



Increasing Safety and Productivity, Reducing Liability

Privacy Policy

Workplace Safety Screenings mission is to build trusted connections online. Respect for people's privacy and the protection of their data is a crucial pillar of trust building. This policy represents our commitment to your privacy and the respectful use of your data. That's why it's important to us that you understand how we collect, use and - in limited cases - share your personal data.

While WSS has tried to make this policy easy to follow and read, we understand that you may still have questions. If you do, you can contact us at Privacy@WorkplaceSafetyScreenings.com. We're here to help.

What This Policy Covers

This privacy policy applies to the websites, mobile applications, and APIs (each, a "Service") owned or operated by Texas WSS Holdings Corp dba Workplace Safety Screenings ("we", "WSS"). It also describes your choices regarding use, access and correction of your personal information.

We offer a wide range of Services to employers, businesses, and individuals, including:

- Criminal record, education, motor vehicle record, and credit screening services to employers for current and prospective employee background checks.
- Drug and alcohol screening and compliance,
- DOT compliance,
- Occupational medicine screening and management services, including but not limited to physicals, functional capacity evaluations, audiograms, FIT testing, EKG's, flu shots, and wellness exams.

Depending on the Service you use, WSS may collect different information about you, and additional privacy terms, notices, and/or disclosures may apply to your use of the Services. This policy does not cover data collected by or through third-party websites or services.

Our Data Collection Practices

Information We Collect

In order to provide the Services, we collect personal information directly from our users, from our customers as part of providing our Services, from visitors to our Services, and from public records.

Collection Directly From Our Users

WSS collects information about users who create accounts with us:

- **Creating an account.** If you create an account, we ask you to provide some basic registration information such as your name and email address. If you're registering on behalf of a company, we may also ask you to provide some details about that company as well.
- **Making a purchase.** If you choose to make a purchase from us, we ask you to provide billing details such as credit card or ACH information.

Workplace Safety Screenings

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- **Commenting on a blog or report.** If you leave a comment on a blog post, that comment will be publicly visible. If you choose to add annotations to your personal background report, your comment will be made available to anyone that you authorize to receive a copy of that report.
- **Contacting us.** If you contact our customer service team, we will collect your contact information, such as phone number or email address, as well as the contents of your communication. We may also collect additional information to help us better assist you, such as technical information about your browser or information about your account with us.

Collection When We Provide Services To Our Business Customers

We may need to collect personal information from you in order to provide Services to our business customers. For example, if you are the subject of screening services (backgrounds, drug and alcohol, or occupational medicine), or if a business customer requests that you verify your identity with us, we may collect some identifying information about you to make sure we're providing the right Services to you.

- **Authorizing a background, drug and alcohol test and/or occupational medical screenings.** When you authorize one of our business customers to complete a screening on you, we ask for your legal name, date of birth, and other identifying details such as your Social Security number, residential address, date of birth, email address, phone number(s), medical history or past employment or educational history (depending on the type of background check requested).
- **Verifying your identity.** We collect personal information from you so that we can confirm that you are who you say you are. This personal information could include your legal name, address, phone number, email address, Social Security number, employee identification number, or a government-issued photo ID document.
- **Protected Health Information (PHI).** Our occupational health services require you to complete an authorization prior to the screening services. This allows the clinics and their employees who provide the health record to WSS, which at that time becomes ownership of WSS. You may request a copy in writing. These records are stored in [ShareFile](#) and [QuickBase](#), both adhere to HIPAA compliance standards. The information we provide our business customers are only for the purpose of:
 - The present or past members of the customers workforce; and
 - The purpose of the information being disclosed is:
 - To conduct an evaluation relating to medical surveillance of the workplace;
 - To comply with federal or state law; or
 - To evaluate whether the individual has a work-related illness or injury

Collection From Third Party Sources

If you authorize us to create a background report about you, we'll collect public records and other information from reliable third-party sources to assemble the report. We may also verify information you provide us against authoritative government databases or information providers. For drug and alcohol testing, and occupational medicine screenings we will obtain medical records from third party clinics to assist in verify fit for duty. If you are a business customer, we may also use reputable data providers like MailChimp, Quickbase, HubSpot, and LinkedIn to supplement the information you provide to us.



Collection When You Visit Our Website

Workplace Safety Screenings makes use of tools such as cookies to collect various types of information about your activity and computer while you use the website of a Service. This information is only used to deliver and market the Services.

- If you visit our website, we will collect technical information from your browser, whether you have an account with us or not. This includes *log data*, which is automatically generated by your browser every time you request a webpage, and includes your IP address, browser User Agent, Referer, and the requested webpage. We might also request *analytics data*, which include cookies and third-party analytics tools like Google Analytics.
- We use content and preference cookies (both temporary and persistent) and similar technologies, and our partners may, too. These technologies are used in analyzing trends, administering the website, tracking users' movements around the site, and gathering demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual and aggregated basis. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our website or service.
- We use tools by services such as Google Analytics and HubSpot to learn about how people discover, use, and interact with our website.
- We have engaged HubSpot to analyze the activities of visitors to this website, and HubSpot's authorized use of cookies and other tracking technologies enable it to have access to Personal Information of visitors to this website. Such access to and use of HubSpot is governed by [HubSpot's Privacy Policy](#).
- We use third-party advertising companies that collect information about your usage of the website to help us decide how to buy ads elsewhere on the web. We also partner with these third parties to display advertising on our website or to manage our advertising on other sites. Our third party partner may use cookies or similar technologies in order to provide you advertising based upon your browsing activities and interests.

