

Commitment to Privacy

SecurTest Privacy Policies and Principles

For more than 34 years, SecurTest, Inc. has taken great pride in our relationships with our clients, applicants for employment, employees of our clients, and the general public. We at SecurTest are dedicated to protecting your privacy and any personal or business information we obtain from you.

The Privacy Principles described herein are designed to answer your questions regarding our privacy policy. The terms of this policy apply to SecurTest's Web site and Background Screening Solutions, except where noted. SecurTest is a provider of information that helps businesses, non-profit organizations, and federal, state, and local governments make informed hiring and retention decisions. We screen applicants, employees and consumers, reduce fraud, mitigate risk, facilitate business decisions, and make our world safer, while protecting consumer privacy. These Privacy Principles will also help the consumer, applicant, or subject of our background screening programs understand how we use and safeguard their information, such as social security numbers and dates of birth.

Our Privacy Principles apply to Personally Identifiable Information, which includes Sensitive Personally Identifiable Information that is collected, maintained, used, or disseminated by SecurTest in delivering information products and services through any SecurTest company or line of business. Many of our products are already subject to important privacy protections provided by federal and state laws, such as the Fair Credit Reporting Act and its state law counterparts. We give careful attention to our privacy policies, which we review and change as necessary and appropriate. To underscore our commitment to privacy and our vision that good privacy is good business, we have adopted the following Privacy Principles. [\[1\]](#)

The policy includes our corporate privacy principles and Fair Information Practice Principles of notice, choice, access, security, and accountability. This online privacy policy applies to all sites owned and operated by:

SecurTest, Inc. * 2500 Daniells Bridge Road, Building 200, Suite 1-B * Athens, GA 30606

800-445-8001 compliance@securtest.com

Our Websites are:

www.securtest.com

www.iReviewNow.com

www.SecurHomeland.com

iReviewNow – the New Protection Standard

Our founder, Steven C. Millwee, is the inventor of the proprietary patented iReviewNow System (U.S. Patent 7,979,908) that helps applicants, employees, and consumers better protect themselves from inaccurate information and identity theft or fraud. At the same time,

iReviewNow provides employers, prospective employers, or other authorized organizations a better picture of an individual's background and qualifications. When a background investigation report contains adverse information that might impact a hiring, retention, employment, credit granting, insurance issuance, or other legal decision, iReviewNow becomes part of the report at the option of the client or consumer. Unless we are contracted to do so, our clients give the subject a copy of the adverse report and our iReviewNow in real-time to ensure compliance with the FCRA and other laws and rules. The subject immediately authenticates or disputes information and provides additional insight that will help the user of the report make informed decisions, while mitigating claims of inaccuracy, discrimination, and other types of misuse or abuse of the report.

Organizations using iReviewNow expand their pool of qualified applicants as they get real-time usable information authenticated by the subject. This helps mitigate risks and claims from consumers, applicants, and employees who otherwise must wait to receive a notice by mail of adverse information or decisions. Consumers, subjects of our background investigations and reports, and users of the reports can opt-in or opt-out of using iReviewNow. Using iReviewNow ensures the consumer sees his or her report at the same time as the prospective employer or user of the report.

Our patented iReviewNow allows consumers, applicants, employees and/or subjects of background reports to receive a copy of the report through secure online access, email, or mail when the subject does not have internet access. Our background screening solutions are the most transparent system, integrating the subject into the process.

LEGAL COMPLIANCE

SecurTest requires clients to adhere to all laws, including all federal and state laws, the Equal Employment Opportunity Commission (EEOC) and their state and local counterparts, and the Fair Credit Report Act, among any others that apply.

The Privacy Act of 1974, 5 U.S.C. § 552a, establishes a code of fair information practices that governs the collection, maintenance, use, and dissemination of personal information maintained in systems of records by federal agencies. A system of records is a group of records under the control of an agency from which information is retrieved by the name of the individual or by some identifier assigned to the individual. (SecurTest is not a federal agency as defined by the Privacy Act of 1974. However, our guiding principles use applicable or similar privacy rules that are listed in the Act, such as "No Disclosure without Your Consent" and our methods for safeguarding your information.)

