

# EXHIBIT 21J

You've Got Mail:  
The promise of cyber communication in prisons and need for regulation

*JailATM - Privacy Policy*

**PRISON**  
POLICY INITIATIVE

Tech Friends / JailATM

<https://deposits.jailatm.com/webdeposits/privacy.html>

Cached copy at: <http://www.webcitation.org/6eIDZRWe3>

### **What information do we collect?**

We collect information from you as you use the site, including but not limited to, registration information, purchase information, IP address, browser information, and biometric data. This site is used for restricted communications to inmates housed at government facilities. The government facilities enrolled in this service will have access to identity and transaction information you enter. In addition, for e-mail and video visitation services, the government facilities will be able to intercept, monitor and record such services unless you have requested status as a confidential visitor. Thus, there is NO EXPECTATION OF PRIVACY of anyone participating in any of the services we provide, including JailATM™ transactions and e-mail and video visitation services.

When ordering on our site, you will be asked to enter your credit card information. There will be no refunds under any circumstances. Like most websites, we may use cookies to enhance your experience, gather general visitor information, and track visits to our website. Please refer to the 'do we use cookies?' section below for information about cookies and how we use them.

### **What do we use your information for?**

Any of the information we collect from you may be used in the following ways:

- To process transactions Your information, whether public or private, may be exchanged with other entities for the purpose of identity verification or law enforcement needs. We do not sell your information for cross-marketing purposes.
- For identity verification

Your information may be used to determine your actual identity by governmental agencies as allowed by law. This identity information may be used to authorize deposits into an inmate's account, allow email communications, or video visitations between you and the inmate.

### **What is a confidential visitor?**

**As a confidential visitor, your email and video visitations will not be recorded; however, you must register with, and be accepted as a confidential visitor by the government facility and register as such with us prior to the visitations.**

### **How do we protect your information?**

We implement a variety of security measures to maintain the safety of your personal information when you place an order. These security measures include: password protected directories and databases to safeguard your information, SSL (Secure Sockets Layer) technology to ensure that your information is fully encrypted and sent across the Internet securely or PCI Scanning to actively protect our servers from hackers and other vulnerabilities. We use a secure server and all supplied sensitive/credit information is transmitted via Secure Socket Layer (SSL) technology and then encrypted into our Payment gateway provider's database only

to be accessible by those authorized with special access rights to such systems, and are required to keep the information confidential. Although this greatly reduces the risk of your information being compromised, no security method is unbreakable and we make no guarantee that your information will be not intercepted.

You hereby release and covenant not to sue Tech Friends, its affiliates, and any participating government facility for any civil claim or criminal complaint related to such interception, monitoring, and recording of any content of e-mail or video visitation, any personally identifiable information, and any subsequent use, publication or sharing thereof, including without limitation, any state or federal wiretap, eavesdropping, stored communications, or invasion of privacy statutes.

### **Do we use cookies?**

Yes (Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the sites or service providers systems to recognize your browser and capture and remember certain information).

### **Do we disclose any information to outside parties?**

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information for cross-marketing purposes. This does not include trusted third parties who assist us in operating our website, conducting our business, or servicing you, so long as those parties agree to keep this information confidential. We may also release your information when we believe release is appropriate to comply with the law, aid in identity verification, is needful for law enforcement, to enforce our site policies, or protect ours or others' rights, property, or safety. You hereby authorize such release without the need for a subpoena, warrant, court order or authorization from you. Non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

### **Third party links**

Occasionally, at our discretion, we may include or offer third party products or services on our website. These third party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

### **California Online Privacy Protection Act Compliance**

Because we value your privacy, we have taken the necessary precautions to be in compliance with the California Online Privacy Protection Act.

All personal information can be changed by logging into your account and editing the information on the Account Settings page.

### **Children's Online Privacy Protection Act Compliance**

We are in compliance with the requirements of COPPA (Children's Online Privacy Protection Act). We do not collect any information from anyone under 13 years of age. Our website, products and services are all directed to people who are at least 13 years old or older.

## **Release of Information to Law Enforcement Agencies**

Due to the purpose of this site being to facilitate deposit of funds into inmate accounts, Tech Friends reserves the right to comply with any requests by law enforcement agencies for information supplied to this website. The information will be surrendered prior to the issuance of a warrant or court order.

## **Online Privacy Policy Only**

This online privacy policy applies only to information collected through our website and not to information collected offline.

## **Terms and Conditions**

Please also visit our Terms and Conditions section establishing the use, disclaimers, and limitations of liability governing the use of our website at [www.jailatm.com/Terms.aspx](http://www.jailatm.com/Terms.aspx). This privacy policy is part of, and is incorporated into, the Terms of Agreement.

## **Your Consent**

By using our site, you consent to our privacy policy.

## **Changes to our Privacy Policy**

If we decide to change our privacy policy, we will post those changes on this page, and/or update the Privacy Policy modification date below. Policy changes will apply only to information collected after the date of the change. This policy was last modified on **March 22, 2012. Contacting Us**

If there are any questions regarding this privacy policy you may contact us using the information below. [support@techfriends.com](mailto:support@techfriends.com)