

## Privacy Policy Consumer Information

**National Background Investigation Inc** is a consumer reporting agency. It is required by the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.* ("FCRA") to maintain the confidentiality of all consumer information.

**National Background Investigation Inc** obtains information on an individual consumer only upon the request of a user who has a permissible purpose under the FCRA to request information on that consumer in order to provide consumer reports. The FCRA requires a user for employment purposes to certify to us that it has a permissible purpose for the report and has obtained the written consent of the consumer to request information before we can supply the requested information.<sup>1</sup> The user must submit to reasonable audits by us to confirm that it is, in fact, obtaining such consents. All users must certify that they have a permissible purpose to request a report such as credit, insurance, and renting an apartment. Our customers agree to keep your information confidential and secure.

**National Background Investigation Inc** does not maintain a database of consumer information.

Personal Information Disclosure, United States or overseas. We do not send consumer information outside of the United States or its territories for any purpose other than to deliver a report to an end user. Of course, if information is sought from outside of the United States, Personal Identifying Information is transmitted in compliance with both the US-Swiss Safe harbor Policy and the EU-US privacy shield. The information is gathered in that country and then transmitted to us here in the United States where it is treated as any other consumer information.

Any information gathered on any consumer may only be provided to the user authorized by the consumer or permitted by the FCRA or similar state law to receive the information. We cannot and do not share, sell or distribute consumer information with or to any third party other than the requesting party thereof. Any consumer, upon proper identification, has the right under the FCRA to request us to furnish to the consumer any and all information we may have on that consumer. The consumer has the right to dispute the accuracy or completeness of any information contained in the consumer's file.

However, we may be required, upon receipt of a court order to release the information in civil litigation, or as otherwise required by law, to disclose information regarding a consumer to law enforcement agencies.

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<sup>1</sup> There is an exception for employer investigations of suspected employee misconduct or for compliance with law or employer policies, e.g., sexual harassment investigations.

If you have any questions regarding our policy, you may contact our Chief Privacy Officer at:

Other privacy initiatives and procedures include, but are not limited to:

- Access to confidential consumer information is limited within **National Background Investigation Inc** to those who have a need to know the information: obtaining and transmitting information on the consumer or those dealing with a consumer request for information or consumer disputes.
- Access to **National Background Investigation Inc** computer terminals, file cabinets, fax machines, trash bins, desktops, etc. are secure from unauthorized access.
- **National Background Investigation Inc** maintains a secure network to safeguard consumer information from internal and external threat.
- Any backup data is maintained in an encrypted form.
- **National Background Investigation Inc** maintains records on each request for information and identifies each user who requested information on a consumer.
- Employees are prohibited from “browsing” files or databases without a business justification.
- Destruction of consumer information follows the Federal Trade Commission's requirements that the information be unreadable upon disposal.