

KBE Building Corporation
Social Security Number
Privacy and Protection Policy
Effective 10/01/2008

KBE Building Corporation ("KBE") believes that dealing with personal information in a proper manner is an important responsibility. As such we will protect the confidentiality of, prohibit unlawful disclosure of, and limit access to the Social Security numbers of individuals whose information is obtained in the necessary course of our business. KBE will comply with all Federal and State laws and regulations concerning privacy of personal information.

PERSONAL INFORMATION

"Personal information," as used throughout this policy, is information associated with an individual through one or more identifiers, including but not limited to Social Security number, driver's license number, passport number, or other identification number and does not include information that is publicly available.

ACQUISITION AND USE OF PERSONAL INFORMATION

KBE will acquire personal information in a lawful manner, and where use of such information is restricted, the personal information will not be used for any purpose other than as specified. KBE will only collect personal information which is necessary in the course of our business. We will ensure that we do not collect any more personal information than is necessary. KBE will limit our use of personal information to appropriate, business related purposes. Social Security numbers in their entirety will not be used as identifiers or account numbers in the course of business.

DISCLOSURE OF PERSONAL INFORMATION

KBE will not release personal information to any third party unless prior authorization is obtained or due legal or regulatory procedure is followed. No personal information will be used in open computer transmissions, company distributions or through the company Intranet. Transmission of such information will be only by secure connection or when password protected or encrypted.

In addition, KBE will not publicly post or display any employee's personally identifying information. This information may include, in addition to Social Security number, home address or telephone number, personal email address, parents' surname before marriage and driver's license number.

STORAGE OF PERSONAL INFORMATION

All documents containing personally identifiable information will be stored in locked secured areas. All computer applications containing personally identifiable information shall

be maintained on secure servers rather than saved locally. In the event that data must be stored locally, it is to be stored on password-protected, authorized-access computers only. Data stored on web-based applications will be encrypted to prevent access to personal information. KBE employs intrusion detection and auditing systems to identify and attempt to prevent unauthorized access to data on our electronic systems. Portable devices such as laptop computers and back-up tapes are to be password or encrypted to prevent unauthorized access to data contained on such devices.

ACCESS TO PERSONAL INFORMATION

Only persons with legitimate business reason to access personal information will be allowed access to the data, and such access will be granted through department managers responsible for securing this data. Department managers and employees granted such access must take all necessary precautions to ensure the integrity of records that include personal information when the records are not being used.

PERSONAL INFORMATION SENT VIA EMAIL

We exercise great care to protect personal information. This includes using industry standard techniques such as firewalls, encryption, intrusion detection and site monitoring. Unfortunately, no data transmission over the Internet can be guaranteed to be completely secure. As a result, while we strive to protect employees' personal information, we cannot ensure or warrant the security of any information employees transmit to us, especially information transmitted to us via email. We have no way of protecting that information until it reaches us. Once we receive a transmission, we make our best effort to ensure its security on our servers.

RETENTION AND DISPOSAL OF PERSONAL INFORMATION

Records that include personal information will be maintained in accordance with Federal and State law. Subject to legal requirements, when documents containing personal information are no longer required the information shall be disposed of, at which time the records will be destroyed by shredding. When necessary to destroy documents stored digitally on a computer system, they will be erased or otherwise rendered inaccessible.

POLICY TRAINING, REVIEW AND ADHERENCE

All employees with access to personal information will receive training and instruction on this policy. Employees will be required to review and retrain on this policy as we deem appropriate. KBE will review our policy annually, or as necessary to be in compliance with laws and regulations concerning personal information. All executives, managers and employees are expected to rigorously adhere to this policy. Any employee violating the provisions of this policy and its operating procedures will be disciplined in accordance with company rules, up to and including termination.