

***DATALINE* VERIFICATION CO.**

BACKGROUND INVESTIGATION AND INFORMATION SERVICES

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PRIVACY POLICY

Taking a proactive approach in protecting consumer privacy has always been an important focus for Dataline. We constantly monitor and seek ways to protect and assure appropriate use of information related to consumers and to promote policies within the industry that do the same.

Privacy is a priority for Dataline as we deliver information for our clients across the globe. Given the sensitive nature of our public record searches, the management and distribution of such information is protected by the highest level of security. Our privacy principles guide how we do business every day. To review these principles, [click here](#).

We have long understood the importance of fair information practices and consumer privacy. Our objective is to help our clients make informed decisions through access to public record information. Dataline is an active member of various trade associations with which we do business (including the National Association of Professional Background Screeners) and conform to all self regulatory guidelines of these associations. Dataline actively monitors local laws in order to be compliant with any regulatory requirements. We maintain redundant electronic and physical security measures, which exceed the provision and policies mandated by the Privacy Act, to safeguard all personal and public record data. Dataline will not and shall not conduct a background investigation unless it receives the appropriate release from the subject in question and is requested by an appropriate authorized individual of its client.

Additional questions about our privacy and security policy should be e-mailed to us at info@datalineverification.com.

PRIVACY PRINCIPLES

Dataline Verification Co. respects individual privacy and values the confidence of its clients, employees, vendors, consumers, business partners and others. Dataline strives to collect, use and disclose Personal Data in a manner consistent with the laws of the country we do business, and have always upheld the highest ethical standards in its business practices. We abide by the *Safe Harbor Principles* developed by the U.S. Department of Commerce, and in fact, these principles set forth the minimum privacy principles that Dataline follows with respect to transfers of Personal data.

I. PRIVACY PRINCIPLES

- 1 NOTICE: Where Dataline collects Personal Data directly from individuals applying for employment at Dataline, it will inform them about the purpose for which it collects and uses Personal Data about them, the types of non-agent third parties to which Dataline discloses that information, if any, and the choices and

mean, if any, Dataline offers individuals for limiting the use and disclosure of their Personal Data. Notice is provided in clear and conspicuous language when individuals are first asked to provide Personal Data to Dataline, or as soon as practical thereafter, and in any event before Dataline uses the information for purposes other than that for which it was originally collected. Dataline may disclose Personal data if required to do so by law or to protect and defend the rights or property of Dataline. Dataline will collect client-employee Personal data only in accordance with the notice to and consent given by the client-employee.

- 2 CHOICE: Dataline will offer individuals the opportunity to choose (opt-out) whether their Personal Data is (a) to be disclosed to a non agent third party, or (b) to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual.

For sensitive Personal data, Dataline will give individuals who apply for employment at Dataline the opportunity to affirmatively and explicitly (opt-in) consent to the disclosure of the information to a non-agent third party or the use of the information for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual. Dataline collects sensitive Personal Data on client-employees only pursuant to the person's express consent.

- 3 DATA INTEGRITY: Dataline will use Personal data only in ways that are compatible with the purpose for which it was collected or subsequently authorized by the individual. Dataline will take reasonable steps to ensure Personal Data is relevant to its intended use, accurate, complete and current.

- 4 TRANSFERS TO AGENTS: Dataline will obtain assurance from its agents that they will safeguard Personal Data consistent with this policy. Examples of appropriate assurances that may be provided by agents include: a contract obligating agent to provide at least the same level of protection as is required by the relevant *Safe Harbor Principles*, Safe harbor certification, or agent being subject to similar *Safe Harbor Principles* from the equivalent government agency as the U.S. Department of Commerce.

- 5 ACCESS AND CORRECTION: Upon request, Dataline will grant individuals reasonable access to Personal Data that it holds about them. In addition, Dataline will take reasonable steps to permit individuals to correct, amend or delete information that is demonstrated to be inaccurate or incomplete. Any employees of Dataline who desire to review or update Personal Data can do so by contacting their local Human Resources representative. Client-employees must contact their employer and/or the company to whom they gave consent to conduct our background investigation.

