



Privacy Policy

## Revision History

<b>Revision #</b>	<b>Date</b>	<b>Author</b>	<b>Sections Altered</b>
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Rev 1.1	7/24/15	Ben Price	Verify Privacy grid requirements are met
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## Overview

L&D Mail Masters respects the privacy of visitors to our online sites. The nature of our site minimizes the amount of personal information required to use our services and it should be noted that private information is *not* required to use the general features of our website.

Because L&D Mail Masters' 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 User ID and password, as issued by L&D Mail Masters.

Any personal information gathered on this site 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.

## Purpose

You can contact L&D Mail Masters, Inc. regarding privacy matters via surface mail at:

Brad Carlton  
Systems Administrator  
L&D Mail Masters, Inc.  
110 Security Pkwy  
New Albany, IN 47150

## Scope

L&D Mail Masters will only collect personally identifiable data, such as name, address, telephone number, email address, social security number, 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 policies.

## External Policy

### Introduction

Your privacy is important to us. We are L&D Mail Masters, Inc. ("L&D Mail Masters" or "we" or "us"). We post this privacy statement (the "Privacy Statement") so that you are aware of the information we collect, how it is handled and with whom it is shared.

This Privacy Statement relates to the following websites: [www.LDMailMasters.com](http://www.LDMailMasters.com) and services provided through L&D Mail Masters Websites or L&D Mail Masters-Powered Websites (collectively the "L&D Mail Masters Services"). An "L&D Mail Masters-Powered Website" means a website not owned by L&D Mail Masters, but which has a license from L&D Mail Masters to utilize certain L&D Mail Masters technologies. A "User" means any individual who has access through the use of a password to an L&D Mail Masters Website or L&D Mail Masters-Powered Website, including buyers of L&D Mail Masters Services, participants of programs provided through an L&D Mail Masters Website or L&D Mail Masters-Powered Website, and employees and agents of corporate clients and Suppliers.

### Your Use of the Website Implies Your Consent

Your use of L&D Mail Masters Websites or Services signifies your acceptance of this Privacy Statement. If you do not agree or are not comfortable with any policy described in this Privacy Statement, your remedies are to discontinue your use of the relevant website or to follow instructions described elsewhere in this Privacy Statement.

### Changes in this Privacy Statement

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.

### Testimonials

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

### Security of Data

The security of your personal information is important to us. When you enter sensitive information (such as credit card or social security numbers) 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.

## Retention Policy

We will retain personal information only as long as necessary to fulfill the purposes set forth in this Privacy Statement, 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' specific retention policy is set at three years. After three years, all data that is not currently in use as part of an active program will be destroyed.

## Privacy Incident and Breach Management

We have implemented a formal, comprehensive privacy incident and breach management program, which specifies the following: (a) Incidents and breaches are reported to a member of our breach team. (b) 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). (c) We have a privacy breach notification policy in order to deliver notices in a timely and legal fashion. (d) Our program includes a clear escalation path. (e) Our program sets forth a process for contacting law enforcement, regulatory, or other authorities when necessary.

If you feel there has been an incident or breach please contact us at 1-812-981-7161 or email Brad Carlton, Systems Administrator, bcarlton@ldmailmasters.com.

## 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.

## Categories of Who Is Covered in this Privacy Statement

- If you are a visitor to the portions of L&D Mail Masters Websites or an L&D Mail Masters-Powered Website that can be accessed without a password (our "Public Website"), please see the section "Public Website Privacy" with respect to data about you. We refer to you as a "Public Website Visitor".
- If you are a User, please see the section "User Privacy" below for information on our data processing practices with respect to data about you.
- If you are a User or Public Website Visitor, and are a resident of any European Union member state, please also see the section "EU Safe Harbor Privacy Statement" with respect to data about you in reference to the EU Safe Harbor Principles. We refer to data relating to you as an identifiable individual as "EU Personal Data."

