

Beaver-Visitec International Holdings, Inc. Data Protection and Privacy Policy

Beaver-Visitec International Holdings Inc. and its subsidiaries, divisions and affiliates ("BVI") respects individual privacy and values the confidence of its customers, employees, vendors, business partners and others. BVI strives to collect, store, process and distribute Personal Information in a manner consistent with the laws of the countries in which it does business, and has a tradition of upholding the highest ethical standards in its business practices. The United States Department of Commerce and the European Commission have agreed on a set of data protection principles and frequently asked questions (the "Safe Harbor Principles") to enable US companies to satisfy the requirement under European Union law that adequate protection be given to Personal Information transferred from the EU to the United States.

BVI complies with the U.S. Safe Harbor Principles and the U.S.-Swiss Safe Harbor Framework developed by the U.S. Department of Commerce and the European Commission and the and the Frequently Asked Questions (FAQs) issued by the Department of Commerce on July 21, 2000 regarding the collection, use and retention of personal information from European Union member countries and Switzerland. BVI has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access and enforcement. To learn more about the Safe Harbor Program, and to view our certification, please visit <http://www.export.gov/safeharbor/>.

I. SCOPE

This Policy applies to all Personal Information received by BVI in any format including electronic, paper or verbal. BVI collects, stores and processes Personal Information concerning current and former employees, as well as applicants for employment through its Internet websites, its intranet site, electronic mail and manually, customers and vendors. BVI is the sole owner of information it collects, stores and processes from current and former employees, applicants for employment, customers, vendors and others. BVI will not sell or share this information with third parties in ways different than what is disclosed in this Data Protection Policy. On a global basis, BVI will, and will cause its affiliates to, establish and maintain business procedures that are consistent with this Policy.

Personal Information collected, stored and processed by BVI from employees and applicants for employment is maintained at its corporate offices in the United States or in the United Kingdom, or at other BVI facilities, consistent with local legislation. BVI collects Personal Information for employment related purposes and legitimate human resource business reasons such as recruitment and staffing; payroll administration; absence monitoring; training and development; management planning; appraisal and promotion; production and publication of company address books and telephone and e-mail directories; production of employee Identity cards; monitoring the use of company resources; information to contact close relatives in case of emergency; filling employment positions; administration and operations of its benefit and compensation programs; meeting governmental reporting requirements; security, health and safety management; performance management; company network access; and authentication. BVI does not request or gather information regarding political opinions, religion, philosophy or sexual preference. To the extent BVI maintains information on trade union membership, medical health, race or ethnicity, BVI will protect, secure and process that Information in a manner consistent with this Policy and applicable law.

Personal Information collected by BVI from prospective customers, consumers, vendors, business partners and others may be maintained at its corporate offices in the United States or in the United Kingdom, or at other BVI facilities, consistent with local legislation. BVI collects Personal Information for, among other things, legitimate business reasons such as customer service; product, warranty and claims administration; meeting governmental reporting and records requirements; maintenance of accurate accounts payable and receivable records; internal marketing research; safety and performance management; financial and sales data; and contact information. All Personal Information collected by BVI will be used for legitimate business purposes consistent with this Policy.

BVI has retained the Better Business Bureau to assist in dispute resolution with any complaints regarding this Policy and data security issues. BVI educates its employees concerning compliance with this Policy and has self-assessment procedures in place to assure compliance. BVI's Global Data Protection Officer and its Corporate Legal Department are available to any of its valued employees, customers, vendors, business partners or others who may have questions concerning this Policy or data security practices. Relevant contact information is provided herein.

II. DEFINITIONS

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

"Agent" means any third party that processes Personal Information provided by BVI to perform tasks on behalf of or at the instruction of BVI.

"Personal Information" means any information or set of information that identifies or could be used by or on behalf of BVI 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, trade union membership, political opinions, religious or philosophical beliefs or that concerns health or sex life. In addition, BVI will treat as sensitive Personal Information any Information received from a third party where that third party treats and identifies the information as sensitive.

III. PRIVACY PRINCIPLES

The privacy principles in this Policy are based on the seven Safe Harbor Principles.

