

PCF Privacy and Information Security Procedures Policy

Publishers Circulation Fulfillment, Inc. knows that your privacy is important to you, and we want you to know that it is important to us too. We created this Privacy and Information Security Procedures Policy (this "Policy") to explain the types of information Publishers Circulation Fulfillment, Inc. and its affiliates (referred to in this Policy as "PCF," "Company," "we," "us," "our" and similar pronouns) collect through our web sites on which it is posted and the various social networking platforms that we use (each, a "Site") and how we will use, disclose and handle this information once it is collected.

Please review this Policy carefully and check back to this page periodically to make sure you understand how your information will be treated. The Company reserves the right to change this Policy at any time, in which event we will let you know by posting the changed Policy on this page with a new "Effective Date." Changes will be effective immediately upon posting to the Site. By accessing the Site, you are indicating your agreement to this Policy. If you have any questions regarding this Policy, contact the Company at 502 Washington Avenue Suite 500 Towson, Maryland 21204.

If you are located outside of the United States, you should know that the information you provide to us is being transmitted to us and processed in the United States and will be protected subject to this Policy and United States laws, which may not be as protective as the laws in your country. Also, the Site places cookies and local shared objects on your computer or device which are further described below. By using the Site, you agree to this.

This Policy does not apply to information that you may provide to us, or that we may obtain, other than through the Site, such as over the phone, by mail, or in person.

In general, the information we collect about you is used for our business purposes and as described in this Policy, including to promote and improve the Site and our business, to contact you with answers to the questions you send to us via the Site, and to provide you with information regarding our products and services. For more information on this Policy, please read below.

OPT IN AND OPT OUT

You may have the right to opt in to or opt out of certain of our uses and disclosures of your personal information. For example, when you are asked to provide personal information on the Site, you may have the opportunity to elect to, or not to, receive certain messages from us by email. You may tell us that you do not want to receive our promotional messages or that you do not want us to share your personal information with third parties for their marketing purposes by sending us your name, address, e-mail and phone number using the information in the "How Do I Contact PCF?" section below. You may also have the opportunity to opt out of our promotional emails by clicking on the opt-out link within the email you receive. Please understand that it may take us a few days to process any opt-out

request and that even if you opt out of receiving promotional correspondence from us, we may still contact you in connection with your relationship, activities, transactions and communications with us. Also, to stop receiving promotional messages from third parties who already have your contact information, please contact them directly.

WHAT INFORMATION DOES PCF CAPTURE ABOUT VISITORS TO ITS SITE?

As is the case with many web sites, we and our servers automatically capture your IP address (which we may associate with your domain name or that of your Internet access provider) and certain “clickstream data” pertaining to your Site usage. Clickstream data includes, for example, date and time of your visit, referring address (web site from which you come to the Site), the pages, content or ads you see or click on during your visit and when and for how long you do so, items you download, the next web site you visit when you leave the Site, any search terms you have entered on the Site or a referring address, and information about your computer or device, Internet browser and operating system, and their settings.

DOES PCF COLLECT PERSONAL INFORMATION?

Yes. We collect personal information through several areas of the Site, such as the account registration and log-in, the job opportunity area, the Distribution Inquiry area, as well as through the Contact Us page. Personal information is information that can be used to identify you as an individual or allow someone to contact you, as well as information attributed with such information. We collect personal information such as your name; company name and title of your position; postal addresses; email addresses; telephone numbers; site browsing and transaction history; and job history and application information.

You may review, update or modify certain of the personal information that is stored in your user account on the Site (if applicable and if you have one) by logging in to the “My Account” or similar area of the Site. We may ask you to verify your identity and to provide other details before we are able to provide you with any information, correct any inaccuracies, or delete any information. Your right to access your information is subject to our records retention policies.

HOW DOES PCF USE AND DISCLOSE INFORMATION ABOUT YOU?

We and our service providers may use the information we collect from and about you to perform the business functions described in this Policy. For example, we use this information to help identify the type of web site content and services our customers value most; to improve, develop and administer the Site and our services; to contact you in response to your inquiry; and to send you marketing and other communications, including information about products, services, and events, of ours and of others, that we think might interest you. (You may opt out of receiving our promotional emails by following the instructions in the “Opt In and Opt Out” section above.) We also use and disclose this information for additional purposes disclosed when personal information is submitted to us or as required or permitted by law. Our policy is to not give, sell or otherwise distribute the information collected through the Site to any third party, except as described in this Policy or where necessary or permitted by law.

We may share your information with affiliates or third parties:

- who need your information in order to provide services to us (or on our behalf)

- for their marketing and other purposes (unless you tell us not to by following the instructions in the “Opt In and Opt Out” section above)
- when we believe in good faith that disclosure is necessary to protect our rights or property, respond to a government, judicial or other legal request, or comply with the law
- in connection with a corporate change or dissolution, including for example a merger, acquisition, reorganization, consolidation, bankruptcy, liquidation, sale of assets or wind down of business

For example, in order to respond to or resolve your service needs and to operate our business, we may provide your information to one of the publications we are contracted with to provide delivery logistic services or to one of our contracted independent businesses that provide your delivery services.