## What Is Not Covered in this Privacy Statement

We cover only our data processing practices described in this Privacy Statement. Without limitation, this Privacy Statement does not cover data that we collect offline, on businesses or legal entities or on our employees.

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.

#### How You Can Contact Us

If you have questions or concerns regarding this Privacy Statement, you should first contact us by email at [bcarlton@ldmailmasters.com](mailto:bcarlton@ldmailmasters.com). You can also write to us at Attention:

Brad Carlton, Systems Administrator, L&D Mail Masters Inc., 110 Security Parkway, New Albany, IN 47150, USA. L&D Mail Masters will respond to personal information change requests within 30 days of receiving such requests.

## Overview of L&D Mail Masters Services

### Suppliers of Services to Corporate Clients

L&D Mail Masters provides access to its applications via L&D Mail Masters Websites and L&D Mail Masters-Powered Websites to suppliers of services to corporate clients (“Suppliers”). These Suppliers include travel and event reservation services, and merchandise fulfillment suppliers.

### Buyers of Services for Corporate Clients

Individuals and companies (“Buyers”) use L&D Mail Masters’ technology via L&D Mail Masters Websites or L&D Mail Masters-Powered Websites on behalf of corporate clients to manage incentive programs, and to purchase services for these programs from Suppliers.

### Qualification of Employees

All employees of L & D Mail Masters, Inc. pass qualification screenings for their position before hire, and are queried against the OIG Exclusion list at the time of hire, and every month. These prerequisites and continuing checks against the OIG exclusion list make sure that the employees who interface with private data are qualified to do so.

### Participants of Programs Hosted by Corporate Clients

Participants (generally corporate client employees or stakeholders) use L&D Mail Masters’ Services when invited or registered by a corporate client to participate in a program. They do so by viewing an L&D Mail Masters-Powered Website that contains questions created by the corporate client. By responding to these questions, the participant gives the corporate client information about the participants’ activities relevant for participating in that specific program.

## Public Website Privacy Statement

This section describes how L&D Mail Masters uses and disseminates information collected about Public Website Visitors through our Public Website; it does not cover any other data processing activities. We Won't Collect Any Information about Public Website Visitors.

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.



## Use of Cookies.

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 the Public Websites, we may use cookies to analyze our site traffic patterns, but, except as described above, we link cookies only to IP addresses and not any personally identifiable information about Public Website Visitors.

## User Privacy Statement

### Buyers of Services for Corporate Clients

If you are a User acting as a Buyer of Services, the following terms are applicable to you:

#### General Information

- We will only use your personal information for the purposes of [(a) providing L&D Mail Masters Services; (b) facilitating communications between you and third parties; (c) our marketing activities; and (d) all credit and other financial checks in relation to any payments made by you for L&D Mail Masters Services]. L&D Mail Masters does not resell or transfer your e-mail addresses or any other personal information to third parties without your explicit permission or as allowed by law.
- The corporate clients are expected to ensure all information related to Users are collected and processed in accordance with the European legislation regarding data protection or in accordance with the European Union - United States Safe Harbor Principles. Corporate clients have informed L&D Mail Masters that Users have given their explicit consent to have their sensitive data processed. L&D Mail Masters may provide analysis and reports based on aggregated User data to other third parties as a natural course of doing business. These reports and analysis of aggregated data will not include individual User information or company names.
- You have a right to access personal information about you that L&D Mail Masters 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 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.

Your contact information is also used to contact you when necessary (for example, following up on a request from you for technical support).

- You can update your records in the L&D Mail Masters system by accessing the user information administration feature in the system or by sending an email to [bcarlton@ldmailmasters.com](mailto:bcarlton@ldmailmasters.com). You can also write to us at Attention: Brad Carlton, Systems Administrator, L&D Mail Masters Inc., 110 Security Parkway, New Albany, IN 47150, USA.

