

Corporate Responsibility

Signatures has established procedures that monitor the electronic and non-electronic use of SPI within the facility. Signatures employees are exposed to SPI in ways of customer name and address, employee name, address, and email address.

A compliance officer has been assigned to monitor all electronic communications. Additionally, a stakeholder has been assigned to notify the compliance officer in the event that an action is noticed that is not permitted. The ways that electronic communications are monitored are the following

- Internal Email
- External Email
- Video Monitoring
- o Browser review
- o Telephone communication oversight
- Mobile device review and tracking

Employees that are not provided with a company paid mobile device are not permitted to retain SPI on their personal devices. Should an employee retain SPI on their personal mobile device, that employee is subject to disciplinary action and, possibly, legal action.

Standard postal mail is only permitted to be opened by three designated individuals:

- o CEO
- President
- o Controller

Signatures has established a way of documenting changes in privacy laws. Should a privacy law change and require internal notification of a policy change, a written a memo summarizing the changes and business impact of a new law will be distributed within 5 business days prior to the change of the policy.

Internal audits are documented with a detailed description of each area explaining why certain areas are out of compliance and the plan to bring them into compliance. After an area is brought in to compliance, it is documented and retained for validate the risk management.

Should a privacy-related issues or dispute occur, the compliance officer will handle all such issues, audits, and evaluations. After an audit occurs and results are found, the compliance officer will meet with the President and the Program Manager to address the issue or dispute and communicate that with the complainant.