



## **ASURINT PRIVACY POLICY**

Thank you for visiting the **Asurint** web site. In furtherance of our commitment to the privacy of our customers and individuals who visit this site, we have implemented and abide by the following Privacy Policy.

### **Scope**

This Privacy Policy applies only to information you provide to us online while visiting or using our web site. It does not apply to information we have obtained offline or through other traditional means. If you use our web site to apply for employment with Asurint, we will handle your data pursuant to the parts of this Policy specific to that function. Information you may provide in visiting our site falls into two broad categories: Information you provide directly to us, and information automatically collected by the technology of our web site and your computer.

### **Personal Information Collection**

"Personal Information" is information that can be used to identify or contact you, such as your name, email address, mailing address, credit card information, or any information you submit on an application for employment.

#### Information voluntarily provided by you

When using this Site, you may choose to provide us with information to help us serve your needs. The Personal Information that we collect will depend on how you choose to use this Site.

#### Where you request information about our services

If you request further information about our services, we require you to submit your name, e-mail address, the name of your organization and the country in which you are based so we may send you the material you have requested, and to enable us to identify if you have an existing relationship with Asurint.

#### Where you register with us and/or request services

If you register with the Site, or request a service available on the Site, we may ask you for your name, e-mail address, country, telephone number and the reason for your communication, as well as information about your position and organization and such other information as is reasonably necessary so that we can provide you with the service. Any Personal Information that you send us will be used for the purpose indicated on the Site or in this Privacy Policy.

Following an inquiry into receiving services from us, if you decide to proceed, we will collect Personal Information necessary to proceed with the transaction, such as your name, address, post code, contact telephone number, e-mail address, billing address or payment details, and other Personal Information as relevant to the product. We will use your Personal Information to administer your account, process requests, etc. and generally manage your relationship with us.

#### Information collected from individual consumers

Asurint is a Consumer Reporting Agency regulated by the Fair Credit Reporting Act 15 U.S.C. §1681 et seq. ("FCRA"), and offers a wide range of employment background screening services, including criminal record searches, previous employment and education verification and references, motor vehicle records and more.

Asurint provides information to business customers only - not to the general public. Asurint customers must certify a permissible purpose under the FCRA to receive the information. Customers must also disclose to a consumer that a

Consumer Report (also known as a background report, background check, etc.) is being requested and obtain the consumer's written authorization. All customers must undergo a prequalification process.

Individual consumers may provide "Applicant Data" via this Site. The Applicant Data that may be requested includes, but is not limited to: name, contact information (phone, email address, etc.), date of birth, employment and education history, and identification number (such as a Social Security Number). Asurint will treat any Applicant Data considered sensitive under applicable law in accordance with that applicable law. The collection and use of sensitive Applicant Data will be limited to that which is strictly necessary for the purposes for which it was collected. Your explicit consent will be obtained to the processing of your sensitive Applicant Data, unless otherwise permitted by applicable law.

### **Use of Personal information**

Asurint collects, uses and discloses your Personal Information in its normal course of business for the following purposes:

- Establishing and maintaining communications with you;
- Where you have requested a service from Asurint, assisting you in the completion of your application, the assessment of your eligibility for any such requested service, the processing and maintenance of the service, as well as any applicable renewal of such service;
- Responding to your inquiries about applications, accounts and other services;
- Making proposals for future service needs;
- Allowing our affiliated companies to notify you of certain products or services offered by our affiliated companies;
- Processing transactions through service providers;
- Meeting legal, security, processing and regulatory requirements;
- Protecting against fraud, suspicious or other illegal activities; and
- Compiling statistics for analysis of our sites and our business.

Except as provided by this Privacy Policy or otherwise permitted by law, Asurint does not use Personal Information collected from our customers through this web site, whether order information or client information, for any purpose other than for conducting the Asurint Services.

#### *Use of Personal Information from individual consumers*

Any Applicant Data collected via this Site will be used for such purposes as to prepare a Consumer Report in connection with your employment application, volunteer application, contractor relationship, etc. as requested by our customers. (Note: Asurint is not involved in the hiring or eligibility determination process for our customers). If applying to work for Asurint, the Applicant Data will be used for such purposes as to consider your candidacy for employment and will populate an employee record in the event you are hired by Asurint.

### **Disclosures to Third Parties**

Generally we do not share with third parties any Personal information, except as needed to carry out the services requested. However, in the normal course of performing services for our clients, Personal Information may be shared within Asurint and its affiliates for research and statistical purposes, system administration, etc.

As we continue to develop our business, we might sell or buy assets. In such transactions, user information, including Personal Information, generally is one of the transferred business assets. Also, if either Asurint itself or substantially all of Asurint's assets were acquired, your Personal Information may be one of the transferred assets. Therefore, we may disclose and/or transfer your Personal Information to a third party purchaser in these circumstances.

Asurint preserves the right to disclose without your prior permission any Personal Information about you or your use of this Site if Asurint has a good faith belief that such action is necessary to: (a) protect and defend the rights, property or safety of Asurint, employees, other users of this Site, or the public; (b) enforce the terms and conditions

that apply to use of this Site; (c) as required by a legally valid request from a competent governmental authority; or (d) respond to claims that any content violates the rights of third-parties. We may also disclose Personal Information as we deem necessary to satisfy any applicable law, regulation, legal process or governmental request.

### **Safeguards**

Asurint has put in place administrative, procedural and technical safeguards designed to prevent unauthorized disclosure or use of information you provide to us. For example, Personal Information is encrypted while being transmitted and at rest, and access to information is granted on a privileged permission basis and is only available where needed in conjunction with the services being rendered.

