



1STWEST BACKGROUND DUE DILIGENCE PRIVACY POLICY

As a leading provider of global background investigations, 1STWEST Background Due Diligence and / or its Affiliates (1STWEST) – including Ignite Diligence™ takes very seriously our obligation to protect information entrusted to us by our clients. 1STWEST takes strong measures to safeguard personal and company information through our business practices with respect to its collection of personally identifiable information (PII) and its use and disclosure of that information in the course of providing background investigations. Note that more specific privacy practices may apply depending on the background screening products or services obtained from us, or the jurisdiction in which the subject(s) of our background screening is searched. Where more specific practices apply, we will notify the data subject of those practices when information is collected from the data subject.

COMPLIANCE WITH PRIVACY LAWS AND REGULATIONS

1STWEST adheres to all federal laws and requirements including but not limited to: the Fair Credit Reporting Act (FCRA); the Gramm-Leach-Bliley Act (GLBA); the Driver's Privacy Protection Act (DPPA); the Equal Employment Opportunity Commission (EEOC), and the fair information principles published by the Federal Trade Commission (FTC). 1STWEST also maintains policies and procedures in aspects of its operations to protect the privacy of consumers and our clients. 1STWEST adheres to all applicable information technology security, privacy laws and regulatory requirements including: federal and state laws; regulations; rules; ordinances; guidelines; and judicial and administrative orders governing background investigations and pre-employment screening.

1STWEST CONSUMER REPORTS AND INVESTIGATIVE CONSUMER REPORTS

1STWEST performs background investigative services that constitute consumer reports and investigative consumer reports. Under the FCRA, 1STWEST is defined as a consumer reporting agency (CRA). 1STWEST maintains policies and procedures designed to limit the purposes for, and circumstances under which, it furnishes such reports. 1STWEST follows reasonable procedures to ensure maximum possible accuracy of the information regarding the subject (consumer) of the report, and will conduct reinvestigations of disputed information at the consumer's request. 1STWEST provides consumers with means to, upon proper identification, request access to information that we have collected about them. Any consumer may exercise his/her right to inspect any data about him/her, and to object to any data pursuant to the FCRA and applicable state law.

[Click here for a summary of your rights under the FCRA.](#)

COMPLIANCE WITH INFORMATION TECHNOLOGY SECURITY

1STWEST takes very seriously the protection of sensitive and confidential information during our background investigation processes, from start-to-finish. We take all reasonable administrative, technical, physical and managerial procedures to protect PII from loss, misuse, unauthorized access, disclosure, alteration and destruction. We maintain strong privacy and data security policies and practices, including password controls based on length, complexity and unpredictability.

We employ strong information technology (IT) security throughout our background investigation processes to insure that your confidential information is always secure and unapproachable. Our logical and physical IT security processes are monitored, reviewed and audited on an ongoing basis by our in-house IT Security and Compliance staffs and are compliant with ISO - International Organization for Standardization and IEC - International Electrotechnical Commission 27002 standards, as well as applicable regulatory government agencies IT security guidelines.

In addition, 1STWEST employs highly credentialed independent IT governance, risk, compliance and audit firms, serving as a trusted advisor to assist us in recognizing and controlling IT related risks and maintaining compliance with all major industry and government standards. As a Third Party Services Supplier, 1STWEST is compliant with applicable regulatory guidelines mandated by governing agencies, such as the Office of the Comptroller of the Currency (OCC).

TYPES OF PII COLLECTED

1STWEST collects PII that our clients and the subjects of background investigations provide to us, only as permitted by law and necessary to perform our background screening services. The types of PII collected may include personal contact details, employment history (including performance and discipline), employment identification number, salary and benefits information, educational and other credential information, and other information about you that could be deemed Sensitive pursuant to applicable local law (such as criminal history or credit report information).

We collect information from various public records sources, licensed databases and court records as permitted by law. We also collect information from our clients and others in the course of conducting public records searches using the Internet, additional sources including commercially available third-party sources, and credit reporting agencies. We may combine this information with the personal and other information we have collected about the data subject.

CONSENT

1STWEST only collects PII, as described in this Privacy Policy, with the consumer's explicit consent. Additionally, the Service only operates when a consumer explicitly identifies those past employers, educational institutions, or other credential granting organizations from which PII may be collected. The information collected by 1STWEST is only utilized for the purpose described in this Privacy Policy.

In the event a consumer wishes to opt-out of any use of PII collected by 1STWEST, a consumer can notify 1STWEST that permission for use of the data is withdrawn here 1stwest@1stwest.com.

That does not mean that if a consumer opts-out that the PII is erased or deleted. In the event of a withdrawal of consent, the PII will not be forwarded or utilized by this service for employment screening purposes. However, PII collected by 1STWEST may still be retained or used as permitted by law, or required by contract.

