



# Hill International

Policy Title: **Global Privacy Policy**

Effective Date: **September 23, 2016**

Revised: **March 1, 2018**

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## 1.0 OVERVIEW

### 1.1 PURPOSE

Hill International, Inc. and its operating divisions, subsidiaries, affiliates and branches (collectively, “Hill,” the “Company,” “we” or “us”) are sensitive to privacy issues, and it is important to us to protect the information provided to us by our Clients, Suppliers, and potential, current and former Employees. Accordingly, Hill provides this privacy and information practices policy to inform you about our information practices, the kinds of information we may collect, how we intend to use and share that information, and how you can correct or change such information (“Privacy Policy”). We encourage you to read this Privacy Policy in its entirety before submitting any information. By using Hill’s websites, submitting or requesting information, you acknowledge that you understand and agree with the provisions of this Privacy Policy.

### 1.2 SCOPE

This Privacy Policy applies to Personal Data that is Processed by Hill in the course of our business, including on Hill’s website located at [www.hillintl.com](http://www.hillintl.com) (together with any and all future websites operated by or on behalf of Hill, the “Sites”). All individuals whose responsibilities include the Processing of Personal Data on behalf of Hill are expected to protect that data by adherence to this Privacy Policy. This Privacy Policy is intended to meet requirements globally, including those in North America, Europe, APAC, and other jurisdictions.

Hill complies with the requirements of the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework, as set forth by the U.S. Department of Commerce and the Federal Trade Commission (“FTC”), regarding the collection, use and retention of Personal Data from the European Economic Area and Switzerland to the United States, respectively (collectively “Privacy Shield”). Hill has certified to the Department of Commerce that it adheres to the Privacy Shield Principles and Supplemental 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 Hill’s certification, please [visit https://](https://)

[www.privacyshield.gov](http://www.privacyshield.gov). Additionally, Hill may endeavor to protect your data through other legally valid methods, including international data transfer agreements.

This Privacy Policy applies to all Hill operating divisions, subsidiaries, affiliates and branches; including its U.S. affiliates certified under Privacy Shield (Hill International, Inc.; Hill/ASL Joint Venture (JV Company); Hill International-APSI Construction Management, a Joint Venture, LLC (JV Company); Hill International (New England), Inc. (p/k/a Collaborative Partners, Inc.); Hill International (Puerto Rico), Inc.; Hill International Development Inc.; Hill International Real Estate, LLC; Hill International Real Estate Partners, LP (JV Company); TCM Group; Trident Development Enterprise, LLC (JV Company); Legacy JV- Hill/AECOM; CCTF Project Controls Specialists LLC (JV Company) and any additional U.S. subsidiary, affiliate or branch of Hill that we may subsequently form. This Global Privacy Policy is designed to satisfy global and local compliance requirements; however, Hill may also maintain additional privacy policies and notices to address or provide additional details regarding certain additional local requirements.

## **2.0 TRANSPARENCY/NOTICE-WHAT PERSONAL DATA WE COLLECT AND HOW WE USE IT**

The types of Personal Data we may collect (directly from you or from Third Party sources) and our privacy practices depend on the nature of the relationship you have with Hill and the requirements of applicable law. We endeavor to collect information only relevant for lawful purposes of Processing. When we collect Personal Data from you, it may be (i) to fulfill a contract; (ii) to fulfill compliance obligations; (iii) to protect your or another individual's vital interests; (iv) to perform a task in the public interest; or (v) for purposes of our or a Third Party's legitimate interests, or other legal bases as permitted by law. Below are some of the ways we collect information and how we use it.

### **2.1 Clients**

Hill collects Personal Data regarding its current, prospective and former clients, customers, visitors and guests (collectively "Clients"). Client data we collect includes information relating to the sale or support of Hill International, Inc.'s Project Management and Construction Management Services, including title, name, address, phone number, email address, government identification (driver's license, passport), and financial information related to payments for services or goods. Additionally, where permitted, we may collect location information regarding our Client's workers, including through GPS tracking technology on Company-owned vehicles, tools or other devices.

