

## SAFE HARBOR POLICY STATEMENT

Ampac Holdings, LLC (*Ampac Holdings, LLC*) respects individual privacy and values the confidence of its business partners, their customers and its employees and other persons whose personal data becomes known to Ampac Holdings, LLC. Ampac Holdings, LLC strives to collect, use and disclose Personal Information in a manner consistent with the laws of the countries in which it does business. It has a tradition of upholding the highest ethical standards in its business practices. This Safe Harbor Privacy Policy (the *Policy*) sets forth the following Safe Harbor privacy principles (the *Principles*) that Ampac Holdings, LLC follows with respect to Personal Information transferred between the European Economic Area (which includes the member states of the European Union) and the United States.

**Notice.** When Ampac Holdings, LLC collects and uses Personal Information, it will inform the individuals to whom the information pertains about the purposes of such collection and usage, how to contact Ampac Holdings, LLC with any inquiries or complaints, the types of third parties to which Ampac Holdings, LLC discloses the information, and the choices and means Ampac Holdings, LLC offers individuals for limiting its use and disclosure. This notice will be provided in clear and conspicuous language when individuals are first asked to provide Personal Information to Ampac Holdings, LLC or as soon thereafter as is practicable, but in any event before Ampac Holdings, LLC uses such information for a purpose other than that for which it was originally collected or processed by the transferring organization or discloses it for the first time to a third party.

**Choice.** Ampac Holdings, LLC will offer individuals the opportunity to choose (opt out) whether their Personal Information is (a) to be disclosed to a third party or (b) to be used for a purpose that is incompatible with the purpose(s) for which it was originally collected or subsequently authorized by the individual. Individuals will be provided with clear and conspicuous, readily available, and affordable mechanisms to choose. For Sensitive Information, individuals will be given affirmative or explicit (opt in) choice if the information is to be disclosed to a third party or used for a purpose other than those for which it was originally collected or subsequently authorized by the individual through the exercise of opt in choice.

**Onward Transfer.** To disclose Personal Information to a third party, Ampac Holdings, LLC will apply the Notice and Choice Principles. Where Ampac Holdings, LLC wishes to transfer information to a third party that is acting as an Agent, it will first either ascertain that the third party subscribes to the Principles or is subject to the European Commission's Directive on Data Protection or another adequacy finding or enter into a written agreement with such third party requiring that the third party provide at least the same level of privacy protection as is required by the relevant Principles. If Ampac Holdings, LLC complies with these requirements, it will not be held responsible (unless Ampac Holdings, LLC agrees otherwise) when a third party to which it transfers such information processes it in a way contrary to any restrictions or

representations, unless Ampac Holdings, LLC knew or should have known the third party would process it in such a contrary way and Ampac Holdings, LLC has not taken reasonable steps to prevent or stop such processing.

***Security.*** Ampac Holdings, LLC will take reasonable precautions to protect Personal Information from loss, misuse and unauthorized access, disclosure, alteration and destruction.

***Data Integrity.*** Consistent with the Principles, Personal Information will only be used if it is relevant for such purposes. Ampac Holdings, LLC will not process Personal Information in a way that is incompatible with the purposes for which it has been collected or subsequently authorized by the individual. To the extent necessary for those purposes, Ampac Holdings, LLC will take reasonable steps to ensure that Personal Information is reliable for its intended use, accurate, complete, and current.

***Access.*** Individuals can access Personal Information about them that Ampac Holdings, LLC holds and will be able to correct, amend, or delete that information where it is inaccurate, except where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy in the case in question, or where the rights of persons other than the individual would be violated.

***Enforcement.*** Ampac Holdings, LLC will conduct compliance audits of its relevant privacy practices on a six-month basis. The audits will be conducted by the Privacy Officer, or the Privacy Officer's designee, and are designed to verify adherence to this Policy. Any employee that Ampac Holdings, LLC determines is in violation of this Policy will be subject to disciplinary action including termination of employment or other form of association with Ampac Holdings, LLC.

***Dispute Resolution.*** Any questions or concerns regarding the use or disclosure of Personal Information should be directed to the Privacy Officer of Ampac Holdings, LLC, at the address given below. Any individual presenting a question or concern about Personal Information must submit a written dispute resolution request providing the details of the issue in order for the Privacy Officer effectively to evaluate the issue. The Privacy Officer will investigate and attempt to resolve complaints and disputes regarding use and disclosure of Personal Information in accordance with the principles contained in this Policy. For complaints that cannot be resolved between Ampac Holdings, LLC and the complainant, Ampac Holdings, LLC elects to participate in the dispute resolution procedures of the home country of the complainant and will cooperate with the European data protection authorities to investigate and resolve disputes pursuant to the Principles. Ampac Holdings, LLC will comply with any advice given by the competent European data protection authority where the European data protection authority takes the view that Ampac Holdings, LLC needs to take specific action to comply with the Principles, including remedial or compensatory measures for the benefit of individuals

affected by any non-compliance with the Principles. Ampac Holdings, LLC will provide the competent European data protection authority with written confirmation that such action has been taken.

### **Limitation on Application of Principles**

Adherence by Ampac Holdings, LLC to these Principles may be limited (a) to the extent required to respond to a legal or ethical obligation (for example a national security requirement); and (b) to the extent expressly permitted or required by an applicable law, rule or regulation.

### **Contact Information**

Questions or comments regarding this Policy should be submitted to our Privacy Officer by mail as follows:

Ampac Holdings, LLC  
12025 Tricon Road, Cincinnati, OH 45246  
Telephone: 513-671-1777  
Fax: 513-671-2920

### **Changes to Data Privacy Policy**

This Policy may be amended from time to time, consistent with the requirements of the Principles.

### **Definitions**

**Agent** means any person or third party that collects or uses Personal Information under the instructions of, and solely for, Ampac Holdings, LLC or to whom Ampac Holdings, LLC discloses Personal Information for use on Ampac Holdings, LLC's behalf.

**Personal Information** means any information relating to an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to physical, physiological, mental, economic, cultural or social identity.

**Sensitive Information** is defined as Personal Information specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or information specifying the sex life of the individual.

**Privacy Officer** means the individual responsible for internal audit of processes and procedures to safeguard Personal Information and for ensuring that transfers are consistent with applicable law.