



## Privacy Policy

### 1.0 Overview

This policy will establish that certain information, both internal to ICS Corporation as well as that belonging to the clients to whom ICS Corporation engages, is to remain confidential to the business of ICS Corporation and to its clients.

### 2.0 Purpose

To make clear to ICS employees the information that is to remain Private and Confidential and not to be shared except with those other employees who have a need to know.

### 3.0 Scope

This policy applies to all employees of ICS Corporation.

### 4.0 Policy

The protection of confidential business information and trade secrets is vital to the interests and success of ICS Corporation. ICS Corporation abides by all federal and state regulations concerning the handling, storage and transmission of consumer data, including The Gramm-Leach Bliley Act, the CAN-SPAM Act, and the California Consumer Protection Act.

Confidential information includes, but is not limited to the following:

#### 4.1 Information Collection:

In the course of providing Direct Mail services, we collect and process Personal Information that is provided to us by our clients, including PII. This information may include names, postal addresses, email addresses, and other contact information.

We also collect information about the recipient's preferences and interests in order to provide targeted and relevant communications.

Our clients are responsible for ensuring that they have obtained all necessary consents and permissions to provide this information to us for the purpose of carrying out Direct Mail services.

- Client provided artwork
- Compensation Data

- Computer Processes
- Computer Programs and Codes
- Customer Lists
- Customer Preferences
- Client Provided Data Files
- Financial Information
- Marketing Strategies
- Pending Projects and Proposals
- Proprietary Production Processes
- Research and Development Strategies
- Technological Data
- Any file containing Personally Identifiable Information or Personal Health Information

Employees who are exposed to confidential information may be required to sign a non-disclosure agreement as a condition of employment. Employees who improperly use or disclose trade secrets or confidential business information will be subject to disciplinary action, up to and including termination of employment and legal action, even if they do not benefit from the disclosed information.

#### **4.2 Information Use:**

We use the Personal Information collected for the purpose of carrying out Direct Mail services on behalf of our clients, including sending promotional materials, advertisements, and other communications to individuals.

We will not use the information for any other purpose unless we have obtained specific consent from our clients or from the individuals themselves.

#### **4.3 Information Sharing and Disclosure:**

We do not sell, rent, reuse or otherwise disclose Personal Information to third parties, except as required by law or as necessary to provide our services.

We may share Personal Information with third-party service providers that perform services on our behalf, such as mailing houses or email service providers. These third-party service providers are bound by contract to: (a) protect the confidentiality and security of the Personal Information; and (b) to use it only for the purpose of providing the services.

We may also share Personal Information as required by law, for example, in response to a court order or subpoena.

#### **4.4 Information Security:**

We have implemented measures to protect Personal Information from accidental loss and from unauthorized access, use, disclosure, alteration, or destruction. We regularly review and update these measures to ensure that they are adequate and effective. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information.

## 5.0 Reporting

Any employee of ICS shall report any suspicion of a breach of this Privacy Policy to the Privacy Officer. The Privacy Officer will submit a Privacy Incident Form to the CEO.

## 6.0 Enforcement

This policy will be enforced by the Compliance Officer and/or Chief Executive Officer. Violations may result in disciplinary action, which may include suspension, or more severe penalties up to and including termination of employment.

## Policy Review

### Revision History

Revision Date	Approved By	Changes
April 27, 2020		Issue Date
May 20, 2021		-Designated Compliance Officer as Privacy Officer -Added language about reporting of Privacy Incident
May 2 <sup>nd</sup> , 2022	Compliance Committee	Updated Logo, formatted document, added footer, added section 6.0
April 24, 2023	Compliance Committee	Added language to cover client provided data, notate various specific regulations, and sections on Information Collection, Use, Sharing and Disclosure, and Information Security to align with our publicly facing Privacy Policy.
May 18 <sup>th</sup> , 2023	Compliance Committee	Annual Review, no changes
April 29 <sup>th</sup> , 2024	Compliance Committee	Annual Review, no changes
April 25 <sup>th</sup> , 2025	Compliance Committee	4.3 – added language regarding reusing data
May 22 <sup>nd</sup> , 2025	Compliance Committee	Annual Review, no changes