We acquire, hold, use and Process Personal Data about Clients for a variety of business purposes including to:

- generally manage Client information and accounts;
- provide Hill International, Inc.'s Project Management and Construction Management Services;
- respond to questions and requests;
- provide access to certain areas and features of the Hill Sites;

- verify Client identity;
- communicate about Client account and activities on Hill’s Sites and systems, and, in Hill’s discretion, changes to any Hill policy;
- tailor content, advertisements, and offers we serve to Clients;
- process payment for products or services purchased;
- improve Hill websites and systems;
- develop new products, processes and services;
- enhance Client worker safety and/or performance using location-based technologies, tools and/or devices;
- process applications and transactions; and
- for purposes disclosed at the time that Clients provide Personal Data or otherwise with consent.

## **2.2 Suppliers**

Hill collects Personal Data regarding its current, prospective and former suppliers, distributors, subcontractors and strategic partners (collectively “Suppliers”). Supplier information we collect relates to the management of Suppliers and the receipt of their products and services. It may include title, name, address, phone number, email address, government identification (driver’s license, passport), and financial information related to payment for goods and services.

We acquire, hold, use and Process Personal Data about Suppliers for a variety of business purposes including to:

- generally manage Supplier information and accounts;
- provide Hill International, Inc.’s Project Management and Construction Management Services;
- respond to questions and requests;
- provide access to certain areas and features of our Sites;
- verify Supplier identity;
- communicate about Supplier account and activities on our Sites and systems, and, in Hill’s discretion, changes to any Hill policy;
- tailor content;
- process payment for products or services purchased by Hill;

- improve Hill Sites and systems;
- develop new products, processes and services;
- process applications and transactions; and
- for purposes disclosed at the time Suppliers provide Personal Data or otherwise with consent.

### **2.3 Human Resources (“HR”) Data**

Hill collects Personal Data from current, prospective and former Employees, their contact points in case of a medical emergency, and beneficiaries under any insurance policy (“HR Data”). HR Data we collect may include title, name, address, phone number, email address, date of birth, passport number, driver’s license number, social security number, financial information related to credit checks, bank details for payroll, information that may be recorded on a CV or application form, or in Hill’s applicant tracking system, contact information of Third Parties in case of an emergency, and beneficiaries under any insurance policy. Additionally, we may collect location information regarding our Employees, including through GPS tracking technology on Company-owned vehicles, tools or other devices. We may also collect Sensitive HR Data such as details of health and disability, including mental health, medical leave, and maternity leave, as well as information relating to trade union membership.

We acquire, hold, use and Process HR-related Personal Data for a variety of business purposes including:

- workflow management, assigning, managing and administering projects;
- HR administration and communication;
- payroll and the provision of benefits;
- compensation, including bonuses and long term incentive administration, stock plan administration, compensation analysis, including monitoring overtime and compliance with labor laws, and company recognition programs;
- job grading activities;
- performance and Employee development management;
- organizational development and succession planning;
- benefits and personnel administration;
- absence management;
- helpdesk and IT support services;
- regulatory compliance;

- internal and/or external or governmental compliance investigations;
- internal or external audits;
- litigation evaluation, prosecution and defense;
- diversity and inclusion initiatives;
- shareholder management;
- restructuring and relocation;
- emergency contacts and services;
- Employee safety, including monitoring compliance with safety regulations by confirming Employees are not speeding or otherwise violating traffic laws;
- compliance with statutory requirements;
- processing of Employee expenses and travel charges;
- sales and marketing collateral and other related purposes;
- acquisitions, divestitures and integrations; and
- monitoring the status of employment applications through our applicant tracking system.

