

## Text (SMS) Messaging Program Privacy Policy

Innovative Employee Solutions, Inc. ("IES") is committed to protecting the privacy and security of your Personal Information. This privacy policy (the "Text Messaging Privacy Policy" or "Policy") governs how we treat the Personal Information that we collect and receive from you in connection with your use of the IES Text (SMS) Messaging Program ("Text Messaging Program" or "Program") which we make available to you through a third-party service provider. This Policy is incorporated into the Terms and Conditions of use of the Program.

We may modify this Policy at any time, and, therefore we urge you to frequently review it and check for updates. By subscribing to/opting-in to the IES Text Messaging Program, you are providing us with personally identifiable information, and you consent to our use of such information as described in this Policy.

### **What Information Do We Collect?**

We will collect your mobile phone number and other personally identifiable information that you voluntarily provide to us ("Personal Information") in order to participate in the Text Messaging Program, such as a user/screen name and any comments or feedback regarding the Program you may send us. **You are not required to participate in the Program in order to work for IES.**

### **How is Your Information Used and Shared?**

Personal Information is collected in order to participate in the Text Messaging Program pursuant to the specific Terms and Conditions (<https://www.innovativeemployeesolutions.com/employee-center/employment-policies/>) for the Text Messaging Program. IES may use your Personal Information for the following purposes: (a) to provide you with access to the Program, (b) to process and respond to inquiries, (c) to improve the Program services, (d) if necessary, to contact you with important announcements regarding your employment, and (e) to provide anonymous internal reporting. IES and its service provider may have access to your Personal Information and any information you enter through the text messaging service. IES may work with affiliated organizations to perform certain functions on our behalf, such as managing data or processing information. These third parties will have access to your Personal Information only to the extent necessary to perform these specific functions and may not use it for any other purpose. We may also share your Personal Information with your cell phone service provider or their partners and/or subcontractors.

In addition we may disclose your Personal Information to third parties to the extent we are required to do so by law in connection with any legal proceedings or prospective legal proceedings.

### **Privacy of Children**

IES does not knowingly collect Personal Information from children under the age of 13.

### **Links**

Mobile alerts may contain links to other sites on the Internet that are owned and operated by third parties. IES is not responsible for the collection or use of your information at any third party sites.

### **Security**

We have reasonable administrative, physical and technical measures, policies and procedures in place to protect the privacy, security and confidentiality of your Personal Information that we collect and

maintain. All Personal Information is stored on our secure servers, or that of our service providers, behind a firewall at a data center with strictly controlled access.

**How Do You Contact IES or Update Personal Information?**

If you have any questions or comments about this SMS Privacy Policy, or would like to update, deactivate or delete any Personal Information, please contact us:

Innovative Employee Solutions, Inc.  
9665 Granite Ridge Drive, Suite 420  
San Diego, CA 02123

Telephone: 1-800-433-0961  
FAX: 858-715-5110  
E-mail: [HRServiceRep@innovative-es.com](mailto:HRServiceRep@innovative-es.com)

We will retain your Personal Information for as long as your account is active or as needed to provide you with the services that you requested. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Effective Date: November 12, 2019