

Image Processing Systems, Inc.

Safe Harbor Policy

Introduction

Image Processing Systems, Inc. ("IPS") is a leading provider of document scanning, indexing, conversion, and archiving services for organizations large and small, in a wide variety of industries. We work with applications ranging from human resources and accounts payable to contracts and government records. Our document scanning services transform information recorded on paper, micrographics and other media into an almost endless variety of digital formats on a wide range of media, including ImageServ™ our own Web-based document repository.

Protecting consumer privacy is important to IPS. IPS (hereinafter collectively referred to as "Company," "we," "us" or "our") complies with the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. IPS 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, please visit <http://www.export.gov/safeharbor/>

This privacy policy outlines our general policy and practices for implementing the Principles, including the types of information we gather, how we use it and the notice and choice affected individuals have regarding our use of and their ability to correct that information. This privacy policy applies to all personal information received by the Company whether in electronic, paper or verbal format.

Definitions

"Personal Information" or "Information" means information that (1) is transferred from the EU or Switzerland to the United States; (2) is recorded in any form; (3) is about, or pertains to a specific individual; and (4) can be linked to that individual.

"Sensitive Personal Information" means personal information that reveals race, ethnic origin, sexual orientation, political opinions, religious or philosophical beliefs, trade union membership or that concerns an individual's health.

Principles

Notice

Under most circumstances, IPS does not collect Personal Information directly from individuals, but may receive that information from our corporate clients. Therefore, when IPS receives Personal Information from the EU or Switzerland (and other locations) for processing purposes, and does not directly control the collection of the Information, IPS does not typically provide notification to those individuals. However, IPS is usually mandated by our client to hold that Information in the strictest confidence. In those cases, IPS reserves the right to process Personal Information in the course of providing services to our client without the knowledge of the individual(s) involved. IPS never uses the Information for a purpose other than it was provided to the Company.

The above notwithstanding, Personal Information captured and contained in the IPS servers and databases is never sold, licensed or distributed to any third parties except to vendors and suppliers for the purposes of processing the data on behalf of our clients.

When specifically requested to do so, IPS will inform affected individuals about the purposes for which it receives and uses Personal Information about them, how to contact the Company with

any inquiries or complaints, the types of third parties to which it may disclose the Information, and any choices that IPS may offer individuals for limiting the Information's use and disclosure.

Choice

Since IPS does not collect Personal Information directly from individuals, we do not offer an opportunity to choose (opt out) whether their Personal Information is (1) to be disclosed to a third party or (2) to be used for a purpose other than the purpose for which it was originally collected.

Onward Transfers

IPS will only transfer Personal Information to third parties where we have Non-disclosure Agreements or other contracts in place, and where they have given assurances that they provide at least the same level of privacy protection as required by these Principles. Where IPS has knowledge that a contracted third party is using or sharing Personal Information in a way that is contrary to the Principles, IPS will take reasonable steps to prevent or stop such processing.

Access

IPS processes Information under the guidance and direction of our corporate clients. Where appropriate, and with written permission from our corporate clients, IPS will grant individuals reasonable access to correct, amend or delete inaccurate information, except where the burden or expense of providing access would be disproportionate to the risks to the privacy of the individual in the case in question or where the rights of persons other than the individual would be violated.

Data Security

IPS shall take reasonable steps to protect the Information from loss, misuse and unauthorized access, disclosure, alteration and unwanted destruction. IPS has put in place appropriate physical, electronic and managerial procedures to safeguard and secure the Information from loss, misuse, unauthorized access or disclosure, alteration or unwanted destruction. IPS cannot guarantee the security of Information on or transmitted via the Internet.

Data Integrity

IPS shall only process Personal Information in a way that is compatible with and relevant for the purpose for which it was collected or authorized by our corporate client. To the extent necessary for those purposes, Company shall take reasonable steps to ensure that Personal Information is accurate, complete, current and reliable for its intended use.

Enforcement

IPS uses a self-assessment approach to assure compliance with this privacy policy and periodically verifies that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented and accessible and in conformity with the Principles. We will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of Personal Information in accordance with the Principles.

If a complaint or dispute cannot be resolved through our internal process, we agree to dispute resolution using an independent resource mechanism as a third party resolution provider.

Amendments

This privacy policy may be amended from time to time consistent with the requirements of the Safe Harbor. We will post any revised policy on our main website: <http://www.ipsservices.com>.

Information Subject to Other Policies

The Company is committed to following the Principles for all Personal Information within the scope of the Safe Harbor Agreement. However, certain information is subject to policies of the Company that may differ in some respects from the general policies set forth in this privacy policy.

Contact Information

Questions, comments or complaints regarding the Company's Safe Harbor Policy or data collection and processing practices can be mailed or emailed to:

Image Processing Systems, Inc.
Attn: Legal Department/Safe Harbor
150 Meadowland Parkway
Secaucus, NJ 07094
info@ipsmailbox.com

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