

**VERIFIRST BACKGROUND SCREENING LLC.'S
PRIVACY POLICY WITH OPT-OUT BY TELEPHONE AND/OR ONLINE**

FACTS: **What does Verifirst Background Screening LLC. do with your personal information?**

Why? Consumer Reporting companies choose how they share your personal information. Federal Law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share and protect your personal information. Please read this notice carefully to understand what we do.

What? The types of personal information we collect and share can include but may not be limited to the following:

- Internet Protocol (IP) Addresses;
- The webpage from which you entered our site;
- Which web pages you visited while at our Website;
- How long you spend on each page of our Website;
- Cookies and information obtain therefrom to recognize you when you visit our Website again;
- Anonymous information collected from other websites through Google Analytics on which we display advertisement;
- Full Name including Middle Name and/or Initials;
- U.S. Mail Address;
- Electronic Mail (E-mail) Address;
- Billing Address;
- Phone Number;
- Credit Card Information;
- Credit Information;
- Social Security Number;
- Date of Birth;
- Employment History including name and address of prior employers, positions worked and dates of employment;
- Federal and/or State Criminal Records;
- State Lien and/or judgment records;
- State Driver License Information including Driving Records, Traffic Citations and Driver License Suspension Records;
- Education, and Training History and Records;
- U.S. Department of the Treasury Office of Foreign Assets Control (OFAC) information related to economic and trade sanctions based on the U.S. foreign policy and national security goals against targeted foreign countries and regimes, terrorists, international narcotics traffickers, those related to proliferation of weapons of mass destruction and other threats to the national security, foreign policy or the economy of the United States;

- Your personally identifiable information from other consumer reporting agencies and/or data providers, federal, state and municipal law enforcement agencies, civil and criminal courts, State agencies including the division of Motor Vehicles regarding driver license and suspension information, and past and/or present employers and/or landlords.

There are types of personal sensitive information that we will not collect and/or share:

- interest or participation in adult activities (including alcohol, gambling, adult dating, pornography, etc.)
- sexual behavior or orientation
- racial or ethnic information
- political affiliation
- trade union membership or affiliation
- religion or religious belief
- negative financial status or situation
- health or medical information
- status as a child under 13
- the commission or alleged commission of any crime

How? All Consumer Reporting and Background Screening companies need to share consumers' personally identifiable information to run their business. In the section below, we list the reasons Consumer Reporting Agencies and Background Screening Companies can share their Customer's and Consumers' information; the reasons Verifirst Background Screening LLC chooses to share and whether you can limited this sharing.

REASONS WE CAN SHARE YOU PERSONAL INFORMATION

Everyday Business Purposes:

We use the personally identifiable information that you provide to obtain consumer reports for employment and/or tenant screening. Your Consumer Report including your personally identifiable information including but not limited to (Name, Address, Social Security Number, Date of Birth, aliases, etc.) Federal and State Criminal Records, Office of Foreign Assets Control data, information and records, State driver's license information, traffic citations, and your driver's license number; employment, training and educational history; and, character information may be obtained only upon your consent. We will also use the information that you provide to Verifirst to update, correct and/or verify the data set forth in your Consumer Report and/or our data base. Access to the personally identifiable information that you provide is limited to (1) entities with permissible purposes to receive it as defined in the Fair Credit

Reporting Act (FCRA); (2) entities with a permitted use under Title V of the Gramm-Leach-Bliley Act; (3) Our end-users who are only permitted to obtain your consumer report, and personally identifiable information upon your consent and for a permissible purposes; (4) trusted third party corporations who process data on our behalf and who have signed a contract agreeing to implement secure computer practices and procedures to protect your personally identifiable information in accordance with the Fair Credit Reporting Act, the Gramm Leach Bliley Act and applicable state regulations including but not limited to, the reporting of any potential breach of security and unauthorized access to personally identifiable information. You may withdraw your consent for the employer and/or landlord to obtain your consumer report by contacting the employer and/or landlord and/or Verifirst and withdrawing your consent or by contacting Verifirst Background Screening, LLC. pursuant to the methods identified on the Verifirst.com Website.

For Our Marketing Purposes:

Internet Information:

We may collect general Internet Data, including your Internet Protocol (IP) address, the web page from which you enter our site, which of our web pages you visited and how long you spend on each page. Cookies are small files that a site or its service provider transfers to your computer's hard drive about site traffic and site interaction so that we can offer better site experiences and tools in the future. Third-party vendors, including google, may show our ads on sites across the internet. VeriFirst, and third-party vendors, including Google, use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the Double Click cookie) together to inform, optimize, and serve ads based on someone's past visits to VeriFirst's website. Also, VeriFirst and third-party vendors, including Google, use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) together to report how your ad impressions, other uses of ad services, and interactions with these ad impressions and ad services are related to visits to our site. We may contract with third-party service providers to assist us in better understanding our site visitors. These service providers are not permitted to use the information collected on our behalf except to help us conduct and improve our business. No personal information is stored in Cookies. If you prefer, you can choose to have your computer warn you each time a Cookie is being sent, or you can choose to turn off all cookies via your browser settings. Like most websites, if you turn your cookies off, some of your services may not function properly. However, you can still place orders by contacting customer service at the below identified toll free phone number and/or e-mail address.