#### Communications

You may choose to receive special offers and other messages from L&D Mail Masters or its partners. You may, however, also choose to cease receiving such messages by updating your profile or sending an e-mail to [bcarlton@ldmailmasters.com](mailto:bcarlton@ldmailmasters.com) to change information previously provided, remove your information from our database, cancel any future communications or to

cancel our service. You can also write to us at Attention: Brad Carlton, Systems Administrator, L&D Mail Masters Inc., 110 Security Parkway, New Albany, IN 47150, USA.

### Participants of Programs Hosted by Corporate Clients

If you are a participant using L&D Mail Masters Services to register for a program hosted by a corporate client, the following terms are applicable to you:

#### General Information

- Your personal information and other pertinent information will be collected when you register for a program on an [L&D Mail Masters-Powered Website [or] L&D Mail Masters Website]. Any information that you provide will be stored on a system managed by L&D Mail Masters.
- The information you provide is the property of the corporate clients to whom you have provided the information. The corporate client is regarded as the Data Controller.
- All such personal information is completely accessible to the respective corporate client and its agents. Each L&D Mail Masters corporate client has its own privacy statement. By providing your personal information to L&D Mail Masters for use by a corporate 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 providing a copy of your personal information to that corporate client or Supplier for collection, processing and any further transfer in accordance with the privacy statement (if any) of that corporate client or Supplier. L&D Mail Masters is not responsible for any actions of corporate clients or Suppliers.

#### Communications

L&D Mail Masters corporate clients may use various methods for allowing you to choose to receive or cease receiving messages, depending upon the individual corporate client's needs and the requirements for each specific program. Corporate clients may include in their registration web site 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 does not sell or distribute data to any third party (other than to the applicable corporate clients and Suppliers) except as authorized under this policy.

## EU & EU Swiss Safe Harbor Privacy Statement

### General Information

This section describes how L&D Mail Masters collects, uses, and discloses EU Personal Data, which is certain personally identifiable information that L&D Mail Masters receives in the United States about individuals resident in the European Union (the "EU"). It supplements and supersedes any similar provision above, but only with regards to individuals resident in the European Union. L&D Mail Masters complies with the US-EU Safe Harbor Privacy Principles and the US – Swiss Safe Harbor Privacy Principles as set forth by the U.S. Department of Commerce ("the Principles"), with respect to the collection, use, and retention of data from the EU.

L&D Mail Masters complies with the US-EU Safe Harbor Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries. L&D Mail Masters has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view our certification page, please visit <http://www.export.gov/safeharbor> L&D Mail Masters has further committed

to refer unresolved privacy complaints under the US-EU Safe Harbor Principles to an independent dispute resolution mechanism, the BBB EU SAFE HARBOR, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed by L&D Mail Masters please visit the BBB EU SAFE HARBOR web site at <http://www.bbb.org/us/safe-harbor-complaints> for more information and to file a complaint.

#### Definitions used in this EU Safe Harbor Privacy Statement

“Adequate” or “adequacy” has the meaning ascribed in the EU Directive on Data Processing 95/46/EC.

“Data Controller” means the controller who transfers Personal Data as defined by the EU Directive on Data Processing 95/46/EC

"Personal Data" means data that is (a) transferred to the United States from the EU, (b) is about, or relates to, an identified or identifiable individual, (c) can be linked to that individual, and (d) is recorded. Personal data may include, among other things, an individual's name, address, phone number, e-mail address, social security or national health insurance or an equivalent number. For further clarity, the term "Personal Data" does not include data that pertains to a specific individual, but from which that individual cannot reasonably be identified. Unless otherwise indicated, references herein to Personal Data include sensitive Personal Data (as defined below).

"Sensitive Personal Data" means data that is a subset of Personal Data that indicates an individual's medical or health condition, racial or ethnic origin, political opinions, religion, union membership, sexual orientation, or actual or alleged criminal activity.