INFORMATION COLLECTION

I. Personally-Identifiable Information

These sites only collect Personally Identifiable Information ("PII") from you based on your authorization, such as for a background investigation with an employer, prospective employer, government entity, or contractor of a government entity. PII collected with your consent may include, for example, name, e-mail address, resume information, address, telephone number, date of birth, social security number, driver's license or government identification numbers, or any

inquiries you may make directly through our websites or that you have authorized a SecurTest client to provide for a background report.

II. How We Protect Personally Identifiable Information

1. You must consent to provide PII information about yourself.
2. We collect PII information securely via secure online (internet), fax, mail, or other secure systems that only our clients, the consumer, and SecurTest can view.
3. We do not sell or redistribute your PII information to third parties. Except where required by our federal government clients, our background reports do not contain any PII information. Thus, the report does not include your date of birth or social security number. Where a federal government user, such as the Department of Defense (DoD) and its military branches, requires PII information in our background reports, the report can only be viewed through secure online access that meets the strict security procedures approved by the DoD.
4. We need your social security number, date of birth, address, name, maiden name, and other names to perform the background investigation. We also need your driver's license number if we are required to report your driving record. We use this information to check court and other government records to ensure that we find and only report information about you. An accurate background investigation cannot be performed without PII information, since a name match could result in reporting inaccurate information or information that is not your background or record.

III. Credit Reports

Some employers require a credit report as part of their application or employment requirements. We follow federal and state laws, including the Fair Credit Reporting Act (FCRA) and California laws, among others.

We strongly encourage consumers/applicants to check their credit reports free at <http://www.annualcreditreport.com>. Three credit bureaus collect and report credit information. Checking your credit before applying for employment or before authorizing a credit report allows you to identify any inaccurate information with these credit bureaus. SecurTest does not collect credit information and only reports the credit bureau report where you have authorized the report. SecurTest has no method to correct credit bureau reports, and as such, the consumer assumes all responsibilities for contacting credit bureaus if the credit file or report contains any inaccuracies.

IV. Cookies

“Cookies” are messages that web servers (computers that deliver web pages) exchange with web browsers (programs that support website interaction, such as Microsoft Internet Explorer). SecurTest uses these messages in our customer web applications to simplify and enhance the user experience. SecurTest does not store any personally identifiable information in cookies.

Cookies do not act maliciously on computer systems, nor can they be used to spread viruses or access your computer's hard drive.

V. Non-Personally Identifiable Information

This site also collects non-personally-identifiable information. For example, as you browse our websites, we may collect information about your visit, but not about you personally. Via web server logs, for example, we may monitor statistics, such as the number of people that visit our site, which pages are visited on our site, from which domain our visitors come (e.g., aol.com, hotmail.com, etc.), and which browsers people use to visit our sites (e.g., Netscape Navigator, Microsoft Internet Explorer, etc.).

INFORMATION USE AND CONSUMER CHOICE

The information collected by our websites is used only for responding to your inquiries or those authorized by you and our clients.

We may contact you in response to your comments or inquiries, as part of the maintenance of your account with us (if you have one), or in order to complete a background investigation or compliance process, which will assist in ensuring the accuracy of our reports and compliance with the Fair Credit Reporting Act, among other state and federal laws.

If you decide that you do not want to receive further e-mails from SecurTest, you can reply to the e-mail and place in the subject line, "OPT OUT." You may also call 800-445-8001 with a request that we not continue to e-mail you. We do not use outside data sources to enrich marketing data obtained online. We do not use any information about you, including email addresses, except in compliance with our duties and obligations.

ACCESS AND CORRECTION

As an information company, we value having our data as accurate as possible. Accordingly, we strive to maintain the accuracy of the information collected through our websites. As the inventor of iReviewNow, we have the only consumer-friendly transparent system for you to ensure background and consumer reports are accurate and accessible to you at the same time as the employer or entity you authorized for us to prepare a report. You are our most important tool in ensuring that their data is complete and accurate. We will provide you access to your personally identifiable information for as long as we maintain that information in an accessible format. Similarly, we permit and encourage you to correct inaccuracies in the information you submit to us through our websites, by email, telephone, or using iReviewNow. If you wish to correct any inaccurate information you have submitted to any of these sites, please go to www.securtest.com/ireviewnow.pdf or call (800) 445-8001.

SECURITY

We take steps to protect against the loss, misuse, or unauthorized alteration of personally identifiable information collected through this website. We recognize the importance of security for all personally identifiable information collected by our website. We exercise care in providing secure transmission of your information.

