



Key Background Screening, Inc. Privacy Policy

At Key Background Screening, Inc. (“Key”), protecting personal information is a top priority. Key recognizes the importance of safeguarding its clients’ information, as well as, the privacy rights of each of their applicants and employees. This is a responsibility Key takes most seriously.

To that end, Key’s Privacy Policy covers the information and security practices mandated by Key, as well as Key’s handling and securing of the information provided by Key’s clients and their applicants/employees. All information is collected, stored and used in compliance with applicable law, including but not limited to, the Fair Credit Reporting Act, the Fair and Accurate Credit Transactions Act and other state, national, and, where applicable, international laws.

Notice

As a corporation specializing in employment background screening, Key collects and maintains extremely sensitive personal information about individuals. This information may include, but is not limited to, full name, previous names, social security number, government national identification number, date of birth, phone numbers, residential addresses, credit information, employment history, driving history, and criminal record history.

Key provides employment screening services exclusively to legitimate business entities that have certified the information will be used only for a permissible purpose as outlined by the FCRA or other applicable law. Key releases information only to authorized representatives of client companies and to the individual about/on whom the report was compiled, as required by the law.

In all cases, appropriate identification is required prior to dissemination. Under no circumstances will the personal information collected and maintained by Key Background Screening, Inc. ever be sold or provided to an outside entity for any other purpose, unless required by law. Key does not use any applicant information to compile mailing lists for sales or any other purposes, nor is any of this information available to any other Key clients.

Individual Right To Access

Key acknowledges that individuals have the right to access the personal data that we maintain about them. Upon written request, Key will provide applicants the opportunity to determine if any of their personal data has been obtained by Key. And, if so, to correct, amend or delete any information determined to be inaccurate or incomplete. To dispute or obtain a copy of your report, please visit our website at (keybackground.com). Disclosure of any information is governed under the terms of the FCRA. Key reserves the right to confirm the identity of anyone requesting information.

Choice

Because all information is collected only after the consumer has signed a consent waiver, Key affords consumers the choice of whether the information is collected and disclosed. Additionally, information is only used for the purposes as described in the section under “Notice”. Key does not provide information to any third party, except for organizations or individuals acting as subcontractors to perform portions of the background screening on Key’s behalf. If a consumer wishes to opt-out of the collection and disclosure of any information, withdrawal of consent can be made by either notifying Key using the contact information listed below or by choosing not to complete forms provided by Key or our client.



Onward Transfer

In connection with providing our background screening services, Key may utilize the services of other companies and individuals as our subcontractors to perform portions of the background check on our behalf. All subcontractors used by Key are contractually obligated to use and maintain the confidentiality of personal information in a manner consistent with this privacy policy.

Personal Information Disclosure: the United States or Overseas

Key Background Screening, Inc. does not offshore our background checks. All work performed by Key is done exclusively within the United States and all data is maintained and stored in the United States. We utilize best efforts to maintain the redaction of information based on local regulations. However, for those individuals with experience and/or residence outside of the United States, upon the request of our client, Key may utilize sources outside the United States for the purposes of completing the applicable portion of the background check. Key will not use or otherwise disclose any of the personally identifiable information collected from third parties or other sources. Key may be required to disclose an individual's personal information in response to a lawful request by public authorities, including to meet national security and law enforcement requirements.

Our Privacy Systems and Procedures

All Key personnel with access to personal information are required to use logins and passwords, and are routinely trained in maintaining the security of personal information. Key constantly reviews and refines its procedures in order to ensure that all personal information is maintained in a confidential and safe manner.

Key's Commitment to Data Security

Special attention is given to website security and the overall security of all data storage, processing, and transmission systems. The data contained within Key's system is protected by, but not limited to, the following security measures:

- Minimum of 128-bit Secure Socket Layer Encryption
- Advanced system access protection and user identification/tracking
- Robust Firewalls and Intrusion Prevention Service (IPS)
- In-depth security audits and penetration testing

Compliance

Key conducts best efforts to adhere to the applicable laws, regulations, and standards, including, but not limited to the Fair Credit Reporting Act (FCRA), the Fair and Accurate Credit Transactions Act (FACTA), and, where applicable, Payment Card Industry Data Security Standard (PCI DSS) .

Website Access and Information: Personal Identification Information

Key may collect personal identification information from users in a variety of ways. This may include, but not limited to, users visiting Key's site, registering on the site, subscribing to a Key newsletter/blog, responding to a survey and filling out a form or in connection with other activities, services, features or resources Key makes available on its Site.