In addition, we may use Google Analytics based from Display Advertising (e.g. Remarketing, Google Display Network Impression Reporting, the DoubleClick Campaign Manager Integration, or google Analytics Demographics and Interest Reporting) to obtain anonymous information collected from other websites on which we display advertisements. In addition, we may use Remarketing with Google Analytics to advertise online. We use this information to understand how visitors, who access our Website by clicking on those advertisements, interact with our Website. We may also use this anonymous information to enhance or modify our advertisements. We will not facilitate the merging of personally-identifiable information with non-personally identifiable information previously collected from Display Advertising features that is based on the DoubleClick cookie unless you give robust

notice of prior affirmative (i.e. opt-in) consent to that merger. You may opt-out of this anonymous data collection by accessing Google Analytics Privacy Overview Web page and following the procedures noted under Browser Opt-out Section or you can opt-out of Google Analytics for Display Advertising and customize Google Display Network ads using the Ads Settings. You may search for that web page at www.google.com.

Information that You Provide:

Any information that we collect from you may be used in one of the following ways: (1) To personalize your experience – Your information helps us to better respond to your individual needs; (2) To improve our website – We continually strive to improve our website offerings based on the information and feedback we received from you; (3) To improve customer service – Your information helps us to more effectively respond to your customer service requests and support needs; (4) To process transactions – 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; (5) The Electronic and U.S. Postal address that you provide may be used to send you information, respond to inquiries and/or other requests or questions. If you provide your electronic mail and/or U.S. Postal Address you may opt-out of receiving further e-mails and direct contact at your U.S. Postal Address at any time by using the opt-out provision at the bottom of every e-mail or by dialing the toll free phone number identified below or by contacting the Customer Service representative at the below e-mail address.

Non-personally identifiable visitor information may be provided to other parties for marketing, advertising or other uses. We may use information that you provide to improve your experience with our products and services. We may engage third parties to assist us with our marketing research efforts who may retain non-personalized aggregated information. Your participation in our marketing activities and research is optional. You may opt-out of participating in our marketing activities and research by dialing the toll free number identified below or by contacting a Customer Service representative at the e-mail address identified below.

Joint marketing With Other Financial Companies:

We do not sell trade or otherwise transfer to outside Financial Companies your personally identifiable information and/or non-personally identifiable information for Joint Marketing with other companies. If at any time we sold, traded or otherwise transferred to outside parties your personally identifiable information and/or non-personal identifiable information for joint marketing with other financial companies you may opt-out of participating in this joint marketing activities by dialing the toll free number identified below or by contacting Customer Service Representative at the e-mail address provided below.

For our Affiliates' everyday business purposes information about your transactions and experiences:

We do not sell, trade or otherwise transfer to Affiliates your personally identifiable information and/or non-personal identifiable information about your transactions and

experiences. If at any time we sold, traded or otherwise transferred your personally identifiable information and/or non-personally identifiable information about your transactions and experiences for our Affiliates' everyday business purposes, you may opt-out of participating in these activities by dialing the toll free number identified on the website below and/or by contacting a Customer Service representative at the e-mail address provided in the herein website.

For our Affiliate's everyday business purposes- information about your creditworthiness:

We do not sell, trade or otherwise transfer to Affiliates your personally identifiable information and/or non-personally identifiable information about your creditworthiness. If at any time we sold, traded or otherwise transferred your personally identifiable information and/or non-personally identifiable information about your creditworthiness to our Affiliates, you may opt-out of participating in these activities by dialing the toll free number below or by contacting Customer Service Representative at the e-mail address provided below.

For our Affiliates to market to you:

We do not sell, trade or otherwise transfer to Affiliates your personally identifiable information and/or non-personally identifiable information for our Affiliates to market to you. If, at any time we sold, traded or otherwise transferred your personally identifiable information and/or non-personally identifiable information to our Affiliates to market directly to you, you may opt-out of participating in these activities by dialing the toll free number identified below or by contacting Customer service at the e-mail address provided below.

For Non-Affiliates to market to you:

We do not sell trade or otherwise transfer to Non-Affiliates personally identifiable information or non-personally identifiable information to Non-Affiliates to market the Non-Affiliates' products and services to you. We may however, provide your name, U.S. Postal Address and Electronic Mail (E-mail) address as well as Non-personally identifiable visitor information to Non-Affiliates for marketing, and advertising of our products and services to you. We may use information that you provide to improve your experience with our products and services. We may use Non-Affiliates to assist us with our marketing research efforts. Your participation in our marketing activities and research is optional. You may opt-out of participating in our marketing activities and research by dialing the toll free number identified below or by contacting Customer Service at the e-mail address provided below and stating that you wish to opt-out of the marketing and/or research activities.

CHILDREN UNDER AGE 13

VeriFirst Background Screening does not offer services to children under the age of 13, and this web site is not directed to children under the age of 13. VeriFirst Background Screening does not knowingly collect information about children under the age of 13.