Once we receive personally identifiable information, we take steps to protect its security on our systems. In the event we request or transmit sensitive information, such as Social Security Numbers, we use accepted industry standards, such encryption programs and software.

We strictly limit access to personally identifiable information to those employees who need access in order to carry out their job responsibilities. All of our employees have undergone extensive background screening, FASTscreen testing, and have their criminal history reviewed every 90 days to ensure your information is in trusted hands.

POLICY CHANGES

We reserve the right to revise this policy as needed. As such, in the event revisions are made, we will prominently post announcements on our websites that describe the details of the revisions.

PERSONAL INFORMATION DISCLOSURE: UNITED STATES OR OVERSEAS

In preparing a consumer report or investigative consumer report, we only send information about the subject of the report outside the United States if our client asks for information from a jurisdiction outside the United States. For example, if a prospective employee worked outside of the United States, our client might ask for a criminal history report for the country in which the prospective employee worked. When we do this kind of report, we send enough information to identify the subject of the report. We do not send your personal identifier information outside the United States except where such is required to conduct a background investigation, which is authorized by the subject of the investigation.

OPT-OUT OPTION

You Can Opt Out of Receiving Further Marketing from SecurTest at any time.

We will send you information about our various products and services or other products and services we feel may be of interest to you. If you do not want to receive such mailings, simply tell us when you give us your personal information. Alternatively, at any time you can easily opt out of receiving further marketing from SecurTest by emailing us at optout@securtest.com. Please type "OPT OUT" in the subject line of your email.

CALIFORNIA PRIVACY RIGHTS

California Civil Code Section [1798.83](#) permits customers or subjects of our background reports (consumer reports) of SecurTest, Inc. who are California residents to request certain information regarding its disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an e-mail to CaliforniaRequest@securtest.com or write us:

SecurTest, Inc. California Consumer Protection Department
SecurTest, Inc. * 2500 Daniells Bridge Road, Building 200, Suite 1-B * Athens, GA 30606

Use of Credit Reports – California Residents

SecurTest generally does not provide credit reports where the subject of the report lives in California due to the recent law [Assembly Bill 22](#) that became effective on January 1, 2012. California clients requesting credit reports MUST ensure compliance with all applicable laws and provide proof of the need for a credit report as part of the consumer authorization. Employers must adhere to this California law, as there are strict rules and restrictions on ordering and using consumer credit reports for hiring or employment purposes. Clients with applicants or employees residing in California that require credit reports as part of the employment process are required to submit a separate authorization and statement of purpose that the subject of the investigation must sign when ordering such credit reports from SecurTest.

FOR MORE INFORMATION

For more information about our privacy practices or policies, please contact our Compliance Department:

SecurTest, Inc. * 2500 Daniells Bridge Road, Building 200, Suite 1-B * Athens, GA 30606

800-445-8001

compliance@securtest.com

FREQUENTLY ASKED QUESTIONS

How secure is my information?

SecurTest recognizes the importance of secure online transactions and takes steps to safeguard the privacy of information you provide through online forms. For your online authorization or use of iReviewNow, programs encrypt the information you provide on the request form before transmission to our secure computer systems. This information is decrypted only upon receipt by us. Physical, electronic, and procedural safeguards designed to guard your personally identifiable information are maintained in strict adherence to government and industry regulations and standards.

Further, our website's security protocols and measures are designed to protect the personally identifiable information you provide from unauthorized access or alteration. These measures include physical security, technological security measures, and encryption of certain information.

Is it safe to provide my Social Security Number or Date of Birth?

You must provide your Social Security Number and Date of Birth for us to conduct a background investigation. We use this information to ensure we only report records associated with you, as a name match could result in reporting information that is not your record. The site's security protocols and measures are designed to protect the personally identifiable information you provide from unauthorized access or alteration. As an added security measure, except when your report is transmitted to government users, such as the Department of Defense and its military branches, we do not report your date of birth and mask your social security number where no more than the last four digits are visible.

How does the online authentication process work?

To assure that we have your consent to conduct the background investigation, we require that you have signed an authorization form or given authorization by electronic signature. An electronic signature is a specific process wherein you consent to the background check, our policies, and our procedures as if signing the document. We authenticate your identity utilizing the personal identification information you provide, including, but not limited to, your Social Security number and date of birth. For

your protection, if your identity cannot be authenticated, you will receive further instructions on how to verify your identity. Failure to authenticate your identity is not an indicator of fraudulent activity or identity theft.

