

## HILL INTERNATIONAL, INC.

### Safe Harbor Privacy Policy

#### Safe Harbor

Hill International, Inc. (“the Company”) strives to collect, use and disclose employee personal information (defined below) in a manner consistent with the laws of the countries in which it does business. The Company abides by the *Safe Harbor Principles* developed by the U.S. Department of Commerce and approved by the European Commission as of July 26, 2000. The Company also follows the Australian Privacy Act provisions. This Safe Harbor Privacy Policy (the “Privacy Policy”) sets forth the privacy policies that the Company follows with respect to the transmission of all Company employee personal information in whatever format (including electronic, paper or verbal) to the United States from locations within the European Economic Area (“EEA”), and all other continents which we perform services, whether via telecommunication lines, computer lines, or in hard copy, whether provided by employees, generated by the Company and its subsidiaries or otherwise provided by agents or third parties.

#### Definitions

As used in this Privacy Policy:

“Employee personal information” means any data or information relating to an identified or identifiable employee of the Company that is maintained as an electronic record or in a relevant filing system. This definition covers information that, when associated with a specific employee, may be used to identify him or her, including, but not limited to, home address, telephone number, gender, birth date, payroll records, telephone and telecommunication records and performance evaluations. Anonymous information used for statistical, historic and scientific or other purposes is excluded.

“Sensitive employee information” means employee personal information that constitutes employee medical records or identifies racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, or sex life.

“Agent” means any third party that uses employee personal information provided by the Company to perform tasks on behalf of and under the instruction of the Company.

#### Privacy Principles

The following privacy principles are based upon the *Safe Harbor Principles*.

**NOTIFICATION, COLLECTION, USE, AND RETENTION OF EMPLOYEE PERSONAL INFORMATION:** The Company collects, uses and retains employee personal information only if such information is necessary and appropriate for legitimate business and legal purposes.

When the Company collects employee personal information directly from individuals in the EEA, it will inform them about the purposes for which it collects and uses personal information about them, the types of non-agent third parties to which the Company discloses that information, and the choices and

means the Company offers for limiting its use and disclosure. Notice will be provided in clear and conspicuous language when individuals are first asked to provide such information to the Company, or as soon as practicable thereafter, and in any event before the Company uses the information for the purpose other than that for which it was originally collected.

When the Company receives employee personal information from its subsidiaries, affiliates, agents and other entities in the EEA, it will use such information in accordance with the notices provided by such entities and the choices made by the individuals to whom such information relates.

Individual employee personal information is used by and shared among Company divisions, subsidiaries, affiliates, agents (i.e. IT and other professional and nonprofessional services, benefit plan sponsors and administrators, etc.), applicable government organizations and agencies, and third parties as permitted or required by law, regulation or court order.

**CHOICE:** The Company offers to its employees the opportunity to choose (opt-out) whether their employee personal information may be (a) disclosed to a non-agent third party, or (b) used for a purpose other than the purpose for which it was originally collected or subsequently authorized.

**DATA INTEGRITY:** The Company will use employee personal information only in ways that are compatible with the purposes for which it was collected or subsequently authorized. The Company will take reasonable steps to ensure that employee personal information is relevant to its intended use and is accurate, complete and current.

**TRANSFER TO AGENTS:** The Company obtains assurances from its agents that they will safeguard employee personal information consistently in accordance with this Privacy Policy. Examples of appropriate assurances include, but are not limited to, the following: (a) a contract, agreement or relevant provision obligating the agent to provide at least the same level of protection as is required by the relevant *Safe Harbor Principles*; (b) separate Safe Harbor certification by the agent; or (c) being subject to a European Commission adequacy finding. Where the Company has knowledge that an agent is using or disclosing employee personal information in a manner inconsistent with this Privacy Policy, the Company will take reasonable steps to prevent or stop the use or disclosure.

**SECURITY:** The Company maintains systems and procedures to assure the security and integrity of employee personal information, whether provided by employees, generated by the Company and its subsidiaries, or otherwise provided by agents or third parties.

The Company will take reasonable precautions to protect employee personal information in its possession from loss, misuse, and unauthorized access, disclosure, alteration or destruction. Employee personal information is made available within the Company only to those persons who possess a business need-to-know.

**ACCESS:** Upon request, the Company will grant individuals reasonable access to their employee personal information. In addition, the Company will take reasonable steps to permit individuals to correct, amend, or delete information that is demonstrated to be inaccurate or incomplete.

**ENFORCEMENT:** The Company conducts assurance reviews in the form of periodic compliance audits and surveys of human resource managers and others who manage employee personal information. This is to verify adherence to this Privacy Policy and to support annual Safe Harbor compliance certifications to the U.S. Department of Commerce.

All reported violations or potential violations will be investigated by the Human Resources Department (and such designees as the Human Resources Department may appoint), which will take such actions as are deemed appropriate in the investigation and, if necessary, remediation of the violation. Any employee that the Company determines to be in violation of this Privacy Policy may be subject to disciplinary action up to and including termination of employment. With respect to any complaints relating to the European Privacy Policy that cannot be resolved through the Company's internal procedures, the Company will participate in the dispute resolution procedures of the panel established by the European Union Data Protection Authorities to resolve disputes pursuant to the *Safe Harbor Principles*.

### **Changes to Our Privacy Policy**

This Privacy Policy may be amended from time to time, consistent with the requirements of the *Safe Harbor Principles*. Appropriate public notice will be given concerning such amendments.

### **Complaints**

Employees who consider that their right to privacy has been violated according to the provisions in the Federal law of protection of personal data in the possession of private individuals, may bring their complaints to the 1-866-352-2792, Email – [hill@openboard.info](mailto:hill@openboard.info), or through the website <https://www.openboard.info/hil/newwversion>

### **Contact**

Questions or comments regarding this Privacy Policy should be submitted by mail to:

Hill International, Inc.  
Human Resources Department  
c/o Cathy Emma, Senior Vice President and Chief Administrative Officer  
2005 Market Street, 17<sup>th</sup> floor  
Philadelphia, PA 19103  
USA

Effective as of August 1, 2008.

Updated: August 2015