facilities, which may not provide the same level of data protection as the laws in the country in which you reside. When we transfer your information to other countries, we will use, share and safeguard that information as described in this Privacy Notice.

Your Choices and Rights

As set out above, Fragomen may collect certain information about you for purposes of providing immigration consulting and legal services. In the unlikely event that Fragomen wishes to use this information in a way that is incompatible with these purposes, we will notify, as applicable, either your employer on whose behalf we process your information or you if you have engaged Fragomen directly. We will respect your decision if subsequently your employer informs us or, where we notify you directly, you inform us that you wish to opt-out of personal information about you being

processed for the new purpose. If sensitive personal information is involved we will only use your information for the new purpose if you actively communicate your consent to this processing to your employer or us, as applicable, in accordance with the requirements of applicable laws. We will follow the identical procedure if we disclose personal information to third parties that are expected to process the personal information for their own independent purposes.

We also will assist our clients to provide you or provide you directly, as applicable, with reasonable access to your personal information and, where appropriate, with the ability to review and correct inaccuracies. We will use reasonable efforts to assist your employer respond to an access request or, where required under law, to respond directly to a valid access request within a reasonable period of time. To help protect your privacy and provide security, Fragomen takes reasonable steps to verify your identity before granting access to information. To exercise these rights, please contact your employer or Fragomen, as applicable.

Updates to our Privacy Notice

This Privacy Notice may be updated periodically without prior notice to you to reflect changes in our information practices. We will post a notice on our applicable websites or materials to advise of any significant changes to our Privacy Notice and indicate in the notice when it was most recently updated. While this Privacy Notice is designed to comply with the most stringent data privacy laws and represents “best practices,” in certain countries additional or different procedures not inconsistent with this Privacy Notice may apply as necessary to satisfy local legal requirements.

How to Contact Us

If you have any questions or comments about this Privacy Notice, please contact us by email at **dataprivacy@fragomen.com**. You also may write to us at:

Attn: Office of General Counsel
Fragomen, Del Rey, Bernsen & Loewy, LLP
90 Matawan Road
P.O. Box 2001
Matawan, New Jersey 07747
USA

Please print this document and sign the consent form on the next page and return the signed copy to your primary Fragomen contact.

Fragomen Privacy Policy and Notice - Consent Form

By signing below, you will be giving your consent to our processing your personal data as described in our Privacy Policy and Notice. If it is necessary to process sensitive personal data (as described in the “Sensitive Personal Data” section of the Policy) as part of the specific immigration services being provided (which is specially protected under data protection laws of certain countries), you consent to such processing. Where necessary, you also consent to our sharing this data outside of your home country with government agencies, your current or prospective employer and its related entities and certain third-party service providers, as described in the “Information We Share” section of the Policy.

Print Full Legal Name: _____

Signature: _____

Date (DD/MM/YYYY): _____