

DATA TRANSMISSION PROCEDURE

Suttle-Straus, Inc. (“Suttle-Straus” or “Company”) has established the following procedures with regard to the handling of “Customer Business Records” including electronic files, data, mailing lists and/or other forms of records provided by customers to Suttle-Straus. Suttle-Straus will use Customer Business Records as directed by the customer and for the business purposes for which it was intended, and does not share Customer Business Records with any other entity for any purpose, except as required by law.

POLICIES AND STANDARDS

1. Customer supplied data files will remain at all times the sole property of the Customer.
2. Suttle-Straus will not add customer records to any in-house list or files by using names, addresses, or other information, whether specified or inferred, obtained from supplied customer data files.
3. Suttle-Straus will not use the supplied customer data files for any purpose other than in connection with the particular job for which the files were supplied.
4. Customer data may only be viewed on authorized company owned computers.
5. Computers or other data storage devices that contain customer data may not be removed from the Company premises.
6. Information furnished through customer files shall be considered confidential, shall not be communicated to other employees except on a pre-approved basis, and shall not be used for any purpose except in connection with the specific job for which it was supplied.
7. Any printed material containing confidential information from Customer data files, which is not mailed, will be shredded or otherwise destroyed in a manner which will prevent reconstruction.
8. Emailed data files to addresses other than efiles@suttle-straus.com will be deleted immediately after receipt. No data files will be accepted at Suttle-Straus via any email accounts other than efiles@suttle-straus.com.

PROCEDURE FOR RECEIVING AND HANDLING CUSTOMER DATA FILES

1. “Customer Business Records” should be preferably encrypted, submitted and transmitted to Suttle-Straus, Inc. via FTP.
 - a. Suttle-Straus will provide customers with a secure log in to the Suttle-Straus FTP site.
 - b. Suttle-Straus also has the ability to retrieve customer data from a provided FTP site.
 - c. All files received via the Suttle-Straus FTP site will be deleted from the site immediately after they are downloaded.
 - d. In the event that a customer is unable to transmit files via FTP, they may be sent via (preferably encrypted) email to efiles@suttle-straus.com.
2. Data files will only reside on the password-protected Data Processing server. Data files will not reside on any server or workstation outside of Data Processing.
3. Data files will not be copied to a local workstation.
4. Only pre-approved personnel may have access to Data Processing server and workstations.