#### Notice

L&D Mail Masters collects Personal Data from and about individuals via L&D Mail Masters Websites and L&D Mail Masters-Powered Websites for the purposes of [(a) providing L&D Mail Masters Services; (b) facilitating communications between you and third parties; (c) our marketing activities; and (d) all credit and other financial checks in relation to any payments made by them for L&D Mail Masters Services]. Any complaints or questions should be first sent to us by email at [bcarlton@ldmailmasters.com](mailto:bcarlton@ldmailmasters.com). Users can also write to us at Attention: Brad Carlton, IR Director, L&D Mail Masters Inc., 110 Security Parkway, New Albany, IN 47150, USA.

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

When L&D Mail Masters receives Personal Data from the EU merely for processing purposes in the United States and does not control the collection of the Personal Data, L&D Mail Masters may not provide notification of this EU Safe Harbor Privacy Statement to the Users to which such Personal Data relates. In such event, L&D Mail Masters reserves the right to process Personal Data in the course of providing L&D Mail Masters Services to Buyers, Suppliers or other of its clients or otherwise for L&D Mail Masters' operation of its business without the knowledge of the Users involved.

#### Choice

Except as provided below, L&D Mail Masters gives Users from whom it collects Personal Data the opportunity to choose not to allow L&D Mail Masters to disclose his or her Personal Data to a third party or to use it for a purpose incompatible with the purpose for which it was originally

collected (the “opt-out” rights). For Sensitive Personal Data, L&D Mail Masters requires such User to affirmatively choose to allow for the data to be disclosed to a third party or used for a purpose other than its original purpose (the “opt-in” choice).

Users desiring to exercise their opt-out rights should first contact us by email at

bcarlton@ldmailmasters.com. Users can also write to us at Attention: Brad Carlton, Systems Administrator, L&D Mail Masters Inc., 110 Security Parkway, New Albany, IN 47150, USA.

When L&D Mail Masters receives Personal Data merely for processing purposes in the United States and does not control the collection of the Personal Data, L&D Mail Masters may not provide such choices to the Users to whom such Personal Data relates.

#### Onward Transfer to Third Parties

L&D Mail Masters may disclose Personal Data to a third party if (a) L&D Mail Masters has received the applicable User's permission to make the disclosure, (b) the disclosure is necessary to meet national security, public interest, or law enforcement requirements, (c) allowed by a law that creates conflicting obligations for L&D Mail Masters or that explicitly authorizes disclosure (except that we will limit such disclosure to the extent necessary), or (d) the Principals allow for other exceptions provided that it is applied to other Users equally.

#### Security

L&D Mail Masters takes security measures designed to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. These measures include internal reviews of our data collection, storage and processing practices and security measures, as well as physical security measures designed to guard against unauthorized access to systems where we store Personal Data. L&D Mail Masters restricts access to Personal Data internally to L&D Mail Masters agents and partners who need to know that information in order to operate, develop or improve our services. These parties are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

#### Data Integrity

L&D Mail Masters takes reasonable steps to ensure that Personal Data is reliable, accurate, complete, current and relevant for the purposes for which it was collected.

#### Access

Consistent with any applicable client commitments, L&D Mail Masters will permit Users upon their request to access their Personal Data and correct any erroneous information.

The User may need to provide sufficient identifying information, such as name, address, birth date, and social security or national health insurance or an equivalent number. Such access may be denied or limited by L&D Mail Masters if providing such access is unreasonably burdensome, expensive under the circumstances, or if in giving such access would violate another person's rights. In some circumstances, L&D Mail Masters may charge a reasonable fee for access to Personal Data. Users can contact L&D Mail Masters at bcarlton@ldmailmasters.com to request access to change personal information.

