



## **Privacy Policy**

## Revision History

<b>Revision #</b>	<b>Date</b>	<b>Author</b>	<b>Sections Altered</b>
Rev 1.0	2/15/15	Ben Price	New Document
Rev 1.1	7/24/15	Ben Price	Verify Privacy grid requirements are met
Rev 1.2	09/01/17	Stephanie Singh	Reviewed for Accuracy
Rev 1.3	10/19/17	Brad Carlton	Updated points of contact
Rev 1.4	06/01/18	Brad Carlton	Removed outdated provision
Rev 1.5	9/28/18	Brad Carlton/ Jill Peden	Privacy Shield
Rev 1.6	07/30/19	Brad Beeler-Carlton	Updated last name
Rev 1.7	08/23/19	Jill Peden	Updated Use of Cookie

## **Purpose**

This policy describes the standardized practices and procedures for the protection of personal information by L & D Mail Masters, Inc.

## **Scope**

This privacy policy relates to the following:

- L & D Mail Masters, Inc.'s websites
- Services provided through L & D Mail Masters, Inc.'s websites
- Websites not owned by, but which have a license by L & D Mail Masters, Inc.

This privacy policy applies to information we collect:

- On [www.ldmailmasters.com](http://www.ldmailmasters.com)
- In email, text, and other electronic messages between you and our websites
- When you fill out our contact forms or applications
- Websites not owned by, but which have a license by L & D Mail Masters, Inc.

This privacy policy does not apply to information collected by:

- Data that is collected offline
- L & D Mail Masters, Inc. employees
- Other businesses or legal entities

L & D Mail Masters, Inc. will only collect personally identifiable data, such as name, address, telephone number, email address, etc., when it is voluntarily submitted to us at a website or for granting access to one of our business applications (and only if it is required) by the client host. This information will be collected through an online form for that application, or via a transmission method in accordance with L & D Mail Masters, Inc.'s policies.

## **Privacy Statement**

L & D Mail Masters, Inc. respects the privacy of visitors to our online websites. The nature of our websites minimizes the amount of personal information required to use our services, however, private information is *not* required to use the general features of our websites.

Any personal information gathered on websites through the features offered will be kept strictly confidential and will only be used in ways for which you have specifically consented. We do not sell, lend, or rent any personal information collected from you to any third party. We take special care to protect the privacy and security of your information.

Because L & D Mail Masters, Inc.'s website is geared towards a B2B (business to business) model and not individual consumers, some business applications are offered through it. In order to use some of those business features you must first complete a registration form that will require you to give contact information (such as name and email address). We use this information to grant you access to that business application. In most cases you will only be asked for a user ID and password, as issued by L & D Mail Masters, Inc.

## **Your Use of the Website Implies Your Consent**

Your use of L & D Mail Masters, Inc.'s websites or services signifies your acceptance of this privacy policy. If you do not agree or are not comfortable with this policy, your remedies are to discontinue use of said websites.

## **Testimonials**

We post customer testimonials on our websites which may contain personally, identifiable information such as the customer's name. We obtain the customer's consent prior to posting such testimonial.

## **Public Website Privacy Statement**

If you are a visitor to an L & D Mail Masters, Inc. website that can be accessed without a password (our "public website") we refer to you as a "public website visitor."

This section describes how L & D Mail Masters, Inc. uses and disseminates information collected about public website visitors through [www.ldmailmasters.com](http://www.ldmailmasters.com). It does not cover any other data processing activities.

## **Use of Cookies**

We use cookies and various traffic tracking technologies to monitor the use of our public websites. We collect such data related to Internet Protocol ("IP") addresses, browser type, and cookies, but do not link it to any personally identifiable information (such as names and email addresses) that you may submit to us through other means.

A "cookie" is a small text file containing information that a web browser transfers to your computer's hard disk for record-keeping purposes. On our public websites, we may use cookies to analyze our site traffic patterns. We may also use cookies to "enhance User experience." Users may choose to set their web browser to refuse cookies, or to alert you when cookies are being sent. If they do so, note that some parts of the website may not function properly.

## **How we use Collected Information**

We may collect Information

- To improve customer service. Information you provide helps us respond to your customer service requests and support needs more efficiently.
- To identify users
- Remember user's custom preferences and help complete tasks without having to re-enter information when browsing from one page to another or when visiting the site later.
- Personalize user experience. We may use information in the aggregate to understand how our Users as a group use the service and resources provided on our Site.
- To improve our Site. We may use feedback you provide to improve our product and services.
- To process payments. WE do not share this information with outside parties except to the extent necessary to provide the service.
- To run a promotion, contest, survey or other Site feature.
- To send Users information they agreed to receive about topics we think will be of interest to them.
- To send periodic emails. We may use the email address to send User information and updates pertaining to their order. It may also be used to respond to their inquiries, questions, and/ or other requests. If User decides to opt-in to our mailing list, they will receive emails that may include company news, updates, related product or service information, etc. If at any time the User would like to unsubscribe from receiving future emails, we include detailed unsubscribe instruction at the bottom of each email or User may contact us via our Site.

