

Litle & Co. complies with the U.S.-EU Safe Harbor Framework and to the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use and retention of personal information from European Union member countries and Switzerland. Litle & Co. has certified its compliance to the U.S. Department of Commerce. To learn more about the Safe Harbor Privacy Framework and the documents that comprise its requirements, please visit the U.S. Department of Commerce website at <http://www.export.gov/safeharbor>.

Notice

Litle & Co. receives non-public personal information for individuals related to processing payment transactions initiated through our merchant clients. This data is collected for the purposes of completing a payment for goods and services purchased on our client's website(s). The information collected consists of credit or debit card number, and CVV code. When Litle & Co. receives non-public personal information from a client for processing we are acting as an agent for the client and we do not control or share such data without direction from the client. In relation to such processing, Litle & Co. enters into appropriate agreements with the clients providing that the client is the data controller and is in compliance with the applicable EU data protection laws.

Choice

You can decide whether we can continue to use your information. If you no longer wish for your non-public personal information to be used by Litle & Co., please submit your request via email to EUprivacy@litle.com. To begin processing your request we require your name, address, and email address. We will follow up with you to verify the request, and obtain any additional information required.

Onward Transfer

Litle & Co. does not transfer non-public personal information to unrelated third parties unless lawfully directed by our client or in certain limited circumstances in accordance with the Safe Harbor Privacy Framework. Such circumstances would include disclosures of personal information required by law or legal process. In the event that Litle & Co. is directed by our client to transfer data to additional data processors, Litle & Co. will enter into appropriate agreements providing that the processor is in compliance with the applicable EU data protection laws.

Security

Litle & Co. takes reasonable physical, electronic and managerial precautions to protect the information from unauthorized access, disclosure, tampering, alteration, destruction, loss or misuse.

Data Integrity

Litle & Co. only processes personal information for the purpose which it was collected as instructed by our client. Litle & Co. takes reasonable steps to ensure that personal information is accurate, complete, current, and reliable for its intended use.

Access

An individual may contact Litle & Co. to learn whether or not personal information data relating to him or her is found in Litle & Co.'s databases. This right only applies to personal information about the individual making the request and is subject to other limitations as defined by law, or where the burden, or expense of providing access would be disproportionate to the risks related to the privacy of the individual or where the rights of other individuals would be violated.

Enforcement

Litle & Co. uses a self-assessment approach to ensure compliance with this 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 conformity with EU Data Protection Principles.

Questions & Contact Information

Questions, comments, or complaints regarding Litle & Co.'s EU Safe Harbor Policy or practices can be directed in writing to:

Litle & Co.
Attn: Chief Counsel
900 Chelmsford Street
Lowell, MA 01851

By telephone at +1-800-548-5326

Or via email at EUprivacy@litle.com

If your inquiry with Litle & Co. has not been addressed to your satisfaction, you may contact the International Centre for Dispute Resolution Safe Harbor Program at:

ICDR/AAA Safe Harbor Program
120 Broadway, 21st Floor
New York, NY 10271

<http://go.adr.org/safeharbor>