### **Cookies**

Like many companies, we may use cookies on this Site. Cookies are pieces of information shared between your web browser and a website. Use of cookies enables a faster and easier experience for the user.

There are different kinds of cookies with different functions:

- i. Session cookies: these are only stored on your computer during your web session. They are automatically deleted when the browser is closed. They usually store an anonymous session ID allowing you to browse a website without having to log in to each page. They do not collect any information from your computer.
- ii. Persistent cookies: a persistent cookie is one stored as a file on your computer, and it remains there when you close your web browser. The cookie can be read by the website that created it when you visit that website again.
- iii. First-party cookies: the function of this type of cookie is to retain your preferences for a particular website for the entity that owns that website. They are stored and sent between Asurint's servers and your computer's hard drive. They are not used for anything other than for personalization as set by you. These cookies may be either Session or Persistent cookies.
- iv. Third-party cookies: the function of this type of cookie is to retain your interaction with a particular website for an entity that does not own that website. They are stored and sent between the Third-party's server and your computer's hard drive. These cookies are usually Persistent cookies.

Except as described in this Privacy Policy, we do not use third-party cookies on our Sites.

This Site does use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help the website analyze how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity, and providing other services relating to website activity and internet usage for Asurint and its affiliates. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

The major browsers have attempted to implement the draft "Do Not Track" ("DNT") standard of the World Wide Web Consortium ("W3C") in their latest releases. As this standard has not been finalized, Asurint's Sites are not compatible with DNT and so do not recognize DNT settings.

### *Website Navigational Information*

As you navigate the Site, we may also collect information through the use of commonly-used information-gathering tools, such as cookies and web beacons (collectively "Website Navigational Information"). Website Navigational

Information includes standard information from your web browser (such as browser type and browser language), your Internet Protocol ("IP") address, and the actions you take on the Site (such as the web pages viewed and the links clicked).

### **Links**

This Website contains links to other sites. Please be aware that we are not responsible for the privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of each and every web site that collects personally identifiable information. This privacy statement applies solely to information collected by this web site.

### **Changes to your Information**

Asurint allows you to update, correct or delete Personal Information you have provided us. Accordingly, upon your reasonable request, and to the extent your request does not compromise our other obligations with regard to Personal Information, we will provide you with access to Personal Information you have previously provided to us, and allow you to update and correct this Information. In addition, we provide you with the ability to decline — or "opt-out of" — certain online mailings and other online materials we may offer to our web site users. Finally, if you request, we will remove from our marketing databases your name and other Personal Information which you have provided via this web site. Please understand, however, that it may be impossible to remove this information completely, due to backups and records of deletions. If you wish to change or delete the Personal Information you have provided us via this web site, please contact us at the address listed below. Please further understand, as stated above, that this Privacy Policy does not govern use of the databases we employ to provide our services, and this Policy does not cover a data subject's request to remove or alter identifying information which is contained in these services-related databases, and which we have obtained by means other than through this web site.

### **Data from Children**

Our site is not directed at children, and we will not accept or request personal information from individuals we know to be under 13. In accordance with the Children's Online Privacy Protection Act of 1998, if we learn that a child under 13 has provided us with Personal Information, we will delete this information from our databases, in accordance with our deletion policy, set out above. For more information regarding a child under the age of 13 providing Personal Information to a Web site, see the Federal Trade Commission's Web site explaining the Children's Online Privacy Protection Act of 1998 at <http://www.ftc.gov/bcp/online/edcams/kidzprivacy/>.

### **CALIFORNIA PRIVACY RIGHTS**

California Civil Code Section 1798.83 requires any operator of a website to permit its California-resident customers to request and obtain from the operator a list of what Personal Information the operator disclosed to third parties for direct marketing purposes, for the preceding calendar year, and the addresses and names of such third parties. Asurint does not share any personal information collected from this site with third parties for their direct marketing purposes.

### **Personal Information Disclosure: United States or Overseas**

Personal Information collected by Asurint is stored securely within the United States. In the course of business in order to fulfill requested services, information may be accessed by individuals outside of the United States. All information will be accessed in a secure manner in accordance with the terms of this Privacy Policy. Asurint will at all times abide by state and federal laws and regulations in regard to Personal Information collected from our web site.

### **Your Consent**

By using our web site, you consent to our collection and use of information in accordance with this Privacy Policy. If you do not agree with some, or all, of the terms of this Privacy Policy, please refrain from submitting such information through our web site or from visiting our site. Additionally, you may be asked to install ActiveX

components in order to access certain functions of the Asurint system or this site may, in limited circumstances, direct you to third-party sites that may be connected to third-party information.

### **Asurint respects your privacy concerns**

Asurint's privacy and security policies demonstrate our responsibilities to the individuals about whom we report information and to our customers who rely on us to safeguard the information they order. If you have any questions or concerns about Asurint's privacy and security policies, please contact us.

### **Privacy Policy Changes**

Please note this Privacy Policy will change from time to time. We expect most such changes to be minor, but there may be changes that are more significant. Any changes will be posted on this page and if the changes are, in our interpretation, significant we will also provide a more prominent notice.

### **Contact Us**

If you have questions about this Privacy Policy, its implementation, or general questions about our practices, please contact us at:

Asurint  
Compliance Team  
[compliance@asurint.com](mailto:compliance@asurint.com)  
1-800-906-2034  
PO Box 14730  
Cleveland, Ohio 44114

Last updated June 2017.