#### **2.4 Social Media and Interest-Based Advertising**

Generally, online social media resources are interactive tools that enable Data Subjects to collaborate and share information with others. Social media resources include, but are not limited to, social networks, discussion boards, bulletin boards, blogs, wikis, and referral functions to share web site content and tools with a friend or colleague. Hill may collect Personal Data to enable Data Subjects to use online social media resources. We may also enable you to use these social media resources to post or share Personal Data with others. When using social media resources, you should take into careful consideration what Personal Data they share with others. Hill will comply with the terms of this Privacy Policy and the privacy policies applicable to the social media resources it uses.

#### **2.5 Information from Third Party Sources**

Hill may collect information about you from Third Party sources to supplement information provided by you. This supplemental information allows us to verify information that you have provided to Hill and to enhance our ability to provide you with information about our business, products and services. Hill's agreements with these Third Party-sources typically limit how the Company may use this supplemental information.

#### **2.6 Direct Mail, Email and Outbound Telemarketing**

Clients and Suppliers who provide us with Personal Data, or whose Personal Data we obtain from Third Parties, may receive periodic emails, mailings or phone calls from us with information on our

products and services or upcoming special offers/events we believe may be of interest. We offer our Clients and Suppliers the option to object at any time by opting out of any such direct marketing communications at no cost to the individual Client or Supplier.

## **2.7 Research/Survey Solicitations**

From time to time, Hill may perform research (online and offline) via surveys. We may engage Third Party service providers to conduct such surveys on our behalf. All survey responses are voluntary, and the information collected will be used for research and reporting purposes to help us to better serve Clients and Suppliers by learning more about their needs and the quality of the products and services we provide. The survey responses may be utilized to determine the effectiveness of our Sites, various types of communications, advertising campaigns and/or promotional activities. If a Client or Supplier participates in a survey, the information given will be used along with that of other study participants. We may share anonymous individual and aggregate data for research and analysis purposes.

## **2.8 All Internet Users - Cookies, Pixel Tags, Web Beacons and Aggregate Information**

### **2.8.1 Cookies**

Hill does not currently use cookie technology, but may in the future. Like many other websites, Hill may employ a cookie, or small piece of computer code that enables Web servers to “identify” visitors, each time an individual initiates a session on the Company’s Sites. A cookie is set in order to identify Data Subjects and tailor our Sites to you. Cookies do not store any of the Personal Data that is provided to the Hill Sites; they are simply identifiers. Data Subjects have the ability to delete cookie files from their own hard drive at any time. However, individuals should be advised that cookies may be necessary to provide access to much of the content and many of the features of Hill’s Sites.

### **2.8.2 Pixel Tags/Web Beacons**

Hill may use “pixel tags,” also known as “web beacons,” which are small graphic files that allow us to monitor the use of our Sites. A pixel tag can collect information such as the Internet Protocol (“IP”) address of the computer that downloaded the page on which the tag appears; the URL of the page on which the pixel tag appears; the time the page containing the pixel tag was viewed; the type of browser that fetched the pixel tag; and the identification number of any cookie on the computer previously placed by that server. When corresponding with you via HTML capable email, we may use “format sensing” technology, which allows pixel tags to let us know whether you received and opened our email.

### **2.8.3 Anonymous and Aggregated Information**

Anonymized and aggregated information is used for a variety of functions, including the measurement of visitors’ interest in and use of various portions or features of the Sites. Anonymized or aggregated information is not Personal Data, and Hill may use such information in a number of ways, including internal analysis, analytics and research. We may share this information with Third Parties for our or their purposes in an anonymized or aggregated form that is designed to prevent anyone from identifying you.

## **2.9 Mobile Computing**

Hill may provide websites and online resources that are specifically designed to be compatible and used on mobile computing devices. Mobile versions of Hill’s Sites may require that users log in with an account. In such cases, information about use of each mobile version of the website may be associated with user accounts. In addition, Hill may enable individuals to download an application, widget or other tool that can be used on mobile or other computing devices. Some of these tools may store information on mobile or other devices. These tools may transmit Personal Data to Hill to enable Data Subjects to access user accounts and to enable Hill to track use of these tools. Some of these tools may enable users to e-mail reports and other information from the tool. Hill may use personal or non-identifiable information transmitted to the Company to enhance these tools, to develop new tools, for quality improvement and as otherwise described in this Privacy Policy or in other notices Hill provides.

