

# **PRIVACY, COMPUTER USAGE, AND E-MAIL POLICY**

## **Use for Business Purposes/Company Access, Review**

The Company provides communication systems (including internet telephones, electronic mail, instant messaging and other systems). These assets are referred to collectively as "Company assets." These Company assets are provided to employees at the Company's expense to assist you in carrying out company business. An employee may only use Company assets, and the Company information accessible through their use, for purposes authorized by the Company in connection with the employee's job duties.

The Company assets belong to the Company and the Company reserves the right (at any time and without notice) to access, inspect, inventory, or search any Company asset. Items or information of a personal nature may be discovered in the course of any such exercise of the Company's rights if you use the Company assets for personal purposes. You consent to such access by accepting and using the Company assets.

The Company's e-mail, instant messaging, text messaging, Internet messaging and electronic bulletin board systems are to be used for business related purposes and only to transmit and receive business information. The Company treats all messages sent, received or stored in its e-mail, instant messaging, text messaging, Internet messaging and electronic bulletin board systems as business messages.

The Company has the capability to access, review, copy and delete any messages sent, received or stored on the e-mail system, on other Company computer, electronic and Internet resources, and on the message recording and storage systems of Company-issued cell phones and PDAs. The Company reserves the right to access, review, copy or delete all such messages or to search any Company Assets for any purpose and to disclose them to any party (inside or outside the Company) it deems appropriate. By using the Company assets, you agree that you have no reasonable expectation of privacy in relation to such usage or any items or information stored in the Company assets.

Should employees make incidental use of the e-mail, instant messaging, text messaging, Internet messaging or electronic bulletin board systems, or of Company-issued cell phones or PDAs to transmit or receive personal messages, such messages will be treated no differently than other messages, i.e., the Company reserves the right to access, review, copy, delete or disclose them for any purpose. Accordingly, employees should not use the computer or the e-mail system, or any other Company-owned or Company-issued electronic device (including voice and text message storage and retrieval systems), to send, receive or store any messages that they wish to keep private. Users should treat the computer and the e-mail, instant messaging, text messaging, Internet messaging and electronic bulletin board systems, and the message storage and retrieval functions of the Company's cell phones, voice mail systems and PDAs, like a shared file system - with the expectation that messages sent, received or stored in the system (including individual hard disks, chips and other memory storage devices) will be available for review by any authorized representative of the Company for any purpose.

Use of the e-mail system to copy and/or transmit any documents, software, or other information protected by copyright laws is prohibited and will result in disciplinary action.

The Company treats all voice mail and electronic messages received or stored in Company-issued systems as business messages in which employees have no expectation of privacy.

# **PRIVACY, COMPUTER USAGE, AND E-MAIL POLICY**

To use electronic communication tools effectively, employees should follow these guidelines:

- Emails and IMs are not a substitute for oral communication. If you have a matter of importance to discuss, do so via telephone.
- Emails and IMs are to be limited to work related matters, and business etiquette is to be utilized in drafting messages.
- Announcing late arrivals or early departures over IM is not a substitute for proper approvals. Please follow Company attendance policies.
- Network security procedures are to be followed at all times.
- Never open attachments from an unknown source and always make sure anti-virus software is running and virus definitions are up to date.
- Do not send confidential, proprietary, or trade secret information via IM.
- Do not send emails or IM under another employee's login ID.
- Off-color humor, foul, inappropriate, offensive or discriminatory language and harassment of any kind are prohibited.

Email is not to be used to communicate with Debtors. All written correspondence to Debtors is to be by preformatted; attorney approved SIF & PIF letters and sent via Fax or US Mail. If email is absolutely required, management may choose to protect and send such information direct.

Improper use of email or IM may result in discipline up to and including discharge.

## **COPYRIGHT INFORMATION**

Use of the e-mail system to copy and/or transmit any documents, software, or other information protected by copyright laws is prohibited.

## **OTHER PROHIBITED USES**

The Company prohibits use of the e-mail system or the Company computer system to engage in any communications that are in violation of company policies, including but not limited to transmission of defamatory, obscene, offensive or harassing messages, or messages that disclose personal information about other individuals without authorization.

## **INTERNET ACCESS**

Employees are urged to use their common sense and judgment. If an employee uses Company equipment for personal business, including email, cell phones, smart phones, internet access, etc, there is no right to privacy and any information transmitted, including personal information, may be reviewed by the Company.

