

Faststream Recruitment Inc.

Privacy Shield Policy

As a recruitment company Faststream Recruitment Inc. processes personal data in relation to its own staff, work-seekers and individual client contacts. This Privacy Shield Policy sets forth the privacy principles Faststream Recruitment Inc. follows with respect to transfers of personal information from the European Economic Area (EEA) to the United States.

A copy of this Privacy Shield Policy is available on our website at <http://www.faststream.com/privacy/>

PRIVACY SHIELD

The EU-U.S. Privacy Shield Frameworks were designed by the U.S. Department of Commerce, and the European Commission, respectively, to provide companies on both sides of the Atlantic with a mechanism to comply with data protection requirements when transferring personal data from the European Union to the United States in support of transatlantic commerce. On July 12, 2016, the European Commission deemed the EU-U.S. Privacy Shield Framework adequate to enable data transfers under EU law.

Faststream Recruitment 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. Faststream Recruitment 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/>

SCOPE

This Privacy Shield Policy applies to all personal information received by Faststream Recruitment Inc. in the United States from the EEA, in any format, including electronic, paper or verbal.

DEFINITIONS

For purposes of this Policy, the following definitions shall apply:

“Faststream Recruitment Inc.” means Faststream Recruitment Inc., its subsidiaries, divisions and groups in the United States.

“Personal information” means any information or set of information that identifies or could be used by or on behalf of Faststream Recruitment Inc. to identify an individual. Personal information does not include information that is encoded or anonymized, or publicly available information that has not been combined with non-public personal information.

“Sensitive personal information” means personal information that reveals race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, views or activities that concerns health or sex life, information about social security benefits, or information on criminal or administrative proceedings and sanctions other than in the context of pending proceedings. In addition, Faststream Recruitment Inc. will treat as sensitive personal information any information received from a third party where that third party treats and identifies the information as sensitive.

COLLECTION AND USE OF PERSONAL DATA

Faststream provides recruitment services to clients and candidates. The personal data we collect from candidates includes name, address, telephone numbers, email addresses, qualifications and employment history by way of a curriculum vitae / resume or online application. This candidate information may be passed to a client as a submittal for a job role but permission is sought from a candidate before their details are passed on. Faststream also collects HR data regarding our employees including name, address, telephone numbers, email addresses and payroll information.

PRIVACY PRINCIPLES

The privacy principles in this Policy have been developed based on the Privacy Shield Principles.

NOTICE: Where Faststream Recruitment Inc. collects personal information directly from individuals in the EEA, we will inform them about the purposes for which we collect and use personal information about them, the types of third parties to which Faststream Recruitment Inc. discloses that information, the choices and means, if any, we offer individuals for limiting the use and disclosure of personal information about them, and how to contact us. Notice will be provided in clear and conspicuous language when individuals are first asked to provide personal information to us, or as soon as practicable thereafter, and in any event before we use or disclose the information for a purpose other than that for which it was originally collected. Where Faststream Recruitment Inc. receives personal information from its subsidiaries, affiliates or other entities in the EEA, it will use and disclose such information in accordance with the notices provided by such entities and the choices made by the individuals to whom such personal information relates.

CHOICE: Faststream Recruitment Inc. will offer individuals the opportunity to choose (opt-out) whether their personal information is (a) to be disclosed to a third party, or (b) to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual.

In the normal course of business there should be no need for Faststream Recruitment Inc. to collect sensitive personal information. However, should the need arise, we will seek permission from individual thus giving them the opportunity to affirmatively and explicitly (opt-in) to the disclosure of the information to a third party or the use of the information for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual.

Faststream Recruitment Inc. will provide individuals with reasonable mechanisms to exercise their choices.

ACCOUNTABILITY FOR ONWARD TRANSFERS: Faststream Recruitment Inc. will obtain assurances from its third parties that they will safeguard personal information consistently with this Policy. Third parties must either subscribe to the Privacy Shield principles, be subject to the Data Protection Directive or enter into a written agreement to provide the equivalent level of privacy protection. Where Faststream Recruitment Inc. has knowledge that a third party is using or disclosing personal information in a manner contrary to this Policy, we will take reasonable steps to prevent or stop the use or disclosure.

ACCESS: Upon request, Faststream Recruitment Inc. will grant individuals reasonable access to personal information that it holds about them. In addition, we will take reasonable steps to permit individuals to correct, amend, or delete information that is demonstrated to be inaccurate or incomplete. In accordance with the Privacy Shield Principles Faststream Recruitment Inc. may limit or deny access to Personal Data where the legitimate rights of persons other than the individual would be violated or if necessary to safeguard public interests (e.g. national security) or in other limited circumstances where disclosure would breach a legal or other professional privilege.

SECURITY: Faststream Recruitment Inc. will take reasonable precautions to protect personal information in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction.

DATA INTEGRITY AND PURPOSE LIMITATION: Faststream Recruitment Inc. will use personal information only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual. We will take reasonable steps to ensure that personal information is relevant to its intended use, accurate, complete, and current.

RECOURSE, ENFORCEMENT AND LIABILITY: Faststream Recruitment Inc. will conduct regular reviews of its relevant privacy practices to verify adherence to this Policy. Any employee that Faststream Recruitment Inc. determines is in violation of this policy will be subject to disciplinary action up to and including termination of employment.

In compliance with the Privacy Shield Principles, Faststream Recruitment Inc. commits to resolve complaints about our collection or use of personal information. EU individuals with inquiries or complaints regarding our Privacy Shield Policy should first contact Faststream Recruitment Inc. at the address given below.

We will investigate and attempt to resolve complaints and disputes regarding use and disclosure of personal information by reference to the principles contained in this Policy. For complaints that cannot be resolved between Faststream Recruitment Inc. and the complainant, we have further committed to cooperate with the panel established by the EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints concerning data transferred from the EU. Consumers also may be able to invoke binding arbitration to address complaints about Faststream's compliance with the Privacy Shield Principles.

Faststream Recruitment Inc. is also subject to the investigatory and enforcement powers of the Federal Trade Commission, which is the competent supervisory authority under the Privacy Shield.

LIMITATION ON APPLICATION OF PRINCIPLES

Adherence by Faststream Recruitment Inc to these Privacy Shield Principles may be limited (a) to the extent required to respond to a legal or ethical obligation; (b) to the extent necessary to meet national security, public interest or law enforcement obligations; and (c) to the extent expressly permitted by an applicable law, rule or regulation.

CONTACT INFORMATION

Questions or comments regarding this Policy should be submitted to Faststream Recruitment Inc in writing to:

US Managing Director

Faststream Recruitment Inc.

11451 Katy Freeway

Suite 640

Houston

TX 77079

Or by e-mail to info@faststream.com

You may also address and unresolved complaints to the panel of the European Data Protection Authorities:

http://ec.europa.eu/justice/data-protection/bodies/index_en.htm

CHANGES TO THIS PRIVACY SHIELD POLICY

This Policy may be amended from time to time, consistent with the requirements of the Privacy Shield Principles.