



## **INTRODUCTION**

Team Detroit, Inc. (“Team Detroit” or “Company”) is a leading full-service advertising agency that believes in protecting your privacy. Team Detroit adheres to the Safe Harbor Agreement concerning the transfer of personal data from the European Union (“EU”) to the United States of America. Accordingly, we follow the Safe Harbor Principles published by the U.S. Department of Commerce (the “Principles”) with respect to all such data. Team Detroit has established this Policy to explain how it collects, handles and processes personal information. For more information about the Safe Harbor Principles, please visit the U.S. Department of Commerce’s Website at <http://export.gov/safeharbor/>.

## **DEFINITIONS**

“Personal Information” or “Information” means information that (1) is transferred from the EU to the United States; (2) is recorded in any form; (3) is about, or pertains to a specific individual; and (4) can be linked to that individual.

## **PRIVACY PRINCIPLES**

### ***Notice:***

Team Detroit is provided with personal information from employees, consultants, freelancers, vendors, customers and clients in the course of their engagement with the Company. We will use and disclose personal information only in a manner compatible with specified and legitimate purposes related to his/her dealings with the Company including, but not limited to:

- Recruitment/appointment
- Payroll and Finance
- Keeping accounts and records of business transactions
- Monitoring and promotion of equal opportunities
- Regulatory and professional requirements
- Prevention and detection of crime
- Quality control
- Processing personal data on behalf of a client/customer

Team Detroit shall provide the individual with the choice and means for limiting the use and disclosure of their Personal Information. Notice will be provided in clear and conspicuous language when individuals are first asked to provide Personal information to the Company, or as soon as practicable thereafter, and in any event before the Company uses or discloses the information for a purpose other than for which it was originally collected.

### ***Choice:***

Team Detroit will offer individuals the opportunity to choose (opt out) whether their Personal Information is (1) to be disclosed to a third party or (2) to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual.

### ***Onward Transfers:***

Prior to disclosing Personal Information to a third party, Team Detroit shall notify the individual of such disclosure and allow the individual the choice (opt out) of such disclosure. Company shall ensure that any third party for which Personal Information may be disclosed subscribes to the Principles or are subject to law providing the same level of privacy protection as is required by the Principles and agree in writing to provide an adequate level of privacy protection.



***Security:***

Team Detroit shall take reasonable steps to protect the Personal Information from loss, misuse and unauthorized access, disclosure, alteration and destruction. Company has put in place appropriate physical, electronic and managerial procedures to safeguard and secure the Personal Information from loss, misuse, unauthorized access or disclosure, alteration or destruction. Company cannot guarantee the security of Information on or transmitted via the Internet.

***Data Integrity:***

Team Detroit shall only process Personal Information in a way that is compatible with and relevant for the purpose for which it was collected or authorized by the individual. Company shall take reasonable steps to ensure that Personal Information is accurate, complete, current and reliable for its intended use.

***Access:***

Team Detroit has a defined policy on access requests to Personal Information. Individuals may request access to their Personal Information held by the Company by making a request in writing. Team Detroit may, if necessary, require the individual making the request to provide proof of identification to verify the access request. Company shall allow an individual to correct, amend or delete inaccurate information, except where the burden or expense of providing access would be disproportionate to the risks to the privacy of the individual in the case in question or where the rights of persons other than the individual would be violated.

***Enforcement:***

Team Detroit uses an annual self-assessment approach to assure compliance with this privacy policy and periodically verifies that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented and accessible and in compliant with the EU – US Safe Harbor Framework, and when necessary, the Company shall update the Privacy Policy. We encourage interested persons to raise any concerns using the contact information provided and we will attempt to resolve any complaints and disputes regarding use and disclosure of Personal Information in accordance with the Principles.

In compliance with the Safe Harbor Principles, Team Detroit commits to resolve complaints about your privacy and our collection or use of your personal information. European Union citizens with inquiries or complaints regarding this privacy policy should first contact Team Detroit at:

Team Detroit, Inc.  
Attn: Bob Mueller  
550 Town Center Drive  
Dearborn, MI 48126

Team Detroit has further committed to refer unresolved privacy complaints under the Safe Harbor Principles to an independent dispute resolution mechanism, the BBB EU SAFE HARBOR, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed by Team Detroit, you may contact the BBB EU SAFE HARBOR program at the address below:

Council of Better Business Bureaus, Inc.  
BBB EU SAFE HARBOR  
4200 Wilson Boulevard, Suite 800  
Arlington, VA 22203  
Phone: 703-276-0100  
Web: [www.bbb.org/us/safe-harbor-complaints](http://www.bbb.org/us/safe-harbor-complaints)