EXHIBIT A

## UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION

In the Matter of	
WORLD INNOVATORS, INC., a corporation.	

DOCKET NO.

## **DECLARATION OF DAMON C. GREER**

I, Damon C. Greer, based upon my personal knowledge concerning matters to which I am competent to testify, hereby declare as follows:

- 1. I am the Associate Director for Electronic Commerce in the Office of Technology and Electronic Commerce at the U.S. Department of Commerce ("Commerce"), and I am the lead administrator of the U.S.-E.U. Safe Harbor Framework.
- 2. Commerce is not a party to the captioned matter.
- 3. Commerce is responsible for developing and overseeing the U.S.-EU Safe Harbor Framework ("Safe Harbor"), a voluntary program that provides U.S. companies with a method for receiving personal data lawfully from the European Union. To join the Safe Harbor, a company must self-certify to Commerce that it complies with a set of principles that have been deemed to meet the EU's adequacy standard.
- 4. As Associate Director, I am responsible for maintaining an accurate list of those companies that self-certify to Commerce that they comply with the Safe Harbor principles. As part of my responsibilities, I oversee a public website, <u>www.export.gov/safeharbor</u>, where I post the names of companies that have self-certified. The listing of companies indicates, among other things, whether their self-certification is "current" or "not current." Companies are required to re-certify every year on the anniversary of the date they first self-certified in order to retain their status as "current" members of the Safe Harbor framework.
- 5. In September 2001, World Innovators, Inc. ("World Innovators") submitted a selfcertification to Commerce, which it renewed in September 2002 and September 2003. World Innovators' next self-certification was due in September 2004.

6. World Innovators did not submit a self-certification by the September 2004 deadline. To date, I have not received any documents or information from World Innovators to renew its self-certification. World Innovators is in "not current" status on the Commerce website.

I declare under penalty of perjury under the Laws of the United States of America that the foregoing is true and correct. Executed this  $\int_{-\infty}^{+\infty} day$  of June, 2009, in Washington, D.C.

Damon C. Greer Associate Director for Electronic Commerce Office of Technology and Electronic Commerce U.S. Department of Commerce EXHIBIT B

World Innovators, Inc. - Mailing List Managers, Mailing Lists Management & Consultation, Direct Resp., Page 1 of 1

	MAILING LIST MANAGEMENT/CONSULTATION DIRECT RESPONSE MARKETING
	PRIVACY POLICY STATEMENT WORLD INNOVATORS, INCORPORATED
	World Innovators, Incorporated provides this web site as an informational source for its clients and prospective customers. World Innovators honors the privacy of its clients and visitors and will uphold the privacy policies set forth by the Direct Marketing Association and the Safe Harbor Principles as outlined by the U.S. Department of Commerce and the European Commissions.
	World Innovators certifies that as of May 30, 2001 it encourages its list management clients to comply with the Direct Marketing Association Privacy Policy. This policy provides effective guidelines for honoring and respecting the privacy by:
	<ol> <li>Honoring a customer's request not to be included on in-house lists used for solicitations. A name may be removed simply by contacting us to do so.</li> </ol>
	2. Providing customers with the ability to opt-out of data rental, sale or exchange.
	3. Adhering to a customer's request to opt-out of having their information included as part of a data rental, sale or exchange.
	<ol> <li>Using one or more of the DMA Preference Services mail, telemarketing or e- mail) to suppress names from campaigns for individuals who have requested not to be included in these solicitation efforts.</li> </ol>
	Our web site does not recognize a caller or collect e-mail addresses of visitors to our web site. However, if information is requested, we will collect personal information such as name, company and address for future in-house marketing purposes.
	World Innovators promises to uphold the highest standard of data privacy and security as per the Direct Marketing Association and the World Innovators' Privacy Policy.
	World Innovators is a member of the U.S. Department of Commerce Safe Harbor program.
	Any questions or comments regarding the World Innovators Privacy Policy or the Safe Harbor program should be directed in writing to:

Anne M. Peterson, President World Innovators, Incorporated 72 Park Street New Canaan, CT 06840 or apeterson/a/worldinpovators.com



EXHIBIT C

World Innovators, Inc. - List Brokerage/Management, Mailing List Managers, Mailing Lists Manageme... Page 1 of 2



World Innovators, Inc. - List Brokerage/Management, Mailing List Managers, Mailing Lists Manageme... Page 2 of 2



Anne M. Peterson, President World innovators, Incorporated 22 Bacon Road Roxbury, CT 06783 or apeterson@worldinnovators.com

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## EXHIBIT D

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World Innovators, Inc. - List Brokerage/Management, Mailing List Managers, Mailing Lists Manageme... Page 2 of 2

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**EXHIBIT E** 

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