

HELP Inc. Release of Information Policy

Policy: It is the policy of HELP Inc. to ensure PrePass data and information is protected and released only under the provisions of our bylaws, policy, written agreements and as required by law.

Purpose: To establish the procedures for HELP Inc. employees to release information and/or data when an appropriate request is made and/or required by law.

Scope: This policy is applicable to all information and data requests made to HELP Inc.

Procedures:

1.0 Processing of Information and Data Requests –

1.1 Informal information and data requests are frequently made of HELP Inc. The following process will be followed upon acceptance of a request:

1.1.1 Law Enforcement requests: The National Director of Field Operations (NDFO) will be advised of all law enforcement requests. Should the NDFO be unavailable for an extended period of time, the protocol will be to advise the Vice-President/Chief Operating Officer (COO) and President/Chief Executive Officer (CEO) in ascending order. The NDFO will determine if the request falls under the Exceptions outlined in the PrePass Event Data Retention Policy. If so, the NDFO will immediately contact the President/CEO for the appropriate action. If not, the NDFO will work with the law enforcement agency to ensure the appropriate course of action is taken in a timely fashion.

1.1.2 **Specific Data, Event, Carrier and Individual requests:** Employees receiving data requests regarding specific bypass events, carriers, individuals or trucks should notify the Vice President/COO who will determine the appropriate action.

1.1.3 **General Information/Data Requests** - Data requests that do not provide specific bypass, carrier, truck or customer information should be forwarded to the appropriate Regional Director (RD). The RD may handle the request. If the RD is unsure or needs guidance regarding responding to a request, they should notify the NDFO for guidance.

1.1.4 **Other Requests** – Responses to all other requests for information should be coordinated thru the employee's immediate supervisor and if necessary, the Vice President/COO to determine appropriate action.

1.2 Subpoenas are legal documents which require action on the part of the receiving party. All subpoenas delivered to HELP Inc. will immediately be delivered to the Vice President/COO for the appropriate action.

2.0 FOIA – The initial Freedom of Information Act (FOIA) was a federal law that allowed for the full or partial disclosure of previously unreleased information and documents controlled by the United States Government. Since the original enactment in 1966, it has been modified numerous times and today principally provides access to documentation held by federal agencies under the guidelines outlined by law. Subsequently each state adopted or crafted FOIA laws similar but not identical to the federal act. The provisions of these state laws vary considerably.

2.1 FOIA applies to HELP in under very specific circumstances and all such requests are to be directed to the Vice President/COO or President/CEO.