

 Hill International	CORPORATE POLICY
Policy Title: Global Privacy Policy	Effective Date: September 23, 2016
Author: Aileen R. Schwartz Vice President, Assistant General Counsel, and Privacy Officer	Revised May 8, 2017
Approver: William H. Dengler, Jr. Executive Vice President and General Counsel	Page: 1 of 12

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”).

1.2 SCOPE

This Privacy Policy applies to Personal Information that is Processed by Hill in the course of our business, including on Hill’s website located at 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 Information on behalf of Hill are expected to protect that data by adherence to this Privacy Policy.

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

This 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); MyLCM Solutions, Inc. (p/k/a TRS Consultants, Inc.); Trident Development Enterprise, LLC (JV Company); Legacy JV-Hill/AECOM; CCTF Project Controls Specialists LLC) 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 INFORMATION WE COLLECT AND HOW WE USE IT

The types of Personal Information 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 Information 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 Information 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. Project Management and Construction Claim 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 Information about Clients for a variety of business purposes including to:

- generally manage Client information and accounts; provide Hill International, Inc. Project Management and Construction Claim 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;
- 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 Information or otherwise with consent.

2.2 Suppliers

Hill collects Personal Information 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 Information about Suppliers for a variety of business purposes including to:

- generally manage Supplier information and accounts;
- provide Hill International, Inc. Project Management and Construction Claim 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 our 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 Data

Hill collects Personal Information from current, prospective and former Employees, their contact points in case of a medical emergency, and beneficiaries under any insurance policy (“Human Resources Data”). The Human Resources 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, 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 Human Resources 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 Human Resources-related Personal Information for a variety of business purposes including:

- Workflow management, assigning, managing and administering projects;
- Human Resources 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; and
- acquisitions, divestitures and integrations.

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 Information 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 Information with others. When using social media resources, you should take into careful consideration what Personal Information 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 Information, or whose Personal Information 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 Information 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 Information, 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 Information 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

While we currently do not participate in this practice, in the future, we may use automated processes 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.

3.0 CHOICE/MODALITIES TO OPT OUT

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

3.1 General

Where you have consented to Hill's Processing of your Personal Information or Sensitive Personal Information, you may withdraw that consent at any time and opt out. Additionally, before we use Personal Information 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 Information 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 Human Resources Data

With regard to Personal Information that Hill receives in connection with the employment relationship, Hill will use such Personal Information 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 Information for any other purpose, the Company will provide the Data Subject with an opportunity to opt-out of such uses (e.g., charity, health club membership).

3.4 “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

4.1 Information We Share

Hill does not sell or otherwise disclose Personal Information about you, except as described in this Privacy Policy or as you explicitly consent. Hill may share Personal Information with our service providers, consultants and affiliates for our and our affiliates’ internal business purposes or to provide you with a product or service that you have requested. 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 Information 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 Information 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 Information in a manner that is consistent with this Privacy Policy.

4.2 Data Transfers

All Personal Information sent or collected via 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 Information 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 Information about you, request access to Personal Information, 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 Information 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 Information, 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 endeavour 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 Information.

6.0 RETENTION

Hill retains the Personal Information we receive as described in this Privacy Policy based on the following criteria. We will retain Personal Information 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 Information provided to Hill is important to us, and Hill takes reasonable steps designed to protect your Personal Information, 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 Information, 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

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 human resources 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 Information 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 Information 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 Information (if any) for their direct marketing purposes in the prior calendar year, as well as the

type of Personal Information disclosed to those parties. Hill does not share Personal Information 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 Information 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 Information. Some Third Parties may choose to share their users' Personal Information 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 Information pursuant to the instructions of, and solely for, Hill or to which Hill discloses Personal Information 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 Information” 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) human resources 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 Information or sets of Personal Information, 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 Data” or “Sensitive Personal Information” is a subset of Personal Information which, due to its nature, has been classified by law or by policy as deserving additional privacy and security protections. Sensitive Personal Information includes Personal Information regarding EU-residents that is classified as a “Special Category of Personal Data” under EU law, which consists of the following data elements: (1) race or ethnic origin; (2) political opinions; (3) religious or philosophical beliefs; (4) trade union membership; (5) genetic data; (6) biometric data where Processed to uniquely identify a person; (6) health information; (7) sexual orientation or information about the individual’s sex life; or (8) information relating to the commission of a criminal offense. Under the Swiss-U.S. Privacy Shield Framework, the definition of Sensitive Personal Information also includes ideological views or activities, information on social security measures or administrative or criminal proceedings and sanctions, which are treated outside pending proceedings.

“Third Party” is any natural or legal person, 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

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.

Date	Rev	Change Made	Reason	Name
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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