## Enforcement

L&D Mail Masters will conduct an annual self-assessment to ensure that this Statement is published and disseminated within L&D Mail Masters and on its website and that it conforms to the Principles. In addition, L&D Mail Masters has deployed internal processes to monitor L&D Mail Masters' compliance with the Principles and to address all questions or complaints. L&D Mail Masters will also self-certify annually with the U.S. Department of Commerce as being in compliance with the Principles. [L&D Mail Masters participates in Better Business Bureau's (the "Independent Monitor") EU Safe Harbor Seal Program, which verifies our compliance with the Principles.] In compliance with the US-EU Safe Harbor Principles, L&D Mail Masters commits to resolve complaints about your privacy and our collection or use of your personal information. European Union or Swiss citizens with inquiries or complaints regarding this privacy policy should first contact L&D Mail Masters at [bcarlton@ldmailmasters.com](mailto:bcarlton@ldmailmasters.com). Users can also write to us at Attention: Brad Carlton, Systems Administrator, L&D Mail Masters Inc., 110 Security Parkway, New Albany, IN 47150, USA. If a User raises such a concern or complaint, L&D Mail Masters will investigate the matter and attempt to resolve all issues to the satisfaction of the individual raising the concern or complaint.

L&D Mail Masters has further committed to refer unresolved privacy complaints under the US-EU and US-Swiss Safe Harbor Principles to an independent dispute resolution mechanism, the BBB EU SAFE HARBOR, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed by L&D Mail Masters, please visit the BBB EU SAFE HARBOR web site at <http://www.bbb.org/us/safe-harbor-complaints> for more information and to file a complaint.

## What If You Do Not Get A Satisfactory Response?

We will try our best to see that you will always get a satisfactory response from us. As part of this effort, we also offer you recourse to contact the Independent Monitor, an independent, nonprofit organization dedicated to enabling individuals and organizations to establish trusting relationships based on respect for personal identity and information in the evolving networked world. L&D Mail Masters is a licensee of the Independent Monitor Privacy Program. If Users do not get a satisfactory response from us and have to use Independent Monitor, then the Independent Monitor will have the ability to sanction us under our agreement with them. These sanctions include the possibility of publicly disclosing our violations, deletion of data from our system, injunctive orders and suspension from participation in the U.S. Safe Harbor program. Additionally, if we fail to comply with the sanctions imposed on us by Better Business Bureau, then we would fall under the jurisdiction of the U.S. Federal Trade Commission Act for possible deceptive trade actions.

This EU Safe Harbor Privacy Statement covers the L&D Mail Masters Websites. The Independent Monitor's certification covers the gathering and dissemination of information described in this EU Safe Harbor Privacy Statement, but not any of our other data processing practices.

## Privacy Incident and Breach Management

We have implemented a formal, comprehensive privacy incident and breach management program, which specifies the following: (a) Incidents and breaches are reported to a member of our breach team, who assesses if it is privacy or security related, or both, classifies the severity of the incident, initiates required actions, and determines the required involvement by individuals who are responsible for privacy and security. (b) 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 breach team. Incidents and breaches that do not involve personal information are the responsibility of the same Manager. (c) 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. (d) 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. (e) Our program sets forth a process for contacting law enforcement, regulatory, or other authorities when necessary. (f) 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: (a) After any major privacy incident, a formal incident evaluation is conducted by internal audit or outside consultants. (b) A quarterly review of actual incidents is conducted and required program updates are identified based on (i) incident root cause; (ii) incident patterns; and (iii) changes in the internal control environment. (d) Results of the quarterly review are reported to our privacy steering committee and annually to the audit committee. (e) 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' 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.

## Laws and Regulations

L&D Mail Masters 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 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.

## 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 to the standards set in the policy. This document will be stored in their personal HR file.

We will hold an annual mandatory all 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 again sign stating they have read the privacy policy and will comply with the standards of the policy. This document will be stored by the Systems Administrator and kept for 3 years.

The changes made in this document will also be communicated to the users of the system shortly after the approval of this document by way of an update on their website. This notification will occur anytime a change to the above policy is made and will include when the information collected is to be used for a purpose not previously specified.