## **User Privacy Statement**

A “user” means any individual who has access through the use of a password to an L & D Mail Masters, Inc. website, including buyers of L & D Mail Masters, Inc.’s services, participants of programs provided through an L & D Mail Masters, Inc. website, employees, clients and suppliers.

### **Buyers of Services for our Clients**

If you are a user acting as a Buyer of Services, we will only use your personal information for the purposes of:

- Providing L & D Mail Masters, Inc. services
- Facilitating communications between you and third parties
- Marketing activities
- Payments or other financial arrangements made by you for L & D Mail Masters, Inc. services

L & D Mail Masters, Inc. does not resell or transfer your e-mail addresses or any other personal information to third parties without your explicit permission.

You have a right to access personal information about you that L & D Mail Masters, Inc. holds. You have the right to correct, amend, or delete that information when it is inaccurate (except when the burden or expense of providing access would be disproportionate to the risks to your privacy, or when the rights of other persons would be violated.) It is your responsibility to update personal information as necessary

Registering to use L & D Mail Masters, Inc. services requires you to give us some contact information (like your name, phone number, street and e-mail address.) We will use this contact information to send you information about our systems and L & D Mail Masters, Inc. Your contact information is also used to contact you when necessary (for example, following up on a request from you for technical support.)

### **Participants of Programs Hosted by Clients**

If you are a participant using L & D Mail Masters, Inc.’s services to register for a program hosted by a client, the following terms are applicable to you:

- Your personal and other pertinent information will be collected when you register for a program on an L & D Mail Masters, Inc. website. Any information that you provide will be stored on a system managed by L & D Mail Masters, Inc.
- The information you provide is the property of the clients to whom you have provided the information. The client is regarded as the Data Controller.
- All such personal information is completely accessible to the respective client and its agents. Each L & D Mail Masters, Inc. client has its own privacy statement. By providing your personal information to L & D Mail Masters, Inc. for use by a client or a supplier (e.g. to make reservations with a particular hotel, or order an award to be shipped to your home address) you consent to L & D Mail Masters, Inc. providing a copy of your personal information to that client or supplier for collection, processing and any further transfer in accordance with the privacy statement (if any) of that client or supplier. L & D Mail Masters, Inc. is not responsible for any actions of clients or suppliers.

## **Communications**

L & D Mail Masters, Inc.'s clients may use various methods for allowing you to choose to receive or cease receiving messages, depending upon the individual client's needs and the requirements for each specific program. Clients may include in their registration website a question about not receiving messages, use an unsubscribe email reply option, or use other means in which removal from the invitee or participant list is an option. L & D Mail Masters, Inc. does not sell or distribute data to any third party (other than to the applicable clients and Suppliers) except as authorized under this policy.

## **Privacy Practices**

Your privacy is important to us. We describe in this policy our practices for collecting, maintaining, protecting, and disclosing data collected by using L & D Mail Masters, Inc.'s services, including L & D Mail Masters, Inc.'s platform and the website at [www.ldmailmasters.com](http://www.ldmailmasters.com). If you are one of our customers, you should read this policy.

## **Security of Data**

The security of your personal information is important to us. When you enter sensitive information on our registration or order forms, we encrypt that information using secure socket layer technology (SSL.) To learn more about SSL, go to [http://en.wikipedia.org/wiki/Secure\\_Sockets\\_Layer](http://en.wikipedia.org/wiki/Secure_Sockets_Layer). When we store your information in databases or in flat files, we utilize encryption technologies to ensure extremely high levels of data protection.

We follow generally accepted industry standards to protect personal information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, however, is 100% secure. Therefore, while we use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

## **Privacy Shield and International Transfer**

### **Swiss-U.S. Privacy Shield**

L & D Mail Masters, Inc. participates in and has certified their compliance with the Swiss-U.S. Privacy Shield Framework L & D Mail Masters, Inc. is committed to subjecting all personal data received from Switzerland, in reliance on the Privacy Shield Framework, to the Framework's applicable Principles. To learn more about the Privacy Shield Framework, visit the U.S. Department of Commerce's [Privacy Shield List](#).

L & D Mail Masters, Inc. is responsible for processing of personal data it receives, under the Privacy Shield Framework, and subsequently transfers to a third party acting as an agent on its behalf. L & D Mail Masers complies with the Privacy Shield Principles for all onward transfers of personal data from Switzerland, including the outward transfer liability provisions.

With respect to personal data received or transferred pursuant to the Privacy Shield Framework, L & D Mail Masters, Inc. is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, L & D Mail Masters, Inc. may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Under certain conditions, more fully described on the Privacy Shield website, <https://www.privacyshield.gov>, you may invoke binding arbitration when other dispute resolutions procedures have been exhausted.

## **EU-U.S. Privacy Shield**

L & D Mail Masters, Inc. participates in and have certified their compliance with the EU-U.S. Privacy Shield Framework. L & D Mail Masters, Inc. is committed to subjecting all personal data received from the European Union (EU) member countries, in reliance on the Privacy Shield Framework, to the Framework's applicable Principles. To learn more about the Privacy Shield Framework, visit the U.S. Department of Commerce's Privacy Shield List.

