

EXHIBIT 21C

You've Got Mail:

The promise of cyber communication in prisons and need for regulation

ICSolutions - Privacy Policy

PRISON
POLICY INITIATIVE

PRIVACY POLICY

Effective January 5, 2013

We understand the importance of your personal information and have implemented this Privacy Policy to ensure we handle your information carefully. This Privacy Policy explains how we (or a third party service provider acting on our behalf) (collectively “we” or “Access Corrections”) collect, use and protect personal information related to your use of Access Corrections services. By using our website, contacting us via email, or contacting us via telephone, you are accepting the practices described in this Privacy Policy. If you do not consent to these practices, please do not use the Access Corrections services.

1. What Personal Information Do We Collect about You?

Information Related to Your Account and Purchase

We request that you provide a limited amount of personal information when you set up an account to send funds and messages to your loved ones through the Access Corrections website. For example, you give us your email address and password during the registration process; your name, postal address, telephone number, and credit card number during the payment process; and information related to the recipient such as name, correctional facility and inmate number.

Customer Service Communications

Our customer service department communicates with customers through email and Live Chat features. In order to effectively address our customers' questions and concerns, we may store email and Live Chat records. These records may include any personal information that you provide to us in the email or Live Chat.

2. What Non-Personal Information Do We Collect about You?

Information Automatically Collected

When you visit our website, our web server automatically collects your Internet protocol (IP) address, which is a number assigned to your computer when you connect to the Internet. Our web server may also be able to identify things like the type of web browser and operating system you use. We may collect this information for the purpose of system administration, to assess traffic to our website and to maintain the website. We can and will use IP addresses to identify a user when necessary to enforce compliance with the website [Terms and Conditions](#).

Use of Cookies

Cookies are small bits of information that are placed on a person's computer when that person accesses a website. We use cookies to analyze movement on the website, such as total visitors to the site and pages viewed, for fingerprinting, site security, and to make improvements to the site. Moreover, our website's partners may also use cookies in connection with the services and websites to which the Access Corrections website links. If you link to another site, you should review the applicable privacy policy. We do not save passwords or credit card information in cookies.

Most web browsers are initially set up to receive cookies. If you do not want to receive cookies, browsers usually have a “Help” or “Internet Tools” feature that will show you how to prevent your browser from accepting new cookies and how to delete cookies from your computer.

3. How is Personal Information Used?

Generally, our company collects personal information for the following purposes:

- To facilitate the transfer of funds and/or sending email to the recipients you've selected, including sharing that information with the facilities where the recipient is located.
- To provide detailed information on the status of your purchase.
- To contact you concerning your purchase, if necessary.
- To answer specific questions related to products and services offered through the Access Corrections website.
- To learn more about how visitors use the website and measure areas of interest, for the purpose of improving the site.
- To deliver customized content and advertising to you on the site, and on other sites.

4. How is Personal Information Stored and Secured?

We use reasonable physical, technical, and administrative safeguards and policy methods to protect your personal information.

It is also important that you take steps to maintain the secrecy of your account information and secure access to your computer. Always be sure to log out of your account when using a shared or public computer. And please note that Access Corrections will never ask you for your password in an unsolicited phone call or email, but may request them if you call us directly.

5. How is Personal Information Shared with Third Parties?

Generally, we share information related to your account and purchase in the following circumstances:

- We contract with Service Providers to provide the Access Corrections program. Your personal information may be disclosed to Service Providers to (1) process your transaction, (2) deliver your order, (3) support of your use of our website, (4) provide operational, marketing or advertising support, or (5) for other purposes to support our business. Service Providers are permitted to use your information only on our behalf. Additionally, the companies must satisfy our security and privacy requirements and agree to treat the information confidentially.
- We occasionally share limited customer information with companies that provide products we would like to offer. The companies must also satisfy our security and privacy requirements and agree to treat the information confidentially.
- We occasionally may subcontract or co-contract certain services, and your personal information may be disclosed to these parties. The companies must also satisfy our security and privacy requirements and agree to treat the information confidentially.
- A court order or other judicial or administrative process may require us to provide information to a government authority or party to a lawsuit. We will provide information that we believe in good faith is required to comply with the law, order or other process. We may also be required to disclose certain information in court documents if we have to bring an action against you, for example, to collect a debt owed to the company, or enforce our [Terms and Conditions](#).
- We may share some of your information with our parent company or affiliates in order to more effectively provide the Access Corrections service. In each case, we require our affiliates to honor this Privacy Policy.
- We share personally identifiable information with our jail and prison customers.

6. How to Access and Modify Your Personal Information?

If you want to modify your registration information, please login in to your account and make the necessary changes.

At the time of registration, you may be given a choice whether you want to receive information about new features, offers or other notices related to the Access Corrections program. When you register, you may opt to not receive these communications by clicking a box that affirmatively declines to receive such information. You also have the option to opt out at a later date by following the instructions in the communication that you receive from us.

7. Can Children Make Purchases Through Access Corrections?

This website is not directed to, nor do we knowingly collect personal information from, children under the age of 13. Children wishing to make purchases through Access Corrections must do so with the involvement of a parent or guardian.

8. Revisions to the Privacy Policy

We may update the Privacy Policy as needed to reflect changes to our business and services. We will post changes to the Privacy Policy on our website, with the effective date of the revisions prominently noted. We ask that you review the Privacy Policy frequently to see changes made to the policy. If we make a material change to the Privacy Policy, we will provide appropriate notice.

9. How to Contact Access Corrections with Questions about the Privacy Policy?

We welcome your questions and comments regarding our Privacy Policy. Please direct communications to our Customer Service Department at customerservice@accesscorrections.com or 1-866-345-1884. You may also correspond in writing to Access Corrections, Attn: Customer Service, 10880 Linpage Place, St. Louis, MO 63132.