

# EXHIBIT 21N

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

*Securus - Privacy Policy*

**PRISON**  
POLICY INITIATIVE

## **Securus Privacy Policy**

<https://securustech.net/web/securus/privacy>

Cached copy at: <http://www.webcitation.org/6eH1Hq2t5>

### **PART I: PRIVACY POLICY**

This privacy policy describes how Securus uses and protects the information we collect about you, our customers and the users of our products and services. Any and all purchases or users of Securus products and services, as well as visitors to our website, are subject to this privacy policy.

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

We collect information from you when you open an account or register for online account access. You may be asked, whether by a live agent, computer, telephone, mobile device or otherwise, to provide your name, date of birth, social security number, e-mail address, mailing address and phone number. You may be asked to provide a credit card number and associated information.

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

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

- 1) To process transactions and manage your account (your information, whether public or private, will not be sold, exchanged, transferred, or given to any other company for any reason whatsoever, without your consent, other than for the express purpose of delivering the purchased product or service requested);
- 2) To send you periodic e-mails (the e-mail address you provide may be used to send you information and updates pertaining to your order, as well as occasional Securus news, updates, and related product or service information, etc.);
- 3) To personalize your experience (your information helps us to better respond to your individual needs);
- 4) To improve customer service (your information helps us to more effectively respond to your customer service requests and support needs);

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

We implement a variety of security measures to maintain the safety of your personal information when you open an account or otherwise provide, enter, submit, or access your personal information. We offer the use of a secure server. All sensitive/credit information you supply is transmitted via Secure Socket Layer (SSL) technology and encrypted into our payment gateway provider's database. There, it is accessible only by those employees and agents with special access authorization rights who are required to keep the information strictly confidential. Upon completion of a transaction, your private information (credit cards or debit card number, bank routing or checking account numbers, etc.) will not be stored on our servers.

#### **D) Do we use cookies?**

Yes. Securus uses cookies in two limited contexts, both for the sole purpose of assisting you in the use of your account. Cookies are used when a user enables either of these two features: 1) choosing to view the full site when accessing our website via a mobile device; or 2) choosing to have the website remember your information when logging into our website. The first type of cookie lasts only for the duration of the browsing session; the second type lasts for one year, and can be disabled or enabled as you select. By using our website, you consent to our use of cookies. More details regarding cookies in the context of Securus' video offerings is described below.

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

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information, with the exception of trusted third parties who assist us in operating our website, conducting our business, or providing service to your account, so long as those parties agree to keep this information confidential. We may also release your information as required by law, to enforce our website policies, or protect our or others rights, property, or safety.

#### **F) 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 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.

#### **G) Information used in connection with and in support of law enforcement activities**

When provided with a warrant or other lawful order, and when in possession of information about you, we will assist law enforcement in the conduct of its affairs. Law enforcement, by purchasing and using our services and accessing our website, shall act in accordance in all legal authorities.

#### **H) Our Privacy Policies with respect to Securus Video Visitation**

Our Privacy Policies with respect to Securus Video Visitation (SVV) are set forth in more detail below.

#### **I) Changes to our Privacy Policy**

If we decide to change our privacy policy, we will post those changes on this page, and we reserve the right to do so at our discretion. Any changes shall take effect immediately unless otherwise required by law. We will notify you of changes in advance in cases required by law.

### **Part II. ADDITIONAL PRIVACY POLICIES IN REGARD TO THE SECURUS VIDEO VISITATION (SVV) PRODUCT**

In addition to the terms set forth above, the following shall also apply to purchases or users of Securus' Video Visitation (SVV):

#### **J) Access by Governmental Authorities**

Purchasers and users acknowledge, understand and agree that the SVV session and the data collected in the use of SVV will be accessed, reviewed, analyzed, searched, scrutinized,

rendered searchable, compiled, assembled, accumulated, stored, used, licensed, sublicensed, assigned, sold, transferred and distributed by personnel involved in the correctional industry (federal, state, county and local), investigative (public and private), penological or public safety purposes and specifically including the Department of Homeland Security and any other anti-terrorist agency (federal, state and local) (collectively, "Law Enforcement").

#### **K) No Responsibility**

You agree that Securus assumes no responsibility for the activities, omissions or other conduct of any member of Law Enforcement (a "Law Enforcement Official"). Relative to SVV, Securus acts solely as a portal for the online distribution and publication of electronically distributed information and has no obligation to screen communications or information in advance and is not responsible for screening or monitoring electronic communications sent via this Service. Securus has no liability or responsibility to users for performance or nonperformance of the Service. Securus may take any action with respect to user submitted information that it deems necessary or appropriate, in its sole discretion.

#### **L) General**

Securus is committed to providing a means by which detainees (collectively "detainees" and individually a "detainee") currently incarcerated in a facility (collectively "facilities" and individually a "facility") may establish electronic communication with the user pursuant to this Service. The use of SVV is conducted pursuant to the terms hereof. We want to provide a helpful user experience, but one where all participants understand that the contents of any and all such SVV as well as the information relating to the transfer of money may be accessed, reviewed, analyzed, searched, scrutinized, rendered searchable, compiled, assembled, accumulated, stored, used, licensed, sublicensed, assigned, sold, transferred and distributed by Law Enforcement. As such, you must approach your use of SVV without any reasonable expectation that the contents of these communications are, or will remain, private and/or protected by any legal privilege. With that background in mind, the following reflects our approach to providing the SVV Service, whether you are currently a Detainee or a user.

#### **M) Personal Information About Securus Video Visitation Users**

When you sign up to use the SVV Service, you must provide Securus with certain personal information such as name, address, e-mail address, telephone number, credit card number, etc. We will use this information primarily in connection with efforts to provide the SVV Service. You understand, acknowledge and agree that this information may be shared with Law Enforcement and that we may use and compile that information as part of our responsibilities to Law Enforcement. As a result, you understand, acknowledge and agree that you will not have an expectation of privacy concerning the contents of any Account information.

#### **N) Information that we automatically receive**

In addition to the information you provide to us when you establish your SVV account, Securus receives and stores certain information whenever you participate in SVV. For example, and as noted above, Securus uses cookies. We do this so that we can recognize you when you visit our website. Additionally, we identify the numerical IP address assigned to your computer by your Internet Service Provider. By using our website, you consent to our use of cookies.

#### **O) Use and Disclosure**

The personal information collected also allows us to provide users with private and secure areas to prepare a profile for their use of the SVV. You can correct or update your profile at any time by logging into our website using your username and password in order to implement such corrections or updates. Securus shares information with companies that help us process transactions such as credit card processors. Securus 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 Agreement. Securus will disclose information requested by a regulatory or government authority investigating illegal activities. Similarly, we will disclose your personal information whereby our company or business assets are transferred to a third party or if we are compelled to do so by law.

#### **P) Release**

By accessing and using our website, you hereby release and forever discharge Securus, all applicable Law Enforcement Officials and the facility from any and all liability, expense, cost or remedy which may arise as a result of your use of our website as well as the use of the Data in the manner described above

#### **Q) Recording**

You agree and understand that Video Visitation sessions may be recorded and monitored without prior notification. Some user types, as defined by the Facilities, will not be subject to recording and monitoring.