

Iris Data Services, LLC Privacy Policy

I. Overview And Applicability

Iris Data Services, LLC supports the right to privacy, including the rights of individuals to control the dissemination and use of personal data that describes them, their personal choices, or life experiences. Iris Data Services, LLC supports domestic and international laws and regulations that seek to protect the privacy rights of such individuals.

This policy applies to all Iris Data Services, LLC employees, contractors, temporaries, and consultants, and other workers. All of these people are expected to be familiar with and fully in compliance with these policies. Workers who are not in compliance are subject to disciplinary action up to and including termination.

This policy also applies to outsourcing organizations that perform information-processing services on behalf of Iris Data Services, LLC. Use of outsourcing organizations to process personal data must always include a contractual commitment to consistently observe these policies and related Iris Data Services, LLC procedures and standards as specified by the Information Security department. All outsourcing organizations handling personal data provided by Iris Data Services, LLC must periodically issue certificates of compliance with this policy, and permit Iris Data Services, LLC to initiate independent audits to determine compliance with this policy.

II. Definitions

Personal data—Any information relating to an individual. Such data includes name, address, telephone number, address, social security number, driver’s license number, and personal business transaction details. For example, such a person could be a purchaser of Iris Data Services, LLC products. The following policies do not apply to statistical reports or other collections of information in which specific natural persons are not identifiable.

Processing of personal data or “processing”—Any operation or set of operations performed on personal data, whether by automatic means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, combination, blocking, erasure or destruction.

Owner—The Iris Data Services, LLC manager or executive, who determines the purposes for processing personal data, and who makes decisions about the security mechanisms to be used to protect such personal data.

Custodian—The Iris Data Services, LLC manager, or third-party organization manager if processing is outsourced, who processes personal data according to the instructions provided by the Owner.

Third party—Any person, partnership, corporation, public authority, government agency, or any other entity other than the individual, Owner, Custodian, and the persons who, under the direct authority of the Owner or the Custodian, are authorized to process the data.

Recipient—The person, public authority, government agency, or any other entity to whom personal data is disclosed, even if the recipient is a third party.

Consent—Any freely-given informed indication of his or her wishes by which the individual signifies his or her agreement to have his or her personal data processed, which may include disclosure.

No distinction between data, information, knowledge, or wisdom is made in this policy.

III. Specific Requirements

1. All personal data must be processed fairly and lawfully, according to the laws and regulations of all jurisdictions where Iris Data Services, LLC does business.
2. Personal data must be collected for purposes communicated to the individual and not further processed in a way incompatible with those purposes. Further processing of such data for historical, statistical or other business purposes is not incompatible with the original purpose provided the further processing includes adequate additional controls protecting the rights of the individual.
3. The amount of personal data collected must be adequate, relevant, and not excessive in relation to the purposes for which they are collected or for which they are further processed.
4. Personal data must be accurate and complete, and where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that is inaccurate or incomplete, keeping in mind the purposes for which it was collected or for which it is further processed, are definitively erased or corrected.
5. Individuals must be given an opportunity to examine, and issue complaints about, inaccuracies and incompleteness in records containing their personal data. Investigations of complaints must be performed promptly, and must be answered with a letter informing the involved individuals about the courses of action that Iris Data Services, LLC will take. Any resulting erasures or corrections must be performed promptly and at no cost to the individuals. Reasonable steps to prevent reoccurrence of the same inaccuracies or incompleteness must also be taken, for instance by adding an explanatory paragraph in the subject's file. An exception to the requirements stated in this paragraph is permitted for personal data in management succession planning records, criminal activity investigation records, and other legitimate business activities where disclosure to the individual would be highly likely to jeopardize the project underway.