How can I learn more about guarding against internet fraud and protecting my personal information?

OnGuardOnline.gov provides practical tips from the federal government and the technology industry to help you be on guard against phishing and internet fraud, secure your computer, and protect your personal information.

How do I request a "fraud alert" be placed on credit file?

You have the right to ask that nationwide consumer credit reporting companies place "fraud alerts" in your file to let potential creditors and others know that you may be a victim of identity theft. A fraud alert can make it more difficult for someone to get credit in your name because it tells creditors to follow certain procedures to protect you. It also may delay your ability to obtain credit. You may place a fraud alert in your file by calling just one of the three nationwide consumer credit reporting companies. As soon as that agency processes your fraud alert, it will notify the other two, which then also must place fraud alerts in your file.

- ☎ Equifax: 1-877-576-5734; www.alerts.equifax.com
- ☎ Experian: 1-888-397-3742; www.experian.com/fraud
- ☎ TransUnion: 1-800-680-7289; www.transunion.com

Revision date: January 1, 2013

¹ Individually identifiable

Information from or about an individual consumer including, but not limited to: (a) a first and last name or first initial and last name; (b) a home or other physical address, which includes at least the street name and name of city or town; (c) an email address; (d) a telephone number; (e) a Social Security number; (f) credit and/or debit card information, including credit and/or debit card number with expiration date; (g) date of birth; (h) a driver's license number; or (i) any other information from or about an individual consumer that is combined with (a) through (h) above.

Download PDF Copy of these policies at <http://www.securtest.com/SecurTestprivacy.pdf>

SecurTest Safe Harbor Policy

EU and Switzerland Safe Harbor Privacy Policy

Last updated: 03/01/2013

SecurTest, Inc. ("SecurTest") participates in the Safe Harbor Program administered by the U.S. Department of Commerce ("the Department") for the transfer of Personal Information^[1] from the European Union ("EU") and Switzerland to the United States. As part of our participation in the Safe Harbor Program, SecurTest has adopted this policy ("Safe Harbor Policy"), which is consistent with the Safe Harbor Privacy Principles published by the Department. Our Safe Harbor Policy also reflects, where applicable, the requirements of the Fair Credit Reporting Act, 15 U.S.C. §§ 1681 et. seq., (the "FCRA") and its state law counterparts, which regulate many of the Personal Information products offered by SecurTest (i.e., consumer or background investigation reports). In the event of any conflict between this Safe Harbor Policy and our obligations under the FCRA or other laws, the law will control.

Please note that in certain cases, consistent with the Safe Harbor Program, the notice, choice, and onward transfer principles below do not apply in cases where SecurTest is transferring public record information from the EU or Switzerland to the U.S. without combining that information with nonpublic information, or in cases where SecurTest is transferring publicly available information that has not been restricted by the transferor. However, as noted above, SecurTest complies with the FCRA when applicable.

NOTICE: SecurTest seeks to inform individuals, either directly or by requesting our customers to do so, about the purposes for which we collect and use Personal Information about them, how to contact us with any questions or complaints (as seen below), the types of third parties to which we disclose Personal Information, and the choices and means we offer individuals for limiting the use and disclosure of Personal Information. In addition, SecurTest provides additional notices that may be required by the FCRA either directly or through its customers.

SecurTest, for example, collects, maintains, uses, and discloses Personal Information about consumers in connection with the preparation of reports for government agencies and employers and their joint users and agents, such as staffing firms or recruiters. These reports are used for employment eligibility determinations or access control privileges, including for purposes of evaluating a consumer for employment, promotion, reassignment, or retention as an employee. Personal Information, for example, may be collected, maintained, used, and disclosed in the performance of background checks on applicants and employees; for purposes of verifying prior employment and credentials such as education history and professional licensure and conduct; and investigations of possible employee misconduct.

CHOICE: It is our policy to provide individuals with clear and conspicuous, readily available, and affordable mechanisms to exercise choice. Consistent with FCRA requirements, SecurTest

requires subscribers to obtain the written authorization of the consumer before furnishing a consumer report for employment purposes.