Users may be asked for certain information, including, but not limited to: name, email address, mailing address and/or phone number. Users may, however, visit Key's Site anonymously. Key will collect personal identification information from users only if they voluntarily submit such information to Key. Users can always refuse to supply personal identification information; however, such refusal may prevent them from engaging in certain Site-related activities.

Key may collect and employ Users' personal information for the following purposes:

- Improve Customer Service – Information you provide helps Key respond to your customer service requests and support needs more efficiently;
- Personalize User Experience – Key may use information in the aggregate to understand how our users as a group utilize the services and resources provided on Key's Site;
- Run a Promotion, Contest, Survey or other Site features – This information allows Key to send users material they agreed to receive about topics Key thinks will be of interest to them; and,
- Send users Information – The data provided by users permits Key to send, as agreed to by these same users, periodic emails concerning topics which may be of interest to them.

Key may utilize the email address(es) supplied by users. This is in order to send users information and updates pertaining to their orders. It may also be used to respond to their inquiries, questions, and/or other requests. If a user decides to opt-in to a Key mailing list, that user will receive emails. These emails may include compliance updates, company news, system updates, related product or service information, etc. If the user wants to unsubscribe from receiving emails, detailed unsubscribe instructions are included at the bottom of each email. Also, the user may contact Key via Key's Site.

In addition, where applicable and only with prior, written permission, Key may also collect and/or utilize credit card and/or other online payment information for specific uses, including but not necessarily limited to, for automatic/recurring payments, refunds, *etc.* See "Credit Card or Other Online Payment Methods Privacy Policy" below for more information specific to these types of data.

Credit Card or Other Online Payment Methods Privacy Policy

This portion of Key's Privacy Policy notice describes our privacy policy as it relates to the collection, protection and disclosure of such information resulting from credit card transactions and other electronic payment methods (e.g., ACH payments) only.

- Collection of Information: Key will collect and use information obtained from credit card transactions only for business purposes. These business purposes include the payment of invoices and applicable fees.
- Protecting Your Credit Card or Other Online Payment Information: Key will utilize best efforts to safeguard the confidentiality and security of the information we obtain from you. The credit card and/or other payment information provided by you to Key will be stored in a confidential manner. Key may access such information only when there is an appropriate business reason to do so, including but not limited to situations in which such as when a refund must be issued back to the credit card. Key and/or Key's technical service providers maintain physical, electronic and procedural safeguards to protect your information, and Key and/or Key's technical service providers are required to follow these privacy standards, as well as the Payment Card Industry Data Security Standard (PCI DSS).



- **Disclosure of Your Information:** Key does not disclose any nonpublic information (such as credit card number and expiration dates) about our customers or former customers to anyone, except as required by law. Key may disclose such information only when it is necessary for the conduct of Company, State or Federal government business, or under circumstances where disclosure is required by law. Information may also be disclosed for audit purposes, to regulatory agencies or for other general administrative services. Key does not disclose information about you to other entities who may want to sell their products to you.

Third Party Websites

Users may find content on Key's Site that links to the sites and services of our partners, suppliers, government institutions, sponsors, licensors and other third parties. Key does not control the content or links that appear on these sites. Key is not responsible for the practices employed by websites linked to or from our Site. In addition, these sites or services, including their content and links, may be constantly changing. These sites and services may have their own privacy policies and customer service policies. Browsing and interaction on any other website are subject to that website's own terms and policies. This includes websites which have a link to Key's Site.

By using this Site, you signify your acceptance of this policy. If you do not agree to this policy, please do not use Key's Site. Your continuing use of the Site, following the posting of changes to this policy, will be deemed your acceptance of those changes.

Changes to this Privacy Policy

Key Background Screening, Inc. may update this privacy policy at any time. In addition, when Key does update, Key will revise the date at the bottom of this page. Key encourages users to frequently check this page for any changes. Always stay informed about how Key is helping to protect the personal information Key collects. Users acknowledge and agree that it is their responsibility to review this privacy policy periodically and become aware of modifications.

How to Contact Us

Should you have any questions or concerns about this privacy policy, please contact Key at:

Key Background Screening, Inc.
3711 Chester Ave.
Cleveland, OH 44114
Phone: 800-648-6148
compliance@keybackground.com

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