

## **IST Management Services, Inc. Privacy Shield-Compliant Privacy Policy Statement**

Innovative Service Technology Management Services, Inc. (d/b/a/ IST Management Services) participates in the Privacy Shield. The complete list of organizations participating in the Privacy Shield may be viewed via this link: <https://www.privacyshield.gov/list>.

IST is a Business Process Outsourcing (BPO) company which specializes in providing solutions for the management of physical and digital information through Facilities Management, eDiscovery and Electronic Document Management services.

IST Management Services complies with the EU-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information transferred from European Union to the United States. IST Management Services has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>.

The Federal Trade Commission, or FTC, has jurisdiction over IST Management Service's compliance with Privacy Shield.

IST Management Services collects data as is typically found in legal documents. Examples of such data include, but are not limited to:

Names	Physical Addresses	Birthdates
Social Security Numbers	Email Addresses	Drivers License Numbers
Passport Numbers	Taxpayer Identification Numbers	Alien Registration Numbers
Marriage Dates	Beneficiaries & Dependents	Medical Records & PHI

IST provides electronic discovery (also called e-discovery or eDiscovery) services that is a process in which electronic data is sought, located, secured, and searched with the intent of using it as evidence in a civil or criminal legal case. eDiscovery data is sent to IST from law firms or forensic data collection service companies for the expressed purpose of electronic analysis in a legal case. The data is ingested into IST's network, processed through an analytics engine, hosted on our servers, and presented securely to authorized users for classification and submission to the courts for the legal case in question. IST is unaware of the specific contents of the data, however, it is highly probable the data contains information of a personal nature and therefore prudent of IST to protect this data with the most stringent of security measures.

The finished product of the eDiscovery process is a case file, which is a consolidated collection of responsive documents. In several instances, our clients will request and authorize IST to send the case file that will be submitted to the court to opposing counsel, who would be considered a 3rd party. Disclosure of this information to opposing counsel is a standard practice in eDiscovery legal matters and is required by law. IST provides this as an added service to our customers and follows our strict security data transfer process of data encryption, key management, chain of custody, and notifications.

IST does not share or sell data with any other third party. If this practice should change in the future, we will update this policy accordingly to identify those third parties and provide individuals with an opt-in or opt-out choice as required by the Privacy Shield Framework.

Data related to the human resources functions of IST Management Services are also covered by this agreement. European Union Data Protection Authorities are the appropriate recourse mechanism for human resources data. Please visit [http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm) for more information.

We will provide an individual opt-out or opt-in choice to EU individuals before we share their data with third parties other than our agents, or before we use it for a purpose other than which it was originally collected or subsequently authorized.

To limit the use and disclosure of your personal information, please submit a written request to Mr. Daniel Blechinger (contact information below).

IST Management Services acknowledges that EU individuals have the right to access the personal information that we maintain about them. An EU individual who seeks access, or who seeks to correct amend, or delete inaccurate data should direct their query to Mr. Daniel Blechinger (contact information below). If requested to remove data, we will respond within a reasonable timeframe.

In compliance with the EU-US Privacy Shield Principles, IST Management Services commits to resolve complaints about your privacy and our collection or use of your personal information.

European Union individuals with inquiries or complaints regarding this privacy policy should first contact IST Management Services care of:

Mr. Daniel Blechinger  
Chief Information Officer  
IST Management  
Services 934 Glenwood  
Avenue SE Suite 250  
Atlanta, GA 30316  
404-582-8874

IST Management Services has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <http://www.bbb.org/EU-privacy-shield/for-eu-consumers> for more information and to file a complaint.

Where applicable to the employment relationship, IST agrees to cooperate and comply with the EEA (DPAs) regarding the unresolved complaints of employee of European-affiliated companies who are located in the EEA and Switzerland. Such employees may direct complaints about their personal information to their respective DPA. For the contact information for your country's DPA, please contact us at the address given below.

If your Privacy Shield complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See Privacy Shield Annex 1 at <https://www.privacyshield.gov/article?id=ANNEX-I->

[introduction.](#)

IST Management Services may be required to disclose personal information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements.

Pursuant to the Privacy Shield Framework, IST Management Services is liable in cases of onward transfer to agent third parties unless we can prove we were not a party to the events giving rise to the damages.