(1) NOTICE: Where BVI collects Personal Information directly from individuals, it will inform them about the purposes for which it collects, stores and processes Personal Information about them, the types of non-agent third parties to which BVI discloses that information, and the choices and means, if any, BVI offers individuals 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 BVI, or as soon as practicable thereafter, and in any event before BVI uses the information for a purpose other than that for which it was originally collected. BVI may disclose Personal Information if required to do so by law or to protect and defend the rights or property of BVI.

(2) CHOICE: BVI will offer individuals the opportunity to choose (opt-out) whether their Personal Information is (a) to be disclosed to a non-agent 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. For Sensitive Personal Information, BVI will give individuals the opportunity to affirmatively and explicitly (opt-in) consent to the disclosure of the information to a non-agent 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.

BVI will provide individuals with reasonable mechanisms to exercise their choices should requisite circumstances arise.

(3) DATA INTEGRITY: BVI will use Personal Information only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual. BVI will take reasonable steps to ensure that Personal Information is relevant to its intended use, accurate, complete and current.

(4) **TRANSFERS TO AGENTS:** BVI will obtain assurances from its Agents that they will safeguard Personal Information. Examples of appropriate assurances that may be provided by Agents include: a contract obligating the Agent to provide at least the same level of protection as is required by the relevant Safe Harbor Principles, being subject to EU Directive 95/46/EC (the EU Data Protection Directive), Safe Harbor certification by the Agent, or being subject to another European Commission adequacy finding (e.g., companies located in Switzerland). Where BVI has knowledge that an Agent is using or disclosing Personal Information in a manner contrary to this Policy, BVI will take reasonable steps to prevent or stop the use or disclosure. BVI holds its Agents accountable for maintaining the trust our employees and customers place in the company.

(5) **ACCESS AND CORRECTION:** Upon request, BVI will grant individuals reasonable access to Personal Information that it holds about them. In addition, BVI will take reasonable steps to permit individuals to correct, amend or delete information that is demonstrated to be inaccurate or incomplete. Any employees that desire to review or update their Personal Information can do so by contacting their local Human Resources Representative.

(6) **SECURITY:** BVI will take reasonable precautions to protect Personal Information in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction. BVI protects data in many ways. Physical security is designed to prevent unauthorized access to database equipment and hard copies of sensitive Personal Information. Electronic security measures continuously monitor access to our servers and provide protection from hacking or other unauthorized access from remote locations. This protection includes the use of firewalls, restricted access and encryption technology. BVI limits access to Personal Information and data to those persons in BVI's organization, or as agents of BVI, that have a specific business purpose for maintaining and processing such Personal Information and data. Individuals who have been granted access to Personal Information are aware of their responsibilities to protect the security, confidentiality and integrity of that information and have been provided training and instruction on how to do so.

(7) **ENFORCEMENT:** BVI will conduct compliance audits of its relevant privacy practices to verify adherence to this Policy and the US Department of Commerce Safe Harbor Principles. Any employee that BVI determines is in violation of this Policy will be subject to disciplinary action up to and including termination of employment.

IV. COMPLAINTS AND DISPUTE RESOLUTION

Any questions or concerns regarding the use or disclosure of Personal Information should be directed to BVI's Data Protection and Privacy Officer and/or the Better Business Bureau. The Better Business Bureau, on behalf of BVI, will investigate and attempt to resolve complaints and disputes regarding use and disclosure of Personal Information in accordance with the principles contained in this Policy.

In compliance with the U.S.-EU and U.S.-Swiss Safe Harbor Principles, BVI commits to resolve complaints about your privacy and our collection or use of your personal information. European Union or Swiss citizens with inquiries or complaints regarding this privacy Policy should first contact BVI at:

BVI Privacy Inquiries
Attention: Harlan Harris, Global Data Protection and Privacy Officer
Beaver-Visitec International Holdings, Inc.
272 E. Deerpath Road Suite 328
Lake Forest, IL 60045
Phone No. 847-739-3217

BVI has further committed to refer unresolved privacy complaints under the U.S.-EU and U.S.-Swiss 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 acknowledgement of your complaint, or if your complaint is not satisfactorily addressed by BVI's Privacy Officer, please visit

the BBB EU Safe Harbor website at www.bbb.org/us/safe-harbor-complaints for more information and to file a complaint.

