

EXHIBIT 21K

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

JPay - Privacy Policy

PRISON
POLICY INITIATIVE

JPay (accessed Jan. 3, 2016) (direct link not available due to Java script)

Privacy Policy

Updated December 16, 2015 JPay is committed to safeguarding your privacy and your personal information. This Privacy Policy explains how we collect, use, store, share and protect your personal information. By using JPay and any of its related sites, applications, services, products and tools, and/or registering for a JPay account, you expressly consent to our collection, use, disclosure, and retention of your personal information as described in this Privacy Policy and in any of our Terms of Service to which you agree.

What Information Does JPay Collect?

The types of information we collect depend on whether you've registered for an account, which JPay product or service you've used, and how we came to acquire your information. This information can include:

- Contact information such as name, address, telephone number or email address.
- Credit/Debit card information or any card information used for transactional purposes.
- Date of birth.
- Transaction information such as amount sent for money transfer, type of service (i.e. email, video visitation, etc.), inmate name, inmate ID and facility.
- Correspondence with customer support such as email, regular mail and conversations over the phone.
- We may collect and analyze the Internet Protocol (IP) address used to connect your computer or any internet-accessible device to the internet as well as login and password information.

How Does JPay Protect and Store Information?

- We store and process your personal information on our computers, in our facilities, and in our servers, which may be located inside or outside of the US.
- We protect your information using physical, technical, and administrative security measures to reduce the risks of loss, interception, misuse, unauthorized access, disclosure and alteration.
- Some of the safeguards we use are firewalls and data encryption, physical access controls to our data centers, and information access authorization controls.
- We abide by all local and national laws with regard to the use of information, and expressly prohibit use of said information for any illegal or otherwise inappropriate conduct.

What about Cookies?

- Cookies are small files of data that we may place and which may remain on your computer or internet accessible device and allow us to recognize you when you return to the JPay site using the same device and browser.
- We use cookies to: recognize you; customize your experience; help ensure that your account security is not compromised; mitigate risk and prevent fraud; and promote trust and safety for all our services.
- We may use session cookies, which expire and no longer have any effect when you log out of your account or close your browser.
- If you prefer, you can choose to have your computer or device warn you each time a cookie is

being placed, or you can choose to disable all cookies via your browser settings. Like most websites, if you disable cookies, some content may not function properly. However, you can still use JPay by contacting Customer Service.

Does JPay Share Information with Third Parties?

- We may, from time to time, enlist the aid of third party suppliers to work for or on behalf of us. Any third parties are required to adhere to the same level of security and control as JPay.
- In order to protect you from potential fraud, we may verify the information you provide us with third parties. The verification process allows JPay to collect specific information about you in order to safeguard your personal information and any information related to a transaction.
- In particular, we will use credit/debit card authorization and fraud screening services to verify that your card information and address matches the information that you supplied and that the card has not been lost or stolen.
- JPay will only disclose personally identifiable information to third party service providers engaged by JPay, credit card processors, or banking authorities, or if we are compelled to do so by law. These third parties are not allowed to use your information for any secondary purposes.
- JPay may also disclose information that we in good faith believe is necessary to investigate fraud or illegal activity, or to conduct investigations of violations of our Terms of Service.

Marketing

- We do not sell or rent your personal information to third parties.
- We may call, text, mail or email you with helpful information, updates or promotional offers.
- We may use third party suppliers to market to you. Pixel tags and cookies may be used in digital messaging and on our website to help us measure effectiveness, site usage, and to enable us to provide more focused and subsequent marketing communications to you.
- You can opt out of receiving marketing communications from us at any time by contacting Customer Service at support@jpay.com.

Mobile Privacy

- We may offer you the ability to connect with our sites, or use our applications, services, and tools using a mobile device, either through a mobile application or via a mobile optimized or non-optimized website. The provisions of this Privacy Policy apply to all such mobile access and use of mobile devices. This Privacy Policy will be referenced by all such mobile applications or mobile optimized websites.

Children's Privacy

- JPay, its related sites, applications, services and tools are for general audiences and are not intended for children under the age of 13. We do not knowingly collect personal

information from users in this age group from any source.

Compliance with Laws

- All users with an account may make any changes to their personal information and contact preferences at any time by logging into their account and going to the 'My Account' page.
- We ensure compliance with US Government regulations implementing the Unlawful Internet Gambling Enforcement Act (UIGEA). UIGEA prohibits businesses from processing restricted transactions. A restricted transaction involves knowingly accepting a transmittal of any credit, funds, instrument, or proceeds in connection with the participation of another person in unlawful internet gambling. In the event that JPay receives knowledge that a customer is engaged in illegal internet gambling, JPay will close the customer's account and cancel all transactions.

External Links

- JPay, any related sites, or its mobile apps may contain links to other sites and if you decide to follow those links, JPay will not be responsible for the privacy practices or the content of those websites.

Changes to this Privacy Policy

- We may amend this Privacy Policy at any time by posting a revised version on our website(s) and mobile apps. The revised version will be effective at the time we post it.

Your Options

- If you no longer wish to receive marketing communications from us, email Customer Service at support@jpay.com. However, we still may contact you regarding any transactional or legal matter.
- If you no longer wish to use our services, email our Customer Service at support@jpay.com.
- If you have questions about this Privacy Policy, JPay's information practices, Terms of Service, or your dealings with JPay, write us at:

JPay Inc. Attn: Legal Department 12864 Biscayne Blvd., #243 Miami, FL 33181