6. Personal data must not be kept in a form that permits identification of individuals for any longer than is necessary for the purposes for which the data was collected or for which it is further processed. For example, this can be implemented with linked separate files respectively containing identification information and related sensitive information. Owners of personal data are responsible for ensuring that items in the preceding points are complied with.
7. Personal data may be processed only if:
 - The individual has given his or her consent unambiguously.
 - Processing is necessary for the performance of a contract to which the individual is party, such as completing an order for goods.
 - Processing is required to respond to a request made by the individual.
 - Processing is necessary for compliance with a legal obligation to which the Owner is subject.
 - Processing is necessary in order to protect the vital interests of the individual.
 - Processing is necessary to explore or provide new business products or services that may be of use to the Owner, as long as these new products or services do not override the fundamental rights or freedoms of the individual.
8. Processing personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, criminal offenses, health, or sex life is prohibited unless:
 - The individual has provided explicit consent to such processing.
 - Processing is necessary for the purposes of carrying out the obligations and specific rights of the Owner in the field of employment law.
 - Processing is necessary to protect the vital interests of the individual or of another person where the individual is physically or legally incapable of giving his or her consent. Custodians of personal data are responsible for ensuring that items in the preceding two points are complied with.

IV. Information to be Given to the Individual

The Owner or his or her representative must provide individuals with the following information:

- The identity of the Custodian and of his or her representative, if any.
- The purposes of the processing for which the data is intended.
- The policies related to handling personal data, including material changes to these policies that have gone into effect since the personal data was collected.
- Any further information such as:
 - The recipients or categories of recipients of the data.
 - Whether replies to the questions are obligatory or voluntary, and the possible consequences of the failure to reply.
 - The existence of the right of access to and the right to correct the data concerning the individual.

Where personal data has not been obtained directly from the individual, the Owner or his or her representative must notify the individual at the time when personal data will be

processed. If a disclosure to a third party is anticipated, the individual must be notified no later than the time when the data is disclosed. The Owner must provide the individual with at least the following information, except where the individual already knows it:

- The identity of the Custodian and the Custodian's representative, if any.
- The purposes of the processing.
- Any further information such as:
 - The categories of data concerned.
 - The recipients or categories of recipients.
 - The existence of the right of access to and the right to correct information concerning the individual.

Upon request, the Owner or his or her representative must provide all individuals with a brief written summary of the subject's rights to learn about, get copies of, lodge objections to, and correct personal data. Trained personnel who can explain an individual's rights must be available to subjects by telephone.

If Iris Data Services, LLC changes its privacy policy, an attempt to notify all individuals must be promptly initiated. As a part of this notification, Iris Data Services, LLC must provide individuals with a summary of the words that have changed and what these changes mean. Individuals also must be given an opportunity to be removed from Iris Data Services, LLC records.

V. Individual's Right Of Access To Data

Every individual has the right to obtain the following from the Custodian:

1. Without undue constraint at reasonable intervals and without excessive delay or expense:
 - Confirmation as to whether data relating to him or her is processed and information at least as to the purposes of the processing, the categories of data concerned, and the recipients or categories of recipients to whom the data is disclosed.
 - Details as to the source of information about the individual, if such information is recorded.
 - Communication of the personal data to the subject in an intelligible form.
 - Knowledge of the logic involved in any automatic processing of data concerning him or her at least in the case of the automated decisions affecting the individual.
2. When appropriate, an indication that his or her personal data has been corrected, erased, or blocked because it was incomplete or inaccurate.
3. Notification to third parties to whom the data has been disclosed of any correction, erasure, or blocking carried out in compliance with the prior paragraph, unless this proves impossible or involves a unreasonable effort or expense.

VI. Individual's Right To Object

Individuals may object, free of charge, to the processing of personal data that the Owner anticipates will be processed for the purposes of direct marketing. Owners must provide prompt processing mechanisms that permit individuals who objected to be removed from direct marketing lists.

Individuals must be informed before personal data is disclosed for the first time to third parties or used on their behalf for the purposes of direct marketing. Individuals must be expressly offered the right to object free of charge to such disclosures or uses. Owners must provide processing mechanisms that permit individuals who objected to block such a disclosure.

VII. Disclosure Of Personal Data To Third Parties

Iris Data Services, LLC may provide third parties with personal data processed on its systems for generally accepted business purposes such as court orders, subpoenas, employment verification, governmental licensing, underwriting, and other reasons. All recipients of such information must definitively identify themselves, certify in writing the legal and customary purposes for which the information is sought and certify that the personal data will be used for no other purposes.