L & D Mail Masters, Inc. is responsible for the processing of personal data it receives, under the Privacy Shield Framework, and subsequently transfers to a third party acting as an agent of its behalf. L & D Mail Masters, Inc. complies with the Privacy Shield Principles for all onward transfers of personal data from the EU, including the onward transfer liability provisions.

With Respect to personal data received or transferred pursuant to the Privacy Shield Framework L & D Mail Masters, Inc. is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, L & D Mail Masters, Inc. may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Under certain conditions, more fully described on the Privacy Shield website <https://www.privacyshield.gov>, you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

## **Privacy Incident and Breach Management**

We have implemented a formal, comprehensive privacy incident and breach management program, which specifies the following:

- Incidents and breaches are reported to a member of our security team, who assesses if it is privacy or security related, classifies the severity of the incident, initiates required actions, and determines the required involvement by individuals who are responsible for privacy and security.
- The manager responsible for privacy issues and security has the overall accountability for the program and is supported by the privacy and security steering committee(s) and assisted by our security team. Incidents and breaches that do not involve personal information are the responsibility of the same manager.
- We have a privacy breach notification policy in order to deliver notices in a timely and legal fashion. We are prepared to manage a notification process internally, however, if needed we are prepared to engage third parties as necessary to assist with a notification process.
- Our program includes a clear escalation path, based on the type or severity, or both, of the incident, up to executive management, and as needed, legal counsel.
- Our program sets forth a process for contacting law enforcement, regulatory, or other authorities when necessary.
- Program training for new hires and team members, and awareness training for general staff, is conducted annually, when a significant change in the program is implemented, and will be conducted if any major incident occurs.

Our privacy incident and breach management program also specifies the following:

- After any major privacy incident, a formal incident evaluation is conducted by internal audit or outside consultants.
- A quarterly review of actual incidents is conducted and required program updates are identified based on:
  - Incident root cause
  - Incident patterns
  - Changes in the internal control environment.
- Results of the quarterly review are reported to our privacy steering committee and annually to the audit committee.
- Key metrics are defined, tracked and reported to senior management on a quarterly basis. The program is tested at least every six months and shortly after the implementation of significant system or procedural changes.

### **Privacy Risk Assessment**

In accordance with L & D Mail Masters, Inc.'s Risk Assessment Policy, we will conduct periodic reviews of the personal information data we store, collect and transmit to determine the possible risk associated the data and the processes surrounding that data.

Risk assessments on personal and private data will also be conducted on any new and significantly changed products, services, business processes, and infrastructure.

### **Retention Policy**

We will retain personal information only as long as necessary to fulfill the purposes set forth in this policy, or for a period specifically required by law or regulation and thereafter will be disposed of securely or made anonymous so that it cannot be identified to any individual.

L & D Mail Masters, Inc. specific retention policy is set at two years. After two years, all data that is not currently in use as part of an active program will be destroyed.

### **Changes Related to Privacy**

We have ongoing processes in place to monitor, assess, and address the effect on privacy requirements from various changes, including but not necessarily limited to changes related to legal and regulatory environments, industry standards, contracts with third parties, business operations and processes, people assigned responsibility for privacy and security matters, and technology.

### **Laws and Regulations**

L & D Mail Masters, Inc. will involve legal counsel to ensure that we are meeting the laws and regulations set forth in this policy. They will determine which privacy laws and regulations are applicable in the jurisdictions in which the L & D Mail Masters, Inc. operates. They will also perform annual reviews the entity's privacy policies and procedures to ensure they are consistent with the applicable laws, regulations, and appropriate standards.

### **Enforcement**



Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment. Employees may also be held personally liable for problems created due to any violation of this policy.

In the event that any information covered herein is compromised, or otherwise used inappropriately, L & D Mail Masters, Inc. employs an Incident Management Policy which is used to react to any given use or misuse of personal information by a third party.

### **Distribution**

This security policy should be distributed to all employees upon new employee orientation. At that time they will sign a formal document stating that they have read the policy and will comply with the standards set in the policy. This document will be stored in their personal HR file.

We will hold an annual, mandatory company meeting, to review all changes within the privacy policy and how it relates to the various job descriptions within the company. At each meeting, employees will sign stating they have read the privacy policy and will comply with the standards of the policy. This document will be stored by Human Resources and kept for 3 years.

### **Changes to Our Privacy Policy**

We reserve the right to modify this privacy statement at any time, so please review it frequently. If we make material changes to this policy or use of your personal information, we will notify you within this Privacy Policy and by means of notification on our home page, your program website, another appropriate place or by email.

### **How You Can Contact Us**

If you have questions or concerns regarding this Privacy Statement, please contact us by using one of the following options:

- E-mail
  - [bcarlton@ldmailmasters.com](mailto:bcarlton@ldmailmasters.com)
- Mail
  - Brad Beeler-Carlton  
L & D Mail Masters, Inc.  
110 Security Parkway  
New Albany, IN 47150

L & D Mail Masters, Inc. will respond to personal information change requests within 30 days of receiving such requests.