

# Privacy Policy

## **Privacy Commitment**

Infotex, Inc. is dedicated to protecting your privacy and providing you with the highest level of service. As technology continues to transform the way information is collected and distributed, we want you to know that we have implemented important procedures and practices designed to safeguard the privacy and security of financial information about you.

- We employ safeguards to protect information about our clients and to prevent fraud.
- We do not provide information about clients to other companies for their own marketing purposes.
- For your protection, we do not sell or share your personal information.

## **How We Protect Information About You**

Protecting your information is an essential part of our service to you. As such,

- We train our employees to protect customer information.
- We continually enhance our security tools and processes.
- We perform a thorough background screening on all new hires as well as any persons given access to information classified as Confidential and/or Critical by the Infotex Data Ownership Policy.
- We have a Business Continuity Plan in place as per our firm's Risk Management Policy. It is tested and reviewed in December of each year by the Business Continuity Planning Team and is updated at that time. It includes a Disaster Recovery Plan, Data Protection Plan, and DRP Testing Plan.
- All data resides in a hardened data center which has passed a successful SAS70 audit. All remote access is encrypted at strength levels surpassing Best Practices. When finished viewing, data is cleaned off the employee's workstation. Thus, no data remains on employee workstations unless approved in advance by Data Owners as per Infotex, Inc.'s Data Ownership Policy, which includes a robust record destruction procedure.
- By policy, no client data is stored on workstations. However, during consulting engagements which require on-site work, there may be times that data must be transferred to laptops. Most on-site work is performed by connecting back to our SAS70 protected data center via a terminal services connection. If these arrangements can be made, no data is transferred to the laptop. In the event we do work off laptops during on-site consulting, as a mitigating control all laptops are encrypted. We also have strict policies regarding the storage of laptops during transportation.

## **Information Access Restriction**

We restrict access to non-public information about you to only those employees that need to know that information to provide products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your non-public personal information.

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## **Information We Collect**

“Non-public personal information” is information about you that we obtain in connection with providing a product or service. We may collect non-public personal information about you from the following sources:

- Information that you provide to us;
- Information about your services with us, your affiliates or others; or,
- Information collected during the course of providing a service or product.

We do not collect ANY of your customers’ non-public information without informing you in advance. The only service which we currently provide that requires us to collect limited NPI is our semi-blind Pretext Calling service. Upon termination of projects related this service, we destroy all collected NPI by shredding hard copies and wiping it from our network drive using GPG.

## **Information We Disclose**

With limited exceptions like those below, we do not provide client information to companies or others outside of Infotex, Inc. You do not need to request this confidentiality; it is our standard practice.

In order to serve your needs, we may provide all of the information we gather to:

- Comply with a legally permitted inquiry by a government agency or regulator.
- Others as permitted or required by law (such as to protect against fraud or in response to a subpoena).

## **Disclosure of Privacy Policy**

At the time of establishing a relationship with a client, and not less than annually during the continuation of such relationship, Infotex, Inc. shall provide a clear and conspicuous disclosure to such client, in writing or in electronic format or other form permitted by regulations.

## **Disclosure of Security Breaches**

In the unfortunate event that there is a breach of security which would affect the privacy, confidentiality, or integrity of data which belongs to you, we will inform you of that breach verbally as soon as the breach is discovered, and via a written follow-up memorandum after post-mortem investigation is complete.