

## **Privacy Policy**

RCB Fund Services, LLC (“RCB Fund Services”) has created this Privacy Policy to identify the types of personal information RCB Fund Services may collect from you and to inform you of how RCB Fund Services may use that information. RCB Fund Services complies with all applicable laws and regulations on data privacy protection and security, and abides by the Safe Harbor Principles developed by the United States Department of Commerce and the European Commission on July 21, 2000.

This policy outlines RCB Fund Services’ principles and guidelines regarding the types of personal information we gather, how we use it, how we secure it, and individuals’ ability to correct that information.

## **The Information RCB Fund Services Collects**

This Privacy Policy applies to all personal information collected by or submitted to RCB Fund Services. RCB Fund Services may collect information in a number of ways, including personal information provided directly from an individual on a Proof of Claim Form, through this website or other similar means; personal information provided by a company involved in the administration of the claim; or personal information provided from a broker or other intermediary acting on the individual’s behalf.

The majority of the personal information collected by RCB Fund Services is either off-line or manually processed data. There is minimal on-line data collection. Some examples of the personal information RCB Fund Services collects may include: your name, address, e-mail address, phone number, social security number and other relevant brokerage account information.

## **Use of the Information**

The personal information you provide will be used by RCB Fund Services only as necessary to administer your claim during the claims administration process. RCB Fund Services may also use the personal information to respond to your inquiries or to comply with applicable laws and regulations. Your personal information will be entered into our secure database, which will allow RCB Fund Services to create a record for each potentially eligible claimant.

## **Transfer of Information**

In administering your claim, RCB Fund Services may share personal information with the SEC or the appropriate United States District Court solely for the purpose of furthering the claims administration process. RCB Fund Services may also share personal information with subcontractors and professional service providers that are assisting in the claims administration process. All subcontractors and professional service providers are bound by the same privacy obligations detailed in this policy and will only use the personal information to perform their duties in connection with the

claims administration process. RCB Fund Services will ensure the adequacy of each third party's privacy protection, and if necessary, will script and enter into a written agreement with such third party requiring the third party to provide at least the same level of privacy protection as is required herein.

RCB Fund Services will only provide an individual's personal information to a third party if the disclosure is reasonably related and necessary to complete the claims administration process, and the use of the information is consistent with the purpose for which the information was obtained. Information collected by RCB Fund Services is not used for marketing purposes. RCB Fund Services does not sell personal information and does not use or otherwise disclose personal information for any purpose other than the administration of an individual's claim.

### **Data Security**

The personal information collected by RCB Fund Services is stored and protected by adequate security measures designed to prevent unauthorized access, disclosure, alteration, destruction and use. The security measures are reviewed regularly to ensure their adequacy and effectiveness.

### **Access to Personal Information**

Upon request, RCB Fund Services will provide individuals reasonable access to their personal information held by RCB Fund Services, and RCB Fund Services will provide individuals an opportunity to correct, amend or delete information that is inaccurate or incomplete. As a security precaution, RCB Fund Services will require adequate proof of identification before providing access to personal information. RCB Fund Services retains the right to limit or deny access to personal information when providing such access would be unreasonably burdensome or expensive under the circumstances.

### **Enforcement**

RCB Fund Services utilizes the self-assessment approach to assure its compliance with this privacy policy. RCB Fund Services will conduct periodic reviews of its privacy practices to verify adherence to this policy. Any RCB Fund Services employee acting in violation of this policy will be subject to disciplinary action up to and including termination.

Any questions or concerns regarding the use or disclosure of personal information should be directed to RCB Fund Services at the email or phone number provided below. RCB Fund Services will investigate and attempt to resolve complaints and disputes regarding the use and disclosure of personal information in accordance with the terms of this policy. With respect to any complaints relating to this privacy policy that cannot be resolved internally, RCB Fund Services has agreed to participate in the dispute resolution procedures of the panel established by the European Union Data Protection Authorities

(“DPAs”) to resolve disputes according to the Safe Harbor Principles, and to comply with any advice provided by the DPAs.

### **Contact Information**

If you have any questions, concerns, or comments about RCB Fund Services’ privacy policy you may contact us either:

By e-mail: [info@ShellSECSettlement.com](mailto:info@ShellSECSettlement.com) or [info@ShellClassActionSettlement.com](mailto:info@ShellClassActionSettlement.com)  
By Phone: (866) 446-3412

### **Privacy Statement Changes**

RCB Fund Services reserves the right to make any necessary changes to this policy without notice, and any changes to this policy will be promptly posted on this website.

Effective Date: July 9, 2008