

SAFE HARBOR POLICY

Effective October 6, 2015, the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework (collectively, the “**Safe Harbor Privacy Principles**”) 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the collection, use, and retention of personal information from European Union member countries and Switzerland are no longer valid. Although Navico, Inc. previously complied with the Safe Harbor Privacy Principles, in light of its repeal Navico, Inc. has elected to adopt the EU’s Model Contracts for the transfer of personal data. To learn more about the data protection provided under these Model Contracts please visit <http://ec.europa.eu/justice/data-protection/international-transfers/>.

Despite the repeal of the Safe Harbor Privacy Principles, Navico, Inc. (the “**Company**”, “**we**”, “**us**” or “**our**”) continues to comply with such principles. The Company adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, please visit <http://www.export.gov/safeharbor>. This Safe Harbor Policy (the “**Safe Harbor Policy**”) outlines our general policies and practices with regard to the implementation of the Safe Harbor Privacy Principles. This Safe Harbor Policy applies to Personal Information received by the Company whether in electronic, paper or verbal format.

Definitions

For the purposes of this Safe Harbor Policy “Personal Information” means information that (i) is transferred from the European Union or Switzerland to the United States; (ii) is recorded in any form; (iii) is about, or pertains to a specific individual; and (iv) can be linked to that individual.

Notice

We notify our customers located in the European Union and Switzerland about the purposes for which we collect and use Personal Information, the types of third parties to which we disclose Personal Information (for example, service providers that process Personal Information on our behalf), certain privacy rights of our customers (such as the right to access Personal Information and the choice for limiting the use and disclosure of the information), and how to contact us about our practices concerning Personal Information. Customers may view our Privacy Policy by clicking [here](#).

Purpose of Collection and Use of Personal Information

We collect Personal Information about our customers to (i) process transactions they request, (ii) improve the quality of our products and services, (iii) send communications about our products, services and promotions, (iv) enable our service providers to perform certain activities on our behalf, and (v) comply with our legal obligations, policies and procedures and for internal administrative and analytics purposes.

Choice

Customers located in the European Union and Switzerland may direct us not to disclose their Personal Information to third parties (other than our service providers). We do not use Personal Information for purposes incompatible with the purposes for which we originally collected the information without notifying the relevant individuals of such uses and offering an opportunity to opt out.

We may disclose Personal Information without offering individuals an opportunity to opt out (i) if we are required to do so by law or legal process, (ii) to law enforcement authorities, or (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity. We also reserve the right to transfer Personal Information we have about users in the event we sell or transfer all or a portion of our business or assets. Should such a sale or transfer occur, we will use reasonable efforts to direct the transferee to use Personal Information you have provided to us in a manner that is consistent with our Privacy Policy.

Onward Transfer of Personal Information

We may share Personal Information with service providers we have retained to perform services on our behalf. We require service providers to whom we disclose Personal Information and who are not subject to laws based on the European Union Data Protection Directive to contractually agree to provide at least the same level of protection for Personal Information as required by law.

Access to Personal Information

The Company provides customers with reasonable access to the Personal Information maintained about them. We also provide a reasonable opportunity, as required by applicable law, to correct, amend or delete that information where it is inaccurate. We may limit or deny access to Personal Information where providing such access is unreasonably burdensome or expensive under the circumstances or as otherwise permitted by the Safe Harbor Privacy Principles. To obtain access to Personal Information, customers may contact the Company as specified in the "How to Contact Us" section of this Safe Harbor Policy.

Security

The Company maintains reasonable administrative, technical and physical safeguards to protect Personal Information from loss, misuse and unauthorized access, disclosure, alteration, destruction and against all other unlawful forms of processing.

Data Integrity

The Company takes reasonable steps to ensure that Personal Information that we collect is relevant for the purposes for which it is to be used and that the information is accurate, complete and current. We depend on our customers to update and correct their Personal Information whenever necessary, but will take action if we become aware of any erroneous information.

Enforcement and Oversight

The Company has established procedures for periodically verifying implementation of and compliance with the Safe Harbor Privacy Principles. We conduct a self-assessment of our practices with respect to Personal Information to verify that representations we make about our Personal Information privacy practices are true and that related privacy policies have been implemented as represented.

Customers may file a complaint with the Company in connection with the processing of their Personal Information under the Safe Harbor Privacy Principles. We will take steps to remedy any issues arising out of a failure to comply with the Safe Harbor Privacy Principles. We will also cooperate with the American Arbitration Association in accordance with its applicable commercial rules to address individuals' complaints regarding privacy issues. Please contact us as specified in the "How to Contact Us" section of this Safe Harbor Policy to address any complaints regarding our Personal Information practices.

How to Contact Us

Please address any questions or concerns regarding this policy by contacting us at GoFreeSupport.amer@navico.com.