- 6 SECURITY: Dataline will take reasonable precautions to protect Personal data in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction. Dataline protects data in many ways. Physical security is designed to prevent unauthorized access to database equipment and hard copies of sensitive Personal Data. Electronic security measures continually monitor access to servers and provide protection from hacking or unauthorized access from remote locations. This protection includes the use of firewalls, restricted access and encryption technology. Dataline limits access to Personal Data and

data to those persons in Dataline's organization, or as agents of Dataline, that have a specific business purpose for maintaining and processing such Personal Data. Individuals who have been granted access to Personal Data are aware of their responsibilities to protect the security, confidentiality and integrity of that information and have been provided training and instruction on how to do so. Dataline will disclose client-employee Personal data only to the client who requested we conduct a background investigation in accordance with the notice provided by the client to the client-employee and/or the consent given by the client-employee.

- 7 ENFORCEMENT: Dataline will conduct compliance audits of its relevant privacy practices to verify adherence to this policy and the U.S. Department of Commerce *Safe Harbor Principles*. Any violation will be subject to disciplinary action up to and including termination.

II. SCOPE

The above policy principles will apply to all Personal Data received by Dataline regardless of format, whether electronic, paper or verbal communication. Dataline collects and processes Personal Data concerning current and former employees of Dataline as well as job applicants for employment at Dataline through its internet website, intranet site, electronic mail and through verbal and written correspondence. It does so for legitimate business reasons which might include human resource business reasons such as payroll administration, filling employment positions, meeting governmental reporting requirements, security, network access and authentication. Dataline is the sole owner of information it collects from these individuals. We do not sell or share this information with third parties in ways different than what is disclosed in the Privacy policy. Dataline does not and will not request or gather information regarding political opinions, religion, philosophy or sexual preference.

In addition to the above parties, Dataline offers *background screening services* that are regulated under the Fair Credit Reporting Act (FCRA) and provide consumer reports primarily in connection with employment and tenant screening. These services help reduce turnover and shrinkage, decrease training costs, increase productivity while protecting the integrity of a company against possible negligent hiring lawsuits. Through this service to company clients, Dataline collects and processes Personal Data of individuals who apply for employment at Dataline's clients ("client employees" and "client employee Personal Data"). As such, the scope of the above privacy principles also apply to Dataline's clients. Dataline will only conduct background investigations in accordance with notice given to and/or consent obtained from client employees. Dataline will not and shall not sell or share client-employee Personal Data to third parties other than the client on whose behalf the Personal Data was collected. All Personal Data collected by Dataline will be used for legitimate business purposes consistent with this policy and shall be properly secured at all times.

III. DEFINITIONS

Background screening services means employment screening services, which include background checks involving criminal records searches, credit checks, motor vehicle records, social security trace reports, personal identification, phone number trace reports, employment verification, education verification, drug screening, Medicare sanction searches, Office of Foreign Asset

Control, where such checks are permissible by law, and which services are rendered at the request by a client of Dateline.

Personal Data means any information or set of information that identifies or could be used by or on behalf of Dateline to identify an individual. Personal Data does not include information that is encoded or publicly available information that has not been combined with non-public Personal data.

Sensitive Personal Data means Personal Data that reveals race, ethnic origin, trade union membership, or that concerns health. In addition, Dateline will treat as sensitive Personal Data any information received from a third party where that third party treats and identifies the information as sensitive.

IV. DISPUTE RESOLUTION

Any questions or concerns regarding the use or disclosure of Personal Data should be directed to Dateline's security officer by calling 973-887-0207. Dateline will investigate and attempt to resolve complaints and disputes regarding use and disclosure of Personal Data in accordance with the principles contained in this policy.

V. INTERNET PRIVACY

Dateline views the internet, intranets and use of other technologies as valuable tools for communicating and interfacing with consumers, employees, vendors, business partners and others. We recognize the importance of maintaining the privacy of Personal Data collected through the website that it operates. Dateline's sole purpose for operating its website is to provide information concerning its products and services to the public. Visitors may elect to voluntarily provide Personal data but are not required to do so. The Personal Data voluntarily provided by website users is contact information limited to user's name, home and/ or business address, phone numbers and e-mail addresses. Dateline collects this information so it may answer questions and forward requested information. Dateline does not sell or share this information with non agent third parties.

Effective Date: 1/15/2008