## **2.10 Automated Processing and Profiling**

While we currently do not participate in this practice, in the future, we may participate in profiling, using automated Processing of Personal Data for the purpose of making a decision. Profiling may be used to help us make decisions about your eligibility for employment or other business-related opportunities. In such cases, if and as applicable, and to the extent required by applicable law, we will endeavor to implement suitable safeguards, including, for example, an opportunity for you to request human intervention, express your point of view, contest any decisions made and request restriction of Processing.

Profiling-based decisions will not be based on special categories of Personal Data (e.g. racial, ethnic, or religious information) unless (a) the Data Subject has given explicit consent to the Processing of those Personal Data for one or more specified purposes, except where prohibited by law; or (b) Processing is necessary based upon a legal public interest.

Data Subjects have the right to avoid being subject to a decision based solely on automated Processing, including profiling, which has legal consequences to the Data Subject. The decision based on automated Processing may nonetheless be made provided it is (a) necessary for entering into, or performance of, a contract between Hill and the Data Subject; (b) authorized by law to which Hill is subject to and which also lays down suitable measures to safeguard the Data Subject's rights and freedoms and legitimate interests; or (c) based on the Data Subject's explicit consent.

## **3.0 CHOICE/MODALITIES TO OPT OUT**

You have the right to opt out of certain uses and disclosures of your Personal Data, as set out in this Privacy Policy.

### **3.1 General**

Where you have consented to Hill’s Processing of your Personal Data or Sensitive Personal Information (“Sensitive Data”), you may withdraw that consent at any time and opt out. Additionally, before we use Personal Data for any new purpose not originally authorized by you, we will provide information regarding the new purpose and give you the opportunity to opt out.

Prior to disclosing Sensitive Data to a Third Party or Processing Sensitive Data for a purpose other than its original purpose or the purpose authorized subsequently by the Data Subject, Hill will

endeavor to obtain each Data Subject’s explicit consent (opt-in). Where consent of the Data Subject for the Processing of Personal Data is otherwise required by law or contract, Hill will comply with the law or contract.

### **3.2 Email and Telephone Communications**

An “Unsubscribe” button will be provided at the top or bottom of marketing-related email communications sent by Hill so that you can opt-out. However, we will continue to send transaction-related emails regarding products or services you have requested.

### **3.3 HR Data**

With regard to Personal Data that Hill receives in connection with the employment relationship, Hill will use such Personal Data only for employment-related purposes (e.g., tax, payroll, benefits), as more fully described in Section 2.3 above. If Hill intends to use this Personal Data for any other purpose, Hill will provide the Data Subject with an opportunity to opt-out of such uses (e.g., charity, health club membership).

### **3.4 Automated Processing and Profiling**

When data is collected, Hill will inform the Data Subject that profiling will occur, and also the reasoning and anticipated consequences of such Processing. The Data Subject may request at any time that Hill provide confirmation of any Processing, including profiling and its consequences. The Data Subject has the right to object to profiling at any time; the Processing must cease unless Hill has a legal basis that overrides the interests, rights and freedoms of the Data Subject.

### **3.5 “Do Not Track”**

Hill does not collect personally identifiable information (“PII”) about individual users’ online activities over time and across different web sites or online services and, therefore, does not respond to Do Not Track (“DNT”) signals. Hill does not knowingly authorize Third Parties to collect PII about individual users’ online activities over time and across different web sites or online services.

## **4.0 ONWARD TRANSFER**

As set out in this Privacy Policy, Hill may share Personal Data with our service providers, consultants and affiliates to provide you with a product or service that you have requested or for our and our affiliates’ internal business purposes. Vendors on the HR side include, but are not limited to, providers of applicant recruitment, evaluation and management services, payroll services, insurance and other employee-related benefits, facilities management, security, travel services, and cellular service. Vendors on the commercial side include, but are not limited to, providers of insurance, security, and facilities management.