The Company recognizes that many employees may use the internet for personal reasons away from work to create or participate in a blog, wiki, online social network or any other form of online publishing or discussion. The Company does not discourage off work usage of the internet for these purposes. However, pursuing these activities during work hours or on Company equipment, computers or hand held devices violates Company policy unless directed to do so in the course of your duties.

In connection with an employee's use of social media, blogs, forums, etc, the following conduct is prohibited whether performed with Company equipment and on Company time or with personal equipment and on personal time.

# **PRIVACY, COMPUTER USAGE, AND E-MAIL POLICY**

1. Making false and defamatory comments about the Company including its management, products or services or comments which disclose Company trade secrets or confidential proprietary information.
2. Making discriminatory, disparaging, defamatory or harassing comments or otherwise engaging in any conduct prohibited by the Company's Anti-Harassment policy.
3. Publishing content to any website outside of the Company having something to do with the work you do or subjects associated with the Company, without using a disclaimer such as this: "The postings on this site are my own and don't necessarily represent the Company's positions, strategies or opinions."
4. Making an endorsement of the Company, or its products or services, on any social media, e.g. blog, forum, or social networking site, even if using a personal account, unless the employee discloses his/her relationship with the Company.

The Company does not intend to regulate personal use of social networking in non-work hours. It is in the Company's interest—and, we believe, that of each employee while not at work—to be aware of the following parameters when engaging in social networking activities:

1. Know and follow the Company's Business Conduct and Use of Company Property for Business Purposes policy guidelines.
2. Identify yourself—name and, when work related, your role with the Company—when you discuss Company-related matters. When applicable, you must make it clear that you are speaking for yourself and not on behalf of the Company.
3. Follow copyright, fair, use and financial disclosure laws.
4. Don't provide the Company's or another's confidential, medical, or other proprietary information. Conversations that are meant to be private or related to internal Company matters should not be published online.
5. Don't cite or reference clients, partners, or suppliers without their approval. When you do make a reference, where possible link back to the source.
6. Be aware of your association with the Company in online social networks. If you identify yourself as an employee of the Company, ensure your profile and related content is consistent with how you wish to present yourself with colleagues and clients.

Also, keep in mind the following guidelines:

1. Employees are personally responsible for the content they publish on blogs, wikis, or any other form of user-generated media. Be mindful that what you publish will be public for a long time—protect your privacy.
2. Don't pick fights with other people online. If you are in error, be the first to correct your own mistakes. Online fights can escalate easily and cause damage to friendships and, potentially, work relationships.
3. Respect your audience. Don't use ethnic slurs, personal insults, obscenity, or engage in any conduct that would not be acceptable in the Company's workplace. You should also show proper consideration for others' privacy and for topics that may be considered objectionable or inflammatory—such as politics and religion.

Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

This policy does not prohibit and will not be enforced in any manner which could interfere with, restrain, or coerce employees from engaging in concerted activities including the right to discuss terms and conditions of employment.

# **PRIVACY, COMPUTER USAGE, AND E-MAIL POLICY**

Any questions regarding this policy should be directed to your supervisor or the human resource office.

## **OFF-SITE POLICY FOR COMPUTER/TECHNICAL ISSUES**

In the event of computer issues that affect a user's ability to adequately complete your job duties, they are responsible for notifying their immediate supervisor and [desktopsupport@dandsltd.com](mailto:desktopsupport@dandsltd.com). The support team will correct any issues related to company provided systems. If deemed necessary when using a non-company issued device, the user will be expected to have recommended repairs made or purchase new equipment and/or software. Any equipment issued to a user must be returned in the same condition as it was received. Users may be asked to work at an alternate location while waiting for technical resolutions; all remote employees should have alternate work venues available for short term use.

## **SCREEN DOCUMENTATION POLICY**

It is forbidden to enter notes into the D&S, Ltd. asset that are unprofessional. Profanity will never be tolerated. Sound judgment must be used when documenting the results of any communication. Regardless of position or duty, each employee is required to document all work and/or communication notes. Each account must represent all work and communications. If an employee encounters an internal problem with another employee, that employee should meet with management for resolution. The computer notes screen is never a place to vent frustrations concerning clients, debtors, or co-workers. No derogatory comments should be entered into the company notes. Record only the facts. Never use opinion.

## **ADVERSE POLICY IMPACT**

The Company has implemented numerous policies that are designed to achieve important business objectives. We recognize, however, that an otherwise legitimate workplace policy can have unintended consequences to individuals in a particular group or class. If you feel that one of our policies adversely impacts you due to your unique circumstances (e.g. your membership in one of the "protected classes"), you may seek accommodation regarding such policy. The procedure to seek this accommodation is as follows: Deliver to your supervisor (or your supervisor's supervisor) a memorandum, in writing, which identifies (1) the policy at issue; (2) the reason why the policy, as it applies to you, creates an adverse impact on you; and (3) the accommodation that you request to avoid this adverse impact.