All disclosures to government agencies and other third parties must be preceded by written or other notice sent to the individual. A blanket, one-time approval of such disclosures is sufficient. Sufficient time must be provided between the receipt of such notice to the individual and the actual disclosure to the third party to permit the individual to object, should he or she so elect.

VIII. U.S.-E.U. Safe Harbor Framework

Personal data from the European Union and/or on EU citizens may be collected by Iris Data Services, LLC and may be stored and processed in the United States or any other country in which Iris Data Services, LLC or its affiliates, subsidiaries or agents maintain facilities. By your employment at Iris Data Services, LLC, you consent to any such transfer of data outside of your country. Iris Data Services, LLC abides by the privacy principles of the Safe Harbor framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of data from the European Union. If you believe your privacy may have been violated based on the principles set forth in the Safe Harbor framework, please contact corporate headquarters in writing and provide a description of the possible violation. Iris Data Services, LLC will investigate and attempt to resolve any such possible violation. If you do not find the proposed solution satisfactory, Iris Data Services, LLC will resolve the dispute under the enforcement principle of the Safe Harbor framework through the American Arbitration Association, our selected third-party dispute mechanism, or the E.U. Data Protection Agency for E.U. human resource data.

In processing personal data, COMPANY complies with the following Safe Harbor Principles:

Notice: Iris Data Services, LLC notifies all identified EU data subjects about the purposes for which personal information is collected and used. In certain situations, data is “anonymized,” so that the names of the data subjects are not known by data processors within Iris Data Services, LLC. In these cases, data subjects do not need to be notified.

Choice: Iris Data Services, LLC gives each data subject the opportunity to opt out from allowing Iris Data Services, LLC to disclose his/her personal information to a third party or to use it for a purpose incompatible with the purpose for which it was originally collected or authorized. For sensitive data, affirmative choice (opt in) must be given if the data is to be disclosed to a third party or used for a purpose other than its original purpose or the purpose authorized.

Onward Transfer (to Third Parties): Iris Data Services, LLC may transfer information to a third party acting as an agent for Iris Data Services, LLC such as an outside benefits administrator, by making sure that the third party enters into an agreement with Iris Data Services, LLC in which the third party promises to provide the same level of protection as required by the Safe Harbor Principles.

Security: Iris Data Services, LLC takes reasonable precautions to protect personal data from loss, misuse and unauthorized access, disclosure, alteration and destruction. These precautions include password protections for online information systems and restricted access to personal data processed by the Human Resources Department.

Data Integrity: Iris Data Services, LLC takes reasonable steps to ensure that personal data is accurate, complete and current. All Iris Data Services employees are asked to inform Iris Data Services, LLC’s corporate headquarters immediately in the event of changes in personal information.

Access: Upon request, data subjects may access personal information about them, and are able to have inaccurate information corrected.

Enforcement: Data subjects may contact Iris Data Services, LLC’s corporate headquarters in Fairview, Texas in order to register complaints, access requests or any other issues arising under the Safe Harbor Principles. In addition, Iris Data Services, LLC self-certifies annually with the U.S. Department of Commerce as a data controller, and the U.S. Federal Trade Commission has been empowered to investigate complaints and to obtain redress for individuals in case of the Iris Data Services, LLC’s non-compliance with the Safe Harbor Principles.

Verification: Iris Data Services, LLC conducts an annual self-assessment in order to verify that this Policy on Data Protection and Privacy of Personal Information is published and implemented within the Company and that it conforms to the Safe Harbor Principles.

IX. Processing Confidentiality And Security

The Owner must implement appropriate technical and organizational measures to protect personal data against accidental or unlawful destruction, accidental loss, unauthorized alteration, and unauthorized disclosure or access. These measures must be consistent with the standards and procedures issued by the Information Security department.

Transfers of private information to another country, no matter what technology is employed, must not take place unless prior approval of the Information Security manager has been obtained. An exception is made in those cases where the individual is, was, or will be located in the destination country, or when the individual has specifically requested such a transfer.

Iris Data Services, LLC information systems or staff must not link anonymous information about individual behavior or activities with personally-identifiable information unless the involved individuals have given their consent. For example, such a linkage could tie Internet shopping purchase information with web browsing logs.