In the case of information submitted by job applicants, the Company uses the personal information obtained from registered users of the job opportunities areas of the Site only for job application purposes and in accordance with this Policy and the Application Submission and Privacy Policy available on the Site.

Aggregated, non-identifiable information is utilized for Site analytical purposes only, to monitor and understand such things as web traffic patterns, the number of visitors to the Site, pages visited and length of stay, Site entry and exit points, all of which are used to improve the quality and usefulness of the Site and our offerings. Log file data and other information gathered from users of the Site are used to improve customer experience.

DOES PCF USE COOKIES, PIXEL TAGS OR OTHER TRACKING TECHNOLOGIES?

We and our service providers may deploy various tracking technologies on the Site to collect additional information about your Site visits. For example,

- A cookie is a small file that is placed by the web server into the browser’s application folder on your computer at the request of a web site. It can contain attribute data needed by a web site for remembering your stored login information or your personal settings preferences. Once placed onto your machine, the cookie will allow the Site to “recognize” you as a unique individual.
- A pixel tag (also known as a “clear GIF” or “web beacon”) is a tiny image – typically just one-pixel – that can be placed on a web site or in our electronic communications to you in order to help us measure the effectiveness of our content by, for example, counting the number of individuals who visit us online or verifying whether you’ve opened one of our emails or seen one of our web pages.

The Site uses Google Analytics, a web analytics service provided by Google Inc. (Google). Google Analytics uses tracking technologies such as cookies and pixel tags to help the Site analyze how users use the Site. The information generated by the tracking technology about your use of the Site (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the Site, compiling reports on Site activity for the Company and providing other services relating to Site activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google’s behalf. **To opt out of your Site usage**

information being included in our Google analytics reports, you may follow these instructions at <https://tools.google.com/dlpage/gaoptout>.

Some web browsers may transmit do-not-track signals to the web sites with which the user communicates. Because of differences in how web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they even are aware of them. We currently do not change our tracking practices in response to do-not-track settings in your web browser.

Our third party partners, such as web analytics companies, collect information about your online activities over time and across the Site and other online properties. These third parties may not change their tracking practices in response to do-not-track settings in your web browser and we do not obligate these parties to honor do-not-track settings.

CAN COOKIES BE REMOVED FROM MY HARD DRIVE?

Yes, cookies can be removed from your hard drive. Also, depending on what type of web browser and what browser version you are using, you may be able to change the properties on your cookie file so that cookies are not used or saved. Please check with your browser provider for more information on removing cookies or visit <http://www.allaboutcookies.org/> to learn more about the use of cookies, including how to manage or delete them.

DOES PCF USE SOCIAL NETWORKING?

We maintain presence on several social networking and blogging platforms, such as Facebook, Twitter and LinkedIn, and we also incorporate some third party social networking features onto the Site. This Policy applies to our use of information you submit to us there, but it does not apply to what those third party platforms do with your information. Those platforms have their own privacy policies, and we encourage you to read them.

WHAT SECURITY MEASURES DOES PCF USE TO PROTECT MY PERSONAL INFORMATION?

While no web site can guarantee that any information, during transmission or through the Internet or while stored on our system or otherwise in our care, will absolutely be safe from intrusion by others, we have implemented administrative, technical, and physical security procedures designed to help protect the personal information you provide to us.

If you correspond with us by email or using web forms like a Contact Us feature on the Site, you should be aware that your transmission might not be secure. A third party could view the information you send in transit by such means. We will have no liability for disclosure of your information due to errors or unauthorized acts of third parties during or after transmission.

If you create an account on the Site (if applicable), you are responsible for maintaining the strict confidentiality of your account password, and you shall be responsible for any activity that occurs using your account credentials, whether or not you authorized such activity. Please notify us of any unauthorized use of your password or account or any other breach of security.

If at any time during or after our relationship we believe that the security of your personal information in our care may have been compromised, we may seek to notify you of that development. If a notification is appropriate, we will endeavor to notify you as promptly as possible under the circumstances. If we have your email address, we may notify you by email to the most recent email address you have provided us in your account profile. Please keep your email address in your account up to date. You can change that email address anytime in your account profile. If you receive a notice from us, you can print it to retain a copy of it. To receive these notices, you must check your email account using your computer or mobile device and email application software. **You consent to our use of email as a means of such notification. If you prefer for us to use the U.S. Postal Service to notify you in this situation, please contact us using the information in the section below.** You can make this election any time, and it will apply to notifications we make after a reasonable time thereafter for us to process your request. You may also use this email address to request a print copy, at no charge, of an electronic notice we have sent to you regarding a compromise of your personal information.

Additionally, PCF has administrative, technical, and physical security policies and procedures, including with respect to authorized access and use, designed to maintain the confidentiality of the personal information you provide.

HOW DO I CONTACT PCF?

Our postal address is:
Publishers Circulation Fulfillment, Inc.
502 Washington Avenue Suite 500
Towson, Maryland 21204

EFFECTIVE
April 2017