

DUTIES OF THE PRIVACY OFFICER

The Company's Privacy Officer shall implement and oversee compliance with the requirements of its Data Privacy and Security Program.

The Privacy Officer is responsible for developing and implementing policies and procedures to comply with the Program as applicable to the Company, developing employee training programs, publishing and distributing any notifications concerning the Company's policies and procedures regarding data privacy and security, and, except as otherwise provided in the Program, serving as the designated decision maker for issues and questions involving interpretation of the Program, in coordination with the Chief Information Officer, the Security Officer, the Director of Human Resources and the General Counsel. The Privacy Officer is responsible for the following tasks:

- Assessing the access, use, modification, processing, disclosure and destruction of Personal Information.
- Working with legal counsel and management, key departments and committees to ensure the Company has and maintains appropriate privacy consent and authorization forms and information notices and materials, including amendments to company documents, negotiating privacy and security provisions of vendor contracts and developing any applicable authorizations.
- Establishing and implementing appropriate administrative and technical firewalls within the Company's organization.
- Establishing a complaint process, investigation procedure, and sanctions policy.
- Developing overall data privacy and security policies and procedures for the Company.
- Establishing programs to audit and monitor vendors and internal data privacy and security compliance where appropriate.
- Keeping up to date on the latest privacy and security developments and requirements under relevant laws and regulations that may affect the requirements under the Data Privacy and Security Program.
- Coordinating with the Security Officer to, among other things, review all system-related information throughout the information systems of the Company to ensure alignment between security and privacy practices and to act as a liaison to the Company's information systems departments.
- Cooperation with internal and/or outside counsel, and Company officers in any compliance reviews or investigations