For complaints that cannot be resolved between BVI and the complainant, BVI has agreed to participate in the dispute resolution procedures of the panel established by the European Union data protection authorities and, if applicable, to cooperate and comply with the Swiss Federal Data Protection and Information Commissioner to resolve disputes pursuant to the Safe Harbor Principles.

V. INTERNET PRIVACY

BVI sees the Internet, intranets and the use of other technologies as valuable tools for communicating and interacting with customers, employees, vendors, business partners and others. BVI recognizes the importance of maintaining the privacy of Personal Information collected through websites that it operates. BVI's sole purpose for operating its websites is to provide information concerning products and services to the public. In general, visitors can reach BVI on the Web without revealing any Personal information. Visitors on the Web may elect to voluntarily provide Personal Information via BVI websites but are not required to do so. BVI collects information from visitors to the websites who voluntarily provide Personal Information by filling out and submitting online questionnaires concerning feedback on the website, requesting information on products or services, or seeking employment. The Personal information voluntarily provided by website users is contact information limited to the user's name, home and/or business address, phone numbers and email address. BVI collects this information so it may answer questions and forward requested information. BVI does not sell this information.

BVI may also collect anonymous information concerning website users through the use of "cookies" in order to provide better customer service. "Cookies" are small files that websites place on users' computers to identify the user and enhance the website experience. Company personnel periodically audit BVI's commercial websites to determine what cookies are used on each. The cookies used are typically not intrusive and are not typically used to identify visitors personally. Visitors may set their browsers to provide notice before they receive a cookie, giving the opportunity to decide whether to accept the cookie. Visitors can also set their browsers to turn off cookies. Visitors can learn how to control or delete cookies used on BVI's websites by visiting <http://www.aboutcookies.org> for detailed guidance. If visitors do suppress the website cookies, however, some areas of BVI websites may not function properly.

The information below describes the cookies used on www.beaver-visitec.com and www.odysseymed.com. To avoid these cookies, visitors can browse the website using their browser's anonymous usage setting (called "Incognito" in Chrome, "InPrivate" for Internet Explorer, "Private Browsing" in Firefox and Safari.).

Session Cookies

BVI web sites may collect information about your visits to BVI Web sites without the user actively submitting such information. Unidentifiable information may be collected using such techniques as cookies. Cookies are small text files that are transferred to a computer's hard disk by a website. The internet browser automatically transmits to BVI web sites some unidentifiable information such as URL of the WEB site visited. These passive information technologies enable BVI to provide better service to our customers, compile statistics, analyze trends and other wise administer and improve BVI's websites. Information collected by these technologies cannot be used to identify a specific user without additional identifiable information and BVI will not connect additional identifiable information with information collected through such technologies as cookies.

BVI is committed to complying with applicable laws and requirements, such as the United States' Children's Online Privacy Protection Act ("COPPA").

BVI website users have the option to request that BVI not use information previously provided, correct information previously provided, or remove information previously provided to BVI. Those that would like to correct or suppress information they have provided to BVI should forward such inquiries to:

BVI Customer Service at: customersupport@Beaver-Vistec.com

The inquiries should include the individual/company name, address, and other relevant contact information (phone number, email address). BVI will use all reasonable efforts to honor such requests as quickly as possible.

BVI websites may contain links to other "non-BVI" websites. BVI assumes no responsibility for the content or the privacy policies and practices on those websites. BVI encourages all users to read the privacy statements of those sites; their privacy practices may differ from those of BVI.

VI. CHANGES TO THIS SAFE HARBOR PRIVACY POLICY

The practices described in this Policy are current personal data protection policies as of July 1, 2013. BVI reserves the right to modify or amend this Policy at any time consistent with the requirements of the Safe Harbor Principles. Appropriate notice will be given concerning such amendments.