USE OF PII COLLECTED

1STWEST uses PII for purpose of providing PII to employers for employment related decisions. The information may also be provided to agents of employers such as recruiters or staffing firms. The data that is collected on individuals is used to provide employers with employment background checks and credentials verification on potential job applicants or current employees. The information is used by employers to make decisions on whom to hire, retain, or promote. It may also be utilized to conduct employee investigations where an employer has a suspicion of work related misconduct or wrongdoing.

1STWEST limits use of the information collected in its background investigations process for the permissible purpose for which it is provided and as described in this Privacy Policy. We use information provided to us by our clients and collected on individuals and entities pursuant to their authorization to conduct public records research relevant to background investigations. Each client has certified a permissible purpose for conducting a background investigation and has certified to us that they will protect PII and use it only for the purpose for which the information was collected.

We retain independent contractors or other third-parties to obtain public records information for client-requested background investigations. We share personal information only in circumstances where such sharing is required or permitted by law in accordance with any applicable confidentiality agreements and our policies and practices.

DISCLOSURE OF PII COLLECTED

Except as otherwise specified in this Privacy Policy, the PII obtained by 1STWEST is forwarded only to an entity that has been authorized by a consumer to receive the data, or an agent of the client operating on behalf of the client. The recipient of the PII may be in either the United States, or another country.

1STWEST may disclose PII to service providers providing services directly to 1STWEST without your consent. These service providers are required by law or contract to only use any PII as directed by 1STWEST, and maintain sufficient protections of such PII so they comply with the requirements of this Privacy Policy.

The PII obtained by 1STWEST is only provided to the requesting entity for purpose described in Privacy Policy. 1STWEST may also operate as an agent for a Consumer Reporting Agency as defined under the FCRA. In either event, the requesting entity or the CRA must certify that the information will be used only for a permissible purpose as defined by the FCRA and that the information will remain private and confidential. 1STWEST also takes reasonable steps to insure that any party that receives such information has certified that it will maintain privacy and confidentiality and will only utilize the information for purposes described in this Privacy Policy.

Finally, we may transfer your PII to regulatory authorities (including tax authorities), government agencies, parties (including the Company's legal or other advisors) in legal proceedings involving 1STWEST, third parties with whom 1STWEST may collaborate or engage in acquisition transactions, or as otherwise required or permitted by applicable law.

DATA RETENTION

Various laws require that 1STWEST maintain the PII in the Service for a period of time for the protection of the individual. Where the PII is collected for employers in the United States the 1STWEST Service will retain PII for six years as required under the FCRA. 1STWEST will retain PII as required by applicable law or contract

1STWEST PRIVACY AWARENESS, TRAINING, AND ACCOUNTABILITY

1STWEST holds our employees, third-party vendors and suppliers to our same high standard. 1STWEST maintains a privacy awareness policy and a training program as it relates to the collection and use of personal information. We hold our employees accountable for complying with relevant policies, procedures, rules and regulations concerning the privacy and confidentiality of information.

1STWEST OFFERS THE OPPORTUNITY TO ACCESS AND CORRECT INFORMATION ON FILE WITH US

1STWEST CONTACT INFORMATION

For a copy of this policy or for questions regarding this policy, please contact us by email at 1STWEST@1STWEST.com, by telephone at 866-670-3443, by mail at 1STWEST Background Due Diligence, 1536 Cole Blvd., Suite 335, Lakewood, CO 80401

If you are a consumer who wants to dispute the accuracy or completeness of information contained in a consumer report/investigative consumer report prepared by 1STWEST, please contact 1STWEST at 866-670-3443, via email at 1STWEST at 1STWEST@1STWEST.com, or by mail at 1STWEST Background Due Diligence, 1536 Cole Blvd., Suite 335, Lakewood, CO 80401, Please indicate which part(s) of the report you are contesting, the reasons you believe the information is incorrect or incomplete, and any other information you deem relevant to your dispute. We will promptly investigate your dispute and, in most cases, advise you of the results within 30 days of receipt.

If 1STWEST has prepared a consumer report on you, and you would like to receive a free copy of the report or your consumer file from 1STWEST, please also contact 1STWEST using the contact options noted above.

REVISIONS, UDATES OR CHANGES TO THE POLICY

1STWEST may revise, update or change this policy to reflect changes to applicable privacy laws and regulations, as to reflect changes in 1STWEST business practices. This policy will placed on our Website at www.1STWEST.com and will state the dates of the latest revisions and the effective date of any changes at the end of the policy.

Effective Date: March 10, 2016

Last Revision: March 10, 2016