TO LIMIT OUR SHARING

To limit our sharing of your personally identifiable or non-personally identifiable information described above, please call our toll free “Opt-Out” Phone Number (800) 891-6024 or send an e-mail to a Customer Service Representative by e-mail at Support@verifirst.com, specifying your decision to Opt-Out and/or limit the sharing of your information.

QUESTIONS

If you have any questions you may call (800) 891-6024 or contact a Customer Services Representative by e-mail at Support@verifirst.com.

WHO WE ARE:

Verifirst Background Screening LLC. is providing this Privacy Notice and Opt-Out Provision to you.

WHAT WE DO:

How does Verifirst Background Screening LLC. Protect My Personal Information?

To protect your personal information, we implement a variety of security measures to maintain the safety of your personal information when you provide information to Verifirst or access your information from the Website. We offer the use of a secure server. All supplied personally identifiable information is transmitted via Secure Socket Layer (SSL) technology and then encrypted into our database to be only accessed by those authorized with special access rights to our systems and required to keep the information confidential. We also protect your personally identifiable information by complying with the data storage and reporting requirements of the Fair Credit Reporting Act and the Gramm Leach Bliley Act as well as other state statutes.

In addition, access to your personally identifiable information is limited to (1) entities with permissible purposes to receive it as defined in the Fair Credit Reporting Act (FCRA); (2) entities with a permitted use under Title V of the Gramm-Leach- Bliley Act; (3) Our end-users who are only permitted to obtain your consumer report, and personally identifiable information upon your consent and for a permissible purpose; (4) trusted third party corporations who process data on our behalf and who have signed a contract agreeing to implement secure computer practices and procedures to protect your personally identifiable information in accordance with the Fair Credit Reporting Act, the Gramm Leach Bliley Act and applicable state regulations including but not limited to, requirements specifically requiring the reporting of any potential breach of security and unauthorized access to personally identifiable information.

How does Verifirst Background Screening LLC. Collect My Personal Information?

We collect your personal information, for example when you:

1. Provide consent for a prospective employer and/or landlord and Verifirst Background Screening LLC. to procure your consumer report including but not limited to an investigatory consumer report and you provide your personally identifiable information to the prospective employer, and/or landlord and/or Verifirst Background Screening, LLC. to assist in the procurement of you consumer report.
2. When you contact Verifirst Background Screening LLC. directly and provide to us your personally identifiable information to procure your consumer report and/or investigatory consumer report and/or to verify your identity to dispute your consumer report and/or investigatory consumer report and/or to correct data and/or information contained in your consumer report;
3. When you enter our website, we collect general internet data, including your Internet protocol (IP) address, the web page from which you enter our site, which of our web pages you visited and how long you spend on each page. We also collect non-personally identifiable information from Cookies which are small files that a site or its service provider transfers to your computer's hard drive about site traffic and site interaction so that we can offer better site experiences and tools in the future. . Third-party vendors, including google, may show our ads on sites across the internet. VeriFirst, and third-party vendors, including Google, use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the Double Click cookie) together to inform, optimize, and serve ads based on someone's past visits to VeriFirst's website. Also, VeriFirst and third-party vendors, including Google, use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) together to report how your ad impressions, other uses of ad services, and interactions with these ad impressions and ad services are related to visits to our site. In addition, we may use Google Analytics based from Display Advertising (e.g. Remarketing, Google Display Network Impression Reporting, the DoubleClick Campaign Manager Integration, or google Analytics Demographics and Interest Reporting) to obtain anonymous information collected from other websites on which we display advertisements. In addition, we may use Remarketing with Google Analytics to advertise online. We use this information to understand how visitors, who access our Website by clicking on those advertisements, interact with our Website. We may also use this anonymous information to enhance or modify our advertisements. We will not facilitate the merging of personally-identifiable information with non-personally identifiable information previously collected from Display Advertising features that is based on the DoubleClick cookie unless you give robust notice of prior affirmative (i.e. opt-in) consent to that merger. You may opt-out of this anonymous data collection

by accessing Google Analytics Privacy Overview Web page and following the procedures noted under Browser Opt-out Section or you can opt-out of Google Analytics for Display Advertising and customize Google Display Network ads using the Ads Settings. You may search for that web page at www.google.com.

4. We also collect your personally identifiable information from other consumer reporting agencies and/or data providers, federal, state and municipal law enforcement agencies, U.S. Department of the Treasury Office of Foreign Assets Control (OFAC), civil and criminal courts, State agencies including the division of Motor Vehicles regarding driver license and suspension information and past and/or present employers and/or landlords.

Why can't I limit all sharing?

Federal law gives you the right to limit only:

1. sharing of Affiliates' everyday business purposes – information about your creditworthiness;
2. affiliates from using your information to market to you;
3. sharing for non-affiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

DEFINITIONS

1. **Affiliates** – Companies related by common ownership or control. They can be financial and nonfinancial companies.
2. **Nonaffiliates** – Companies not related by common ownership or control. They can be financial and non-financial companies.
3. **Joint marketing**- A formal agreement between a non-affiliated companies that together market products or services to you.