### **4.1 Information We Share**

Hill does not sell or otherwise disclose Personal Data about you, except as described in this Privacy Policy or as you explicitly consent. Payment information will be used and shared only to effectuate your order and may be stored by a service provider for purposes of future orders. Hill requires our service providers to agree in writing to maintain the confidentiality and security of Personal Data they maintain on our behalf and not to use it for any purpose other than the purpose for which Hill

retained them. With respect to onward transfers to Agents under Privacy Shield, Privacy Shield requires that Hill remain liable should its Agents Process Personal Data in a manner inconsistent with the Privacy Shield Principles.

We may disclose information about you: (i) if we are required to do so by law, court order or legal process; (ii) in response to lawful requests by public authorities, including to meet national security or law enforcement requirements; (iii) under the discovery process in litigation; (iv) to enforce Hill policies or contracts; (v) to collect amounts owed to Hill; (vi) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation or prosecution of suspected or actual illegal activity; or (vii) in the good faith belief that disclosure is otherwise necessary or advisable. In addition, from time to time, server logs may be reviewed for security purposes - e.g., to detect unauthorized activity on the Sites. In such cases, server log data containing IP addresses may be shared with law enforcement bodies in order that they may identify users in connection with their investigation of the unauthorized activities.

We reserve the right to disclose or transfer any information we have about you in the event of a proposed or actual purchase, any reorganization, sale, lease, merger, joint venture, assignment, amalgamation or any other type of acquisition, disposal or financing of all or any portion of our business or of any of the business assets or shares (including in connection with any bankruptcy or similar proceeding). Should such an event occur, Hill will endeavor to direct the transferee to use Personal Data in a manner that is consistent with this Privacy Policy.

## **4.2 Data Transfers**

All Personal Data sent or collected by Hill may be stored anywhere in the world, including but not limited to, in the United States, on the cloud, our servers, the servers of our affiliates or the servers of our service providers. By providing information to Hill, you consent to the storage of your Personal Data in these locations, which may have privacy protections less stringent than your jurisdiction.

## **5.0 RIGHTS OF ACCESS, RECTIFICATION, ERASURE AND RESTRICTION**

Under Privacy Shield, you may seek confirmation regarding whether Hill is Processing Personal Data about you, request access to Personal Data, and ask that we correct, amend or delete that information where it is inaccurate or has been Processed in violation of the Privacy Shield Principles. Where otherwise permitted by applicable law, you may use any of the methods set out in Section 8 of this Privacy Policy to (i) request confirmation of Processing; (ii) seek access to; (iii) receive (port), including to another controller; (iv) restrict or object to Processing; (v) seek rectification; or (vi) request erasure of Personal Data held about you by Hill. Such requests will be processed in line with local laws, including without undue delay and in accordance with any required time frames. Although Hill makes good faith efforts to provide individuals with access to their Personal Data, there may be circumstances in which Hill is unable to provide access, including but not limited to: where the information contains legal privilege, would compromise others' privacy or other legitimate rights, where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy in the case in question or where it is commercially proprietary. If Hill determines that access should be restricted in any particular instance, we will endeavor to provide you with an explanation of why that determination has been made within any required time frames (approximately one month), a contact point for any further inquiries and any other legally required

information. To protect your privacy, Hill will take commercially reasonable steps to verify your identity before granting access to or making any changes to your Personal Data.

## **6.0 RETENTION**

Hill retains the Personal Data we receive as described in this Privacy Policy based on the following criteria. We will retain Personal Data for as long as you use our Sites or as necessary to fulfill the purpose(s) for which it was collected, provide our products and services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, or based upon such other criteria required to comply with contracts and applicable laws.

## **7.0 SECURITY**

The security of all Personal Data provided to Hill is important to us, and Hill takes reasonable steps designed to protect your Personal Data, including against unauthorized or unlawful Processing and against accidental loss, destruction or damage, endeavoring to use appropriate technical or organizational measures. Unfortunately, no data transmission over the Internet or storage of information can be guaranteed to be 100% secure. As a result, while Hill strives to protect your Personal Data, we cannot ensure or warrant the security of any information you transmit to Hill, and you do so at your own risk.

