



SMS Privacy Statement

August 17, 2026

1. Introduction & Scope of This Policy

The New IEM LLC and its affiliates ("IEM," "we," "us," or "our") respect your privacy and we are committed to protecting your privacy. This SMS Privacy Statement (this "Policy") explains how we collect, use, store, and disclose Personal Information that we obtain in connection with your use of IEM's SMS Service, currently provided through Grayscale and integrated with Greenhouse Recruiting (the "Service").

This Policy supplements, and is incorporated into, our SMS Terms of Service. By opting in to the Service, you agree to the terms of this Policy. IEM reserves the right, in its sole discretion, to modify or change this Policy at any time, with or without prior notice.

This Policy addresses the collection, use, and disclosure of information specifically through IEM's SMS Service. It does not replace, and should instead be read together with, the other IEM policies identified in Section 13 (Related Policies) below, including the Workforce Member Privacy Policy (CCPA) and the General Privacy Policy, which govern the broader collection and use of personal information about candidates, employees, and website visitors.

2. What Personal Information Is Collected

"Personal Information" means information that individually identifies you, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with an individual, such as your mobile phone number or user/screen name, as well as any Personal Information you choose to include in messages you send through the Service.

Through your use of the Service, IEM receives the following information from its third-party service provider(s):

- Your mobile phone number when you send a text message to us or otherwise opt in to the Service;
- The content of messages you send to us or to other users of the Service;
- Any user or screen name you select in connection with the Service; and
- Any comments or feedback you provide regarding the Service.

3. How IEM Uses Personal Information

We use Personal Information collected through the Service to: (a) provide you with the Service, including sending you application-status updates and engaging in discussion about your candidacy; (b) process and respond to your inquiries; (c) improve the Service;

(d) contact you, if necessary, with important announcements or administrative messages; (e) conduct research; and (f) provide anonymous, aggregated reporting to internal and external clients and partners.

Each message you send through the Service (to us or to other users of the Service) is stored on the servers of our third-party service providers. IEM utilizes servers and services owned and operated by third parties to provide the Service.

4. Disclosure of Your Information

We will not rent or sell your Personal Information to other companies or individuals, unless we have your consent. We may use or disclose your Personal Information in the following limited circumstances:

- We have your consent.
- We need to enforce our SMS Terms of Service.
- We share it with trusted businesses or persons solely to process Personal Information on our behalf, subject to confidentiality and security obligations consistent with this Policy.
- We share it with third parties that have entered into non-disclosure agreements with us.
- We share it with a company controlled by, or under common control with, IEM, for any purpose permitted by this Policy.
- We respond to subpoenas, court orders, or other legal process, or to establish, exercise, or defend legal rights or claims.
- We believe disclosure is necessary to investigate, prevent, or act on illegal activity, suspected fraud, threats to physical safety, or violations of our Terms of Service, or as otherwise required by law.
- IEM, or its assets, is acquired by or merged with another company.

All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties, excluding aggregators and providers of the Text Message services. Text messaging originator opt-in data and consent will not be shared with any third parties, excluding aggregators and providers of the Text Message services.

However, we may share aggregated, de-identified information (for example, the number of people who used the Service in a given month, or the total number of texts sent in a given week) without further notice.

5. Data Storage, Retention, and Cross-Border Transfer

Your information may be collected, stored, and processed in the United States and/or Canada by IEM and its service providers, including Grayscale and Greenhouse Recruiting. If you are located in Canada, your information may be transferred outside Canada and may be accessed by courts, law enforcement, or national security authorities in the jurisdiction where it is processed. By providing your information, you consent to this transfer and processing.



IEM retains Personal Information collected through the Service for as long as reasonably necessary to fulfill the purposes described in this Policy, including to satisfy applicable legal, accounting, recruiting, or reporting requirements, after which it is deleted or de-identified in accordance with our internal retention practices.

6. Security

IEM takes precautions to protect the security of your Personal Information, including requiring that our third-party service providers safeguard the security of your Personal Information with comparable levels of protection.

Your information will travel through third-party infrastructure that is not under IEM's control (such as an SMS delivery platform or your wireless carrier's network), and this Policy does not apply to, and IEM cannot protect, information you transmit directly to other users. You should never transmit sensitive personal or identifying information to other users of the Service.

7. Opting In to the Service

By checking the checkbox on your application and providing your phone number, you may opt in to receive messages from the Service.

Opting in is optional and is not a condition of your application or candidacy for employment with IEM. If you prefer not to opt in, you may still complete and submit your application, and any future communications will be initiated by phone or email from an IEM recruiter.

8. Opting Out of the Service

You can cancel the Service at any time. Just text "STOP," "QUIT," "UNSUBSCRIBE," "END," "STOP ALL", or "CANCEL" to the phone number used to message you to unsubscribe. After you send the Opt-Out SMS message we will send you an SMS message to confirm that you have been unsubscribed. After this, you will no longer receive SMS messages from us. If you want to opt in again, just reply START to the phone number you unsubscribed from and we will start sending SMS messages to you again.

9. Communications We May Send Without an Opt-Out

We reserve the right to send certain communications relating to the Service, such as service announcements and administrative messages (for example, opt-in and opt-out confirmations), without offering you the opportunity to opt out of receiving them.

10. Eligibility

The Service is not intended for individuals under the age of 18, or who do not otherwise meet the minimum legal age to seek employment with IEM in the applicable jurisdiction. IEM does not knowingly collect Personal Information through the Service from children under 13 years old.



By using the Service, you represent that you are at least 18 years old, or that you otherwise meet the minimum legal age to seek employment with IEM and have any legally required parental or guardian permission to do so.

11. Availability

The Service is currently intended for candidates applying to, or being recruited for, positions located in the U.S. and Canada. IEM may modify, suspend, or discontinue the Service, or this Policy, at any time, with or without notice.

12. Changes to This Policy

IEM reserves the right, in its sole discretion, to modify or change this Policy at any time, with or without prior notice to you. The date of the last update is posted at the top of this Policy. This Policy, and any changes, are effective as soon as posted, and your continued use of the Service following the posting of any changes constitutes your acceptance of those changes.

13. Related Policies

This Policy works together with the following IEM policies, which provide additional detail about how IEM collects, uses, and protects personal information outside the specific context of the SMS Service:

Related Policy	Where to Find It
SMS Terms of Service	The terms governing your use of the SMS Service, including eligibility and message frequency
Workforce Member Privacy Policy (CCPA)	CCPA notice and rights for California candidates and employees
General Privacy Policy	IEM's general website privacy practices

14. Questions or Concerns

If you have questions about the Service, you may reply “HELP” to the 10-digit long code phone number used to message you. If you have questions or concerns regarding this Policy, please contact us using the details below.

Questions about the Service: ta.ops@iemfg.com Questions about privacy: privacy@iemfg.com