



PRIVACY POLICY NOTICE

Effective: August 1, 2019

At The Sourcing Group (“TSG”), we place a high priority on maintaining the privacy and confidentiality of our customer’s personal information. In order to provide our services to you, we may collect, use and transfer personal information. This notice intends to help you understand our commitment to protecting this information at all times. We are providing this information to describe the information that we may process, and the situations where we may disclose that information to another party. Any questions or comments may be addressed to any member of our senior leadership team at 646-572-7520.

The Sourcing Group also participates in the EU-US Privacy Shield Program. The list of participating entities can be viewed online at <https://www.privacyshield.gov/list>. As part of our commitment, TSG will only disclose information to third parties directly involved in fulfillment activities for purposes of completing the transaction. We will only collect the minimum required information and will not disclose any of such to non-interested third parties for any purpose. The identities of authorized third parties will vary depending upon the material being ordered or manufactured but will be limited to authorized branded apparel manufacturers and printers as certified by TSG to deliver to the locations within the EU. This program is subject to oversight and enforcement by the US Department of Commerce

INFORMATION WE COLLECT

TSG will process our customer’s information for purposes of printing and mailing documents which may or may not contain personally identifiable information as described by the HIPAA standards. We may store certain aspects of this information on a short term basis for purposes of reporting, reconciling, or augmenting the data as part of our standard service offering to our clients. We may keep and present on a temporary basis, composed documents for viewing by authorized representatives of our customers for purposes of review and approval to release the printed output into the mail. In the process of doing so we may have information specific to a medical service or condition of a person and their family, association with providers, financial standing, enrollment status, and other documents as mandated by city, state, and federal authorities. As a print broker, we may enter into contractual relationships with print shops that we will transmit this data to for actual processing. These shops are held to the same exacting standards and agreement that we commit to our customers. All of this information is only collected and used on an as needed basis for the business benefit of our customers and their constituents.

HOW WE PROTECT YOUR INFORMATION

In accordance with applicable laws and corporate policies, TSG has a responsibility to protect the privacy of all our customer’s information. We maintain security standards and processes including physical, electronic and procedural safeguards to ensure that any access to personal information is on a need-to-know basis and limited to authorized employees or designees in the performance of fulfillment services which we are contracted for. Some of the procedures we implement are limiting unnecessary printing of documents containing personal information, utilizing secure file transfers mechanism, routine and frequent vulnerability assessments, encryption of any transactional data or output, utilizing locked



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cabinets for storage of records, and document shredders for proper destruction and disposal of such items when they are no longer needed. We also guard against malicious and unauthorized access by utilizing secure websites as certified by recognized Internet security authorities for our applications, and obtaining and maintaining proper digital certificates to indicate such.

WHO MAY RECEIVE YOUR INFORMATION

By entering into a Business Associate Agreement with our clients, we are authorized to use and disclose under the appropriate policies and supervision, any personal information required to provide the fulfillment services we provide. We do not and will not resell any of this information, or provide to a third party for any purposes, unless instructed by our customer in writing to do so. Any and all parties who may see any portion of this information may only do so if it is needed for the performance and quality assurance of their provided function. Any such use will ensure the minimum amount of information is displayed and to perform the function. Any information beyond a name and mailing address that is needed will be encode in such a way as to be illegible to the human eye (e.g. barcodes). Such parties may consist of digital print centers and their supporting staff of QA, Indexers, print operators and inserter operators, offset printers and their staff, mail expeditors, and USPS Postal employees.

DISCLOSURES

TSG is bound by Service Level Agreements, and full transparency to our customers, to disclose any accidental disclosure of personal information that runs counter to the stated goals of this policy. Any disclosure notification will be followed up by a root cause analysis within three days or as defined by an SLA with the customer, whichever is more restrictive.

REMEDIATION

Accidental disclosures may occur due to bad data feeds, malfunctioning equipment or faults in programming logic. These can occur at the customer site, or at the print factory. Regardless, of whether a customer believes that they were at fault or whether TSG and its authorized representatives were, TSG will always engage in a root cause analysis for purposes of developing a remediation strategy to avoid the scenario in the future. This is our commitment to our customers for providing a quality service.

TSG RESERVES THE RIGHT AT ANY TIME TO MODIFY THIS DOCUMENT IN ANY WAY TO INCOPROATE OR REMOVE PROVISIONS AS DEEMED NECESSARY TO COMPLY WITH APPLICABLE LAWS, AND TO MAINTAIN A POLICY WHOSE INTENT IS TO OFFER THE BEST OF BREED IN MAINTENANCE OF PRIVACY.