## **8.0 REDRESS / COMPLIANCE AND ACCOUNTABILITY**

If after reviewing this Privacy Policy, you would like to submit a request or you have any questions or privacy concerns, please contact:

Hill International, Inc. Attn: Privacy Officer  
One Commerce Square  
2005 Market Street, 17th Floor  
Philadelphia, PA 19103  
[privacyofficer@hillintl.com](mailto:privacyofficer@hillintl.com)

Hill will address your concerns and attempt to resolve any privacy issues in a timely manner. If you are an EU or Swiss citizen and feel that Hill is not abiding by the terms of this Statement, or is not in compliance with the Privacy Shield Principles, please contact Hill at the contact information provided above. In addition, Hill has agreed to cooperate with JAMS Privacy Shield Dispute Resolution Program with respect to complaints related to EU and Swiss Client and Supplier data and, with respect to Employee and HR data, comply with the advice given by the panel established by local data protection authorities for EU citizens and with the Swiss Federal Data Protection and Information Commissioner's authority and advice for such data of Swiss citizens. For more information and to submit a complaint to JAMS, a dispute resolutions provider which has locations in the United States and the EU, visit <https://www.jamsadr.com/file-an-eu-us-privacy-shield-or-safe-harbor-claim>. Such independent dispute resolution mechanisms are available to EU and Swiss citizens free of charge. If any request remains unresolved (whether related to Privacy Shield or otherwise), you may contact the national data protection authority for your EU Member State, and may have a right to invoke binding arbitration under Privacy Shield; for additional information, see <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>. The FTC has jurisdiction over Hill's compliance with the Privacy Shield.

## **9.0 OTHER RIGHTS AND IMPORTANT INFORMATION**

## **9.1 Information Regarding Children**

Due to the nature of Hill’s business, services and benefits are not marketed to minors. Hill does not knowingly solicit or collect Personal Data from children under the age of 13, except in Brazil, in accordance with or as required by local law (e.g., for our Employees’ children – birth certificate, dependent declarations, day care center data, school attendance information, identification cards and other data for tax, benefits or other necessary purposes). If we learn that we have collected other Personal Data from a child under the age of 13 (or 16 with respect to EU citizens, unless an EEA member state shall otherwise specify), we will endeavor to promptly delete that information.

## **9.2 California Privacy Rights**

California law permits users who are California residents to request and obtain from us once a year, free of charge, a list of the Third Parties to whom we have disclosed their Personal Data (if any) for their direct marketing purposes in the prior calendar year, as well as the type of Personal Data disclosed to those parties. Hill does not share Personal Data with Third Parties for their own marketing purposes.

## **9.3 Links to Third Party Websites**

Please note that our Sites may contain links to other websites for your convenience and information. Hill does not control Third Party websites or their privacy practices, which may differ from those set out in this Privacy Policy. Hill does not endorse or make any representations about Third Party websites. Any Personal Data you choose to give to unrelated Third Parties is not covered by this Privacy Policy. Hill encourages you to review the privacy policy of any company or website before submitting your Personal Data. Some Third Parties may choose to share their users’ Personal Data with Hill; that sharing is governed by that company’s privacy policy, not this Privacy Policy.

## **9.4 Changes to the Privacy Policy**

Hill may update this Privacy Policy from time to time as it deems necessary in its sole discretion. If there are any material changes to this Privacy Policy, Hill will notify you by email or as otherwise required by applicable law. Hill encourages you to review this Privacy Policy periodically to be informed regarding how Hill is using and protecting your information and to be aware of any policy changes. Your continued relationship with Hill after the posting or notice of any amended Privacy Policy shall constitute your agreement to be bound by any such changes. Any changes to this Privacy Policy take effect immediately after being posted or otherwise provided by Hill.