In the event we collect Personal Information from the EU or Switzerland specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or information specifying the sex life of the individual—we would provide consumers affirmative (opt in) choice if the information is to be disclosed to a third party or used for a purpose other than those for which it was originally collected or subsequently authorized by the individual through the exercise of opt in choice. We also make reasonable efforts to treat Personal Information as "sensitive" if a third party providing us with that Personal Information treats and identifies it as being sensitive.

In the case of other Personal Information other than consumer report information, we offer individuals the opportunity to choose (opt out) whether their Personal Information is (a) to be disclosed to a third party (other than our agents and contractors) or (b) to be used for a purpose that is incompatible with the purpose(s) for which it was originally collected or subsequently authorized by the individual. Finally, we allow individuals to opt-out of certain products and services as required by law and SecurTest policies. For information about opt-out opportunities contact us by telephone at 1-800-445-8001 or by e-mail at compliance@SecurTest.com

ONWARD TRANSFER: Our disclosure of Personal Information to third parties will be done in compliance with the notice and choice principles above, where applicable, and, in cases where SecurTest is providing the third party with a consumer report, we comply with FCRA requirements.

In the event that we disclose Personal Information to our agents or contractors we either enter into a written agreement with the agent or contractor requiring that they provide at least the same level of privacy protection as is required by the Safe Harbor Privacy Principles or verify that other appropriate legal controls are in place to safeguard Personal Information.

SECURITY: We take reasonable precautions to protect Personal Information from loss, misuse and unauthorized access, disclosure, alteration, and destruction. We strive to protect Personal Information which we maintain or disseminate so it is not obtained by unauthorized individuals or used in unauthorized ways. We strive to know that our customers are legitimate and verify that they have an appropriate and lawful purpose for obtaining information. We continue implementing and updating security safeguards, as appropriate.

DATA INTEGRITY: We take reasonable steps to ensure that data is reliable, relevant for its intended use, accurate, complete, and current. We also strive to assure that every source we use is reputable and reliable.

In the case of consumer reports, SecurTest has developed procedures to comply with the FCRA's requirements regarding the accuracy of the information contained in consumer reports;

restrictions on the information that can be included in consumer reports; and requirements regarding the reporting of certain public record information and the provision of contemporaneous notice to consumers that such information is being provided to an employer, if the information is not complete and up to date when it is provided.

ACCESS: We strive to provide consumers with access to Personal Information about them that we hold and to allow consumers to correct, amend, or delete that information where it is inaccurate, except where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy in the case in question, or where the rights of persons other than the individual would be violated. As an example, we hold the patent for iReviewNow, which allows consumers free access to their consumer reports prepared by SecurTest at no charge. A consumer can dispute any information in the report, explain any information, and self-improvement steps by using iReviewNow. In some cases, depending upon the nature of your request and the Personal Information involved, we may need to direct you to the party that provided the data to us (such as our customer or a public record repository). We will respond to consumers' requests' within 30 days.

In the case of our FCRA-regulated products, consumers have specified rights under the FCRA to obtain Personal Information that we maintain in their file. Consumers also have specific rights under the FCRA to dispute the accuracy and completeness of Personal Information in their file. For additional information see www.ireviewnow.com or www.securtest.com.

ENFORCEMENT: We take steps internally to verify that our privacy promises have been implemented as presented and take appropriate steps to remedy any deficiencies that we may identify.

The Federal Trade Commission is the federal agency primarily responsible for enforcing the FCRA, including with respect to consumer reporting agencies such as SecurTest. Additional information is available at <http://www.ftc.gov/privacy/privacyinitiatives/credit.html>.

We participate in the U.S.-EU and U.S.-Swiss Safe Harbor Frameworks as set forth by the Department of Commerce for SecurTest. As part of our participation in the Safe Harbor program, we have agreed to Better Business Bureau Atlanta Online Dispute System (<http://atlanta.bbb.org/european-dispute-resolution/consumer/>) for disputes relating to our compliance with the Safe Harbor Frameworks.

Additional information about obtaining an FCRA file disclosure and the procedures for disputing the accuracy or completeness of information in your file is available at www.ireviewnow.com, www.securtest.com, or by contacting us at 1-800-445-8001 or by e-mail at compliance@SecurTest.com.

¹ "Personal Information" for purposes of this policy means any information relating to an identified or identifiable natural person ("data subject"); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity that are within the scope of the EU Privacy Directive, received by SecurTest from the EU, and recorded in any form.