How We Use The Information We Collect From You

Your information is used to provide and improve the Services. That includes operating the website, remembering your preferences, conducting in-house research and development, preventing fraud or abuse, marketing products or services offered by us, or by selected partners to you, and to communicate with you about your use of the Services and address your concerns.

When We Share Your Information

In limited circumstances, we share the information we collect from you.

- **With your consent.** We may share your information when you give us permission - for example, if you authorize us to share your background report with a platform or employer.
- **With our service providers.** We work with trusted third parties for such services as retrieving public records, health records, drug and alcohol test results, and payments processing. We share the minimum amount of information necessary to provide the Services. In addition, any third-



party service provider we use is required to secure your information and only use it to provide the services described in this Privacy Policy.

- **De-identified and aggregated data.** We may share or disclose information we collect after de-identifying and aggregating it so it cannot be linked back to an individual person. We contractually require third parties to respect this practice.
- **Fraud and abuse prevention.** We partner with certain third party vendors to prevent fraud and abuse. When you make a purchase, we analyze your payment information and unique device identifiers (including, but not limited to, IP address, MAC address, geographical location, browser and operating system settings) to identify suspected fraudulent activity and block it. We may share information associated with activity flagged as fraudulent (including, but not limited to, payment information, email addresses, and unique device identifiers) with our security partners or law enforcement.
- **For legal process and emergency situations.** We may be required to disclose or preserve for future disclosure your personal information if we believe, after due consideration, that doing so is reasonably necessary to protect WSS's rights or property or to comply with a law, regulation, valid legal process, or to prevent imminent and serious bodily harm to a person, and in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Unless prohibited from doing so by law or court order, we will do our best to provide subjects – including candidates and applicants - of law enforcement requests with advance notice before we disclose their information to law enforcement, if we have contact information for that customer. We reserve the right to withhold advance notice where it would impede an investigation of identity theft, or in situations involving imminent physical harm or harm to minors.

Your Privacy Choices

Personal information and preferences can change. We understand that. That's why we make it possible for you to update certain types of personal information we have about you.

Access, Update And Correct Your Information

You have the right to access your personal information. When relevant, you may use your account to access, correct, or change any personal information that is associated with your account. You may also email our Privacy Team at Privacy@WorkplaceSafetyScreenings.com if you have provided personal information to us but do not have an account, or if you wish to delete your account entirely. We will do our best to respond to your request within a reasonable timeframe.

Your Opt-Out And Communication Choices

We may send you information about our products, notices regarding your account, and other messages related to WSS services, including marketing emails. You can unsubscribe by clicking on the unsubscribe link in those emails, emailing Privacy@WorkplaceSafetyScreenings.com with the email address you wish to unsubscribe, or calling 855 572 5577. Please note that you may still receive account and billing notices from us, if applicable.



Other Privacy Information

We follow industry-standard best practices to keep your data safe and secure. WSS does not share your information with third parties for their own marketing purposes. We do not collect information from children under the age of 13, except for DNA testing purposes which require the child's guardians written consent and the information is only provided to the testing laboratory.

Data Security And Retention

WSS retains all of the information we collect or that you submit for as long as your account is active, or is needed to provide you services, or for purposes including fraud prevention, legal compliance, dispute resolution, as well as for the enforcement of our agreements.

Your information is stored on secure servers in the United States. While we use acceptable industry-standard practices to protect your information, we cannot and do not guarantee that your information will be absolutely secure. Here are a few other steps we take to protect your information:

- We implement technical measures to prevent unauthorized access, and keep security patches and software up-to-date
- Employee access to your information is restricted and audited
- Sensitive personal information is stored in HIPAA compliant servers
- All personal information is encrypted during transfer

Access And Choice

You have the right to access your data. Upon request, we will provide you with information about whether we hold any of your personal information. To access your data, please contact us at the information below, we will provide you with instructions on how you can go about doing so.

If you seek to access, or to correct, amend, or delete inaccurate data, please direct your query to Tone Trondsen using the contact information below. If you request for us to remove your data, we will respond to you within a reasonable timeframe.

Changes To This Policy

If we make material changes to this Privacy Policy that affect your rights, we will post a notice on the site before that change becomes effective. We encourage you to periodically review this page for the latest information on our privacy practices. If we make any changes to this Policy, we will change the "Last Updated" date above.

Contact Information

If you have any questions about this Policy, please contact us at 855 572 5577, or Privacy@WorkplaceSafetyScreenings.com.

Workplace Safety Screenings
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