The Owner or his or her designated representative must prepare a documented risk assessment to determine the privacy implications of all significantly new or different uses of personal data. Such a risk assessment must be completed before these uses take place, and must include all steps in the proposed processing, including access, storage, transmission, and destruction. Such a risk assessment must include not only consideration of the risks, but also the security measures to be employed such as access controls, encryption, logs, data retention schedules, and data destruction procedures.

When building, testing, enhancing, and maintaining processing systems, developers must not use actual personal data. Instead, they must use fictional or sanitized personal data that preserves the essential characteristics of the data, but that does not relate to identifiable individuals. In emergency situations where processing with actual personal data is required, use of such information is permitted under strict security procedures defined by Information Security.

All user access to processing systems and networks containing personal data must be logged so that every recent access to personal data can be traced to a specific user. Custodians of these systems and networks are responsible for the routine monitoring of such logs and the follow-up on potential security-relevant events.

When not in use, personal data must be stored in encrypted form if held in a computer or network, or in locked or similarly secured containers if held in paper, microfiche, or other non-computerized form. When sent over public computer networks such as the Internet, personal data must be protected by encryption. Procedures and standards issued by Information Security provide additional details on these topics.

When they are no longer needed, all copies of personal data, including those on backup tapes, must be irreversibly destroyed according to standards and procedures defined by the Information Security department. A document describing the personal data destroyed

and the reasons for such destruction must be prepared for each destruction process, and promptly submitted to the relevant Owner. Permission to destroy personal data may be granted by only the Owner, and only if all legal retention requirements and related business purposes have been met.

The use of cookies, web bugs, images, and other techniques to covertly gather information about individuals who use the Internet is incompatible with this policy. Whenever Iris Data Services, LLC gathers information about individuals, these same subjects must have agreed upon the collection effort in advance. For this same reason, Iris Data Services, LLC does not deposit cookie files on individual hard drives or does not perform any other covert recording of the Internet activity in which individuals have engaged.

Iris Data Services, LLC streamlines and expedites all of its computerized business interactions with individuals, but at the same time to be forthright and clear about its privacy policies. To support these objectives and to encourage individuals to use Internet commerce sites and other computerized business systems, Iris Data Services, LLC adopts and supports all generally-accepted standards for web content rating, web site privacy protection, and Internet commerce security, including third-party seals of approval.

Iris Data Services, LLC does not use externally-meaningful identifiers as its own internal individual account numbers. For example, to prevent identity theft, Iris Data Services, LLC customer account numbers must never be equivalent to social security numbers, driver's license numbers, or any other identifier that might be used in an unauthorized fashion by a third party.

X. Monitoring Of Internal Activities

In general terms, Iris Data Services, LLC does not engage in blanket monitoring of internal communications. It does, however, reserve the right at any time to monitor, access, retrieve, read, or disclose internal communications when a legitimate business need exists that cannot be satisfied by other means, the involved individual is unavailable and timing is critical to a business activity, there is reasonable cause to suspect criminal activity or policy violation, or monitoring is required by law, regulation, or third-party agreement.

At any time, Iris Data Services, LLC may log web sites visited, files downloaded, and related information exchanges over the Internet. Iris Data Services, LLC may record the numbers dialed for telephone calls placed through its telephone systems. Department managers may receive reports detailing the usage of these and other internal information systems, and are responsible for determining that such usage is both reasonable and business-related.

All files and messages stored on Iris Data Services, LLC processing systems are routinely backed up to tape, disk, and other storage media. This means that information stored on Iris Data Services, LLC information processing systems, even if a worker has specifically

deleted it, is often recoverable and may be examined at a later date by system administrators and others designated by management.

At any time and without prior notice, Iris Data Services, LLC management reserves the right to examine archived electronic mail, personal computer file directories, hard disk drive files, and other information stored on Iris Data Services, LLC information processing systems. This information may include personal data. Such examinations are typically performed to assure compliance with internal policies, support the performance of internal investigations, and assist with the management of Iris Data Services, LLC information processing systems.