## **9.5 Compliance**

This Privacy Policy shall be implemented by Hill and all its operating divisions, subsidiaries and affiliates. Hill has put in place mechanisms to verify ongoing compliance with Privacy Shield Principles and this Privacy Policy. Any Employee that violates these privacy principles will be subject to disciplinary procedures.

## **10.0 DEFINITIONS**

“Agent” means any Third Party that processes Personal Data pursuant to the instructions of, and solely for, Hill or to which Hill discloses Personal Data for use on its behalf.

“Data Subject” is an identified or identifiable natural person.

“Employee” refers to any current, temporary, permanent, prospective or former employee, director, contractor, consultant, worker or retiree of Hill or its subsidiaries worldwide.

“Personal Data” is any information relating to an identified or identifiable natural person (“Data Subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

“Privacy Shield Principles” collectively means the seven (7) privacy principles as described in the Privacy Shield: (1) notice; (2) choice; (3) accountability for onward transfer; (4) security; (5) data integrity and purpose limitation; (6) access; and (7) recourse, enforcement and liability. Additionally, it includes the sixteen (16) supplemental principles described in the Privacy Shield: (1) sensitive data; (2) journalistic exceptions; (3) secondary liability; (4) performing due diligence and conducting audits; (5) the role of the data protection authorities; (6) self- certification; (7) verification; (8) access; (9) HR data; (10) obligatory contracts for onward transfers; (11) dispute resolution and enforcement; (12) choice - timing of opt-out; (13) travel information; (14) pharmaceutical and medical products; (15) public record and publicly available information; and (16) access requests by public authorities.

“Process” or “Processing” means any operation or set of operations which is performed upon Personal Data or sets of Personal Data, whether or not by automatic means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“Sensitive Personal Information” or “Sensitive Data” is a subset of Personal Data, which due to its nature has been classified by law or by policy as deserving additional privacy and security protections. Sensitive Personal Information consists of (a) all government-issued identification numbers (including US Social Security numbers, Canadian Social Insurance numbers, driver’s license numbers and passport numbers); (b) Individual financial account numbers (bank account numbers, credit card numbers, and other information if that information would permit access to an Data Subject’s financial account); (c) Data Subject medical/health records (e.g., fitness for duty information); (d) Personal Data obtained from a US individual reporting agency and subject to the Fair Credit Reporting Act; and (e) Personal Data regarding EU-residents that is classified as “Special Categories of Data” under EU law, which consists of the following data elements: (1) race, (2) ethnicity, (3) religion or political beliefs, (4) trade union membership, (5) health information or biometric data, (6) sexual orientation or information about the Data Subject’s sex life, and (7) information about crimes or alleged crimes committed by the Data Subjects.

“Third Party” or “Third Parties” is/are any natural or legal person(s), public authority, agency or body other than the Data Subject, Hill or Hill’s agents.

## 11.0 SUPERSEDED DOCUMENTS

Document Number & Revision	Title
DMWEST #6675537 v2 (August 2015)	Hill International Inc., Safe Harbor Privacy Policy

(May 2017)	Hill International, Inc., Privacy Shield Policy
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## 12.0 CHANGE LOG

Document all modifications to this Policy in DESCENDING order (most recent to oldest), and include when Policy was initially released and expired.

<b>Date</b>	<b>Rev</b>	<b>Change Made</b>	<b>Reason</b>	<b>Name</b>
September 23, 2016	A	New Policy	EU-U.S. Privacy Shield	Aileen R. Schwartz
April 12, 2017	B	Revised Policy	Swiss-U.S. Privacy Shield	Aileen R. Schwartz
May 8, 2017	C	Revised Policy	Information Regarding Children Updated Legal Entities	Aileen R. Schwartz
May 26, 2017	D	Revised Policy	Information Regarding Applicant Tracking Updated	Aileen R. Schwartz
March 1, 2018	E	Revised Policy	Information Regarding Automated Profiling Updated	Aileen R. Schwartz