



# SAFE HARBOR DATA PROTECTION AND PRIVACY POLICY

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Public Access: <http://www.icfi.com/safeharbor>

**Owner:** John George  
Chief Information Officer, ICF International

**Contact:** Joe Dyer  
Information Security Officer, ICF International  
[informationsecurityofficer@icfi.com](mailto:informationsecurityofficer@icfi.com)

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## Revision Summary

Date	Contact	Summary

# 1 Purpose/Policy

## 1.1 Purpose

ICF International, Inc. and its affiliated U.S. entities (“ICF,” “the company”) adhere to the Safe Harbor Framework as set forth by the U.S. Department of Commerce concerning the collection, use, and retention of Personal Information from the European Union (EU) member countries and transfer of that data to the United States. Accordingly, ICF certifies that it follows the EU to U.S. Safe Harbor Privacy Principles (“Principles”) with respect to notice, choice, onward transfer, security, data integrity, access, and enforcement. This Safe Harbor Privacy Policy outlines ICF’s general policy and practices for implementing these Principles, including the types of Personal Information ICF gathers, how it is used, the choices affected individuals have regarding such use, and their ability to correct the Personal Information relating to them.

To learn more about the Safe Harbor program, and to view ICF’s certification, please visit <http://www.export.gov/safeharbor>.

## 1.2 Definitions

For the purpose of this Safe Harbor Privacy Policy, the following definitions apply:

- **Personal Information** means information:
  - Transferred from the EU to the United States, and
  - Pertains to a specific individual, or which can be linked to the individual, and identifies or can be used to identify an individual.
- **Sensitive Personal Information** means Personal Information that reveals race, ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, or that concerns health or sexual orientation.

## 2 Scope

ICF collects the following categories of Personal Information obtained from the EU, including, in some instances, Sensitive Personal Information, regarding:

- Current and former personnel, as well as candidates for employment, in connection with the management and operation of the company, making services and benefits available to such employees and maintaining contact with former employees,
- Subcontractors or consultants in connection with the provisioning of services to the company,
- Prospective and current clients of the company, to provide and offer services to and to fulfill its professional obligations relating to such services, and
- To a limited extent, members of the general public to respond to requests for information from such individuals (for example, requests from individuals via our website). If a member of the general public makes an inquiry, we may use voluntarily provided Personal Information to provide the information requested.

## 3 Privacy Notice and Choice

ICF notifies individuals about the Personal Information collected, how it is used, and how to contact the company when concerns over privacy occur. ICF provides notice through this Safe Harbor Privacy Policy, hiring documents, contract documents, other privacy policies, and direct communication with the individuals from whom we collect Personal Information.

We collect Personal Information from individuals only in accordance with the Principles. In certain limited circumstances, ICF may need to obtain individuals' consent for their Personal Information to be collected, used, and/or disclosed in certain ways (including in particular for Sensitive Personal Information). Such consent is obtained by ICF through, for example, our data collection forms, engagement letters, and employment agreements.

ICF does not use Personal Information in a manner incompatible with the purpose for which the information was originally collected and authorized by the individual.

## 4 Disclosures and Onward Transfers

ICF does not disclose an individual's Personal Information to third parties, except when one or more of the following conditions is true:

- ICF has obtained the individual's permission to make the disclosure.
- The disclosure is required by law, legal process, or mandatory professional standards.
- The disclosure is reasonably related to the sale or other disposition to all or part of our business.
- The information disclosed is publicly available.
- The disclosure is to another ICF entity or to a third party providing services on ICF's or the individual's behalf (each a transferee), consistent with the purpose for which the information was obtained.

Permitted transfers of Personal Information, either to third parties or within ICF, include the transfer of data from one jurisdiction to another, including transfers to and from the United States. Because privacy laws vary from one jurisdiction to another, Personal Information may be transferred to a jurisdiction where the laws provide less or different protection than the jurisdiction in which the data originated. In such cases, ICF will take appropriate measures to protect Personal Information in accordance with the Principles.

Prior to disclosure of Personal Information about individuals to any third party, ICF will confirm that the third party subscribes to the Principles, is subject to a law providing an adequate level of privacy protection, or that the third party has agreed in writing to provide the same or equivalent level of privacy protection as required by the Principles.

## 5 Data Security, Integrity, and Access

We employ various physical, electronic, educational, and training measures to provide reasonable protection from loss, misuse or unauthorized access, disclosure, alteration, or destruction of data. These measures include password protection for electronic information systems, encryption, and restricted access to Personal Information processed by the Human Resource Department. Personal Information collected or displayed through our website is protected in transit by standard encryption processes. Although ICF takes reasonable measures to protect data, this however, cannot guarantee that information transmitted via the internet will always be transferred securely.

We process Personal Information in ways compatible with the purpose for which it was collected or authorized by the individual. To the extent necessary for such purposes, we take reasonable steps so that the Personal Information is accurate, complete, current, and otherwise reliable with regard to its intended use.

Upon request, to the extent practical, ICF will provide individuals (including current and former employees, clients, and other individuals whose Personal Information ICF processes) with reasonable access to Personal Information that it holds about them. ICF will take reasonable steps to permit these individuals to correct, amend, or delete any Personal Information that is inaccurate or incomplete.

If an individual believes that information we maintain about them is inaccurate, or if an individual would like to update or review his or her Personal Information, ICF can be contacted using the contact information provided on the cover page of this policy. ICF may limit or deny access to Personal Information in circumstances in which providing access would be unreasonably burdensome or expensive, or as otherwise permitted by the Principles. Where warranted, ICF may charge a reasonable fee for access to Personal Information.

## 6 Accountability and Enforcement

ICF will conduct annual compliance audits to verify adherence to this Policy. ICF has implemented reasonable procedures and processes to monitor adherence to the Principles and to address questions and concerns regarding adherence. ICF encourages interested persons to raise matters with ICF using the contact information provided on the cover page of this policy.

Individuals may file a dispute with the ICF Information Security Officer in connection with ICF's processing of their Personal Information under the Principles. ICF will investigate and attempt to resolve any complaints or disputes filed in accordance with this Safe Harbor Privacy Policy. With respect to any dispute relating to this policy that cannot be resolved through ICF's internal processes:

- If the matter involves Personal Information collected in the context of an employment relationship, ICF will cooperate with relevant EU Data Protection Authority(ies) and will comply with the advice of such authorities. We will also take appropriate steps to promote future compliance.
- If the dispute involves other types of Personal Information, individuals may pursue the matter by filing a claim with the American Arbitration Association.
- If Company personnel willfully violate our privacy policies, they may be subject to ICF's disciplinary process.



## 7 Information Subject to Other Policies

ICF is committed to following the Principles for all Personal Information within the scope of the Safe Harbor Framework.

Personal Information relating to ICF employees is subject to our policies concerning data privacy, which are available to current ICF employees on ICF's intranet site.

Personal information relating to members of the general public is subject to our Website Privacy Policy and Terms of Use, which are available on ICF's corporate website at <http://www.icfi.com>.

Personal Information obtained from or relating to clients or former clients is further subject to the terms in any privacy notice to the client, any contract or terms of engagement, or other similar documents with the client, and applicable laws and professional standards.

## 8 Changes to This Safe Harbor Privacy Policy

ICF periodically reviews this Policy to ensure that it is consistent with the requirements of the Principles. If we make changes to this Policy, we will post the revision on our corporate website at <http://www.icfi.com/safeharbor>.