Examples of "protected classes" include, but may not be limited to, race, color, creed, sex (including pregnancy), religion, marital status, age, national origin or ancestry, physical or mental disability, medical condition, genetic information, sickle cell trait, sexual orientation, or veteran status.

# **PRIVACY, COMPUTER USAGE, AND E-MAIL POLICY**

---

---

## **D&S, LTD. PRIVACY POLICY**

D&S, Ltd. recognizes the sensitive nature of the personal and business information supplied to us by our Clients, and we take precaution to protect the privacy of that information. When we entrust this information to anyone, we must be certain it will be used within our guidelines.

We are committed to having personal information and business information supplied to us by our Clients remains private and secure whether this information is supplied to any employee or a vendor of D&S, Ltd. While information is the cornerstone of our ability to provide superior service, our most important asset is our Clients' trust. Therefore, we have adopted this Privacy Policy. We have prepared this policy to explain what types of information we collect, how we use it, and under what circumstances we may share it. We demand that information we supply to a vendor or employee be used responsibly only to:

Provided D&S, Ltd. the specific services we have requested from a vendor. Perform the employment duties D&S, Ltd. assigns to an employee.

This policy covers all information, personal, business, financial, or otherwise supplied to us by our Clients which may include, but not be limited to, personally identifiable information about a debtor or a debtor's current or former relationship with the Client.

## **COLLECTION AND USE**

We limit the use of information we've received from our Clients to that which is necessary to provide Client Services, and to maintain and administer Client accounts. We demand our employees and vendors limit their use in a similar manner. Any misuse of Client information by an employee is grounds for immediate termination. Any misuse by a vendor will result in immediate termination of our relationship and possible pursuit of damages.

## **CONFIDENTIALITY**

We do not sell Client information. We will allow employees access to information when that access is necessary to maintain and service Client accounts, and perform other related activities. We demand that our employees understand the importance of confidentiality and customer privacy. Employees are educated on our requirements as part of the initial training. Employees are required to protect the confidentiality of all Client information. Even if employment is terminated, the former employee must continue to treat Client information in the same way as if they were still an employee.

Vendors shall receive only that specific information required to perform the contracted services. Vendors are required to protect the confidentiality of Client information and shall not use or disclose that information except as strictly necessary to perform services for D&S, Ltd. All Client information must remain confidential after the vendor relationship is terminated, and D&S, Ltd. may demand the return and/or destruction by the vendor of such information, and in the case of destruction, proof thereof.

Under no circumstances may Client information be used by an employee or vendor, directly or indirectly, for personal gain or any purpose other than the purpose for which it was supplied by D&S, Ltd. All Client information is the sole and exclusive property of the Client and under no circumstances shall an employee or vendor reproduce such information in any form.

# **PRIVACY, COMPUTER USAGE, AND E-MAIL POLICY**

---

---

## **DISPOSAL**

D&S, Ltd. requires that all paper information be burned and/or shredded. Electronic information must be properly deleted. Vendors and/or employees ascertain that he or she will delete all personally identifying information upon termination (voluntary or involuntary) from D&S, Ltd.

## **PEER-TO-PEER FILE SHARING NETWORKS**

Peer-to-Peer (P2P) file sharing networks are software applications that allow people to share music, videos, and other information over the internet. These programs allow access of stored files to anyone who joins the network and are unsecured. The FTC has ruled that the use of such sites with regards to consumer information violates the FTC Act (Safeguard Rule in Section 501(b) Gramm-Leach-Bailey Act) and the Privacy Rule (Section 503).

D & S, Ltd is committed to protecting the integrity of all client, debtor and internal information. Our employees are prohibited from setting up, operating, or utilizing any Peer-to-Peer(P2P) file sharing networks for the purposes of sharing any information concerning our clients, their customers, or proprietary D&S, Ltd materials. Anyone found non-compliant with this policy will face disciplinary action up to and including termination.

## **KEEPING UP-TO-DATE WITH OUR PRIVACY POLICY**

We will provide notice of our privacy policy annually as long as an individual maintains an ongoing relationship with us. We reserve the right to change this Privacy Policy at any time. We will advise of any changes. Our policy can be reviewed at any time by contacting human resources for a copy.