



CONSUMER INFORMATION PRIVACY POLICY

Abstract

Protecting consumer information is important to Avesta. The Privacy Policy outlines Avesta's background screening general policy and practices for protecting consumer information.

Effective Date: January 1, 2017

I. Introduction

Protecting consumer information is important to Avesta. Avesta adheres to the Fair Credit Reporting Act (FCRA) and Drivers Privacy Protection Act (DPPA). When and where applicable, we also adhere to state laws related to consumer reports, consumer reporting agencies, driver information and other personal information.

This Consumer Information Privacy Policy outlines our general policy and practices for protecting consumer information, including the collection and intended use of information, the sharing of information, and how the information is stored and destroyed. This policy applies to all consumer information received by Avesta whether in electronic, paper, or verbal format.

By providing Avesta with personal information and authorizing the background investigation, the consumer is agreeing to the terms and conditions of this Consumer Information Privacy Policy. Avesta reserves the right to change this Privacy Policy at any time. Your continued use of this site after any change in this Privacy Policy will constitute your acceptance of such change.

II. Purpose

Avesta collects consumer information to conduct a Consumer Report and/or an Investigative Consumer Report. A consumer is informed of the particular purpose for which Avesta and/or our Client (the “end user” of a Consumer Report) collects and intends to use the information at the time the consumer completes the Background Check Disclosure and Authorization Form.

Information is collected for the purpose of conducting a background check for employment-related purposes, or for another purpose as authorized by the consumer. Individuals who wish to limit the use of their Personal Information, or who do not wish to be the subject of a Consumer Report and/or Investigative Consumer Report, should not provide it to Avesta and/or our Client, and should not complete the Background Check Disclosure and Authorization Form.

III. Information Collection

Access to certain Avesta web pages and online services is not available to the general public and requires a unique URL to access the form to offer personal information. Avesta collects only information that the user voluntarily shares with Avesta for employment purposes.

By using any of Avesta’s software, Avesta collects the information requested on the provided forms, which may request confidential information and financial information, including:

- Full name
- Home address
- Email address
- Telephone number
- Date of Birth
- Social Security Number
- IP address
- Vehicle registration plate number (If requested by Client)
- Driver's license number (If requested by Client)

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- Birthplace (If requested by Client)
- Name of the school they attend or workplace (If requested by Client)
- Grades, salary, or job position (If requested by Client)
- Criminal record (If requested by Client)
- Banking Information (If requested by Client)

Confidential information is only requested on behalf of our clients at their specific request so that they may fully consider your application for employment.

All Avesta employees with access to consumers' confidential information have cleared background screening and have been trained in the handling of such information. Avesta takes all measures reasonably necessary to protect against the unauthorized access, use, alteration or destruction of potentially personally-identifying and personally-identifying information.

Avesta does not maintain physical or electronic copies of sensitive consumer data outside of its software. Any information printed for business purpose, such as a verification fax, is destroyed at the conclusion of the business day or secured in a locked location; further explained in Section VI.

IV. Security

Avesta is committed to protecting the personal information that Avesta receives about consumers. While Avesta cannot guarantee the complete security of that information, Avesta utilizes a combination of online and offline security technologies, procedures and organizational measures to help safeguard consumer information against loss, misuse, and unauthorized access, disclosure, alteration and destruction.

Prior to granting authorization into the system, Avesta requires an established company representative to explain position and minimum access needed to complete position requirements. This serves as Avesta's safeguard against unauthorized browsing of consumer information.

Avesta employs Secure Socket Layer (SSL) data encryption when data is transmitted over the Internet. Avesta has installed layered firewalls and other security technologies to help prevent unauthorized access to its systems. Strong password protection protocols are used on all company computers, and employees are kept up-to-date on Avesta security and privacy policies. The servers used to store consumer information are maintained in a secure environment with appropriate security measures.

V. Sharing of Consumer Information

Avesta does not sell or disclose consumer information to third parties for a purpose other than for which it was originally collected, except as stated within this policy. We limit the dissemination of consumer information to those with a legitimate business need and permissible purpose, or as otherwise authorized by the consumer. Consumers are hereby notified that their personal information may be disclosed to a third party in conjunction with an authorized background check. Consumers who wish to opt out from the sharing of their information should not provide their information to Avesta and/or our Client, and should not complete the Disclosure and Authorization Form.

We may disclose consumer information: (1) to our corporate affiliates or service providers as necessary or appropriate to provide the product or service requested by our Client; (2) to the extent necessary or appropriate to government agencies, advisors, and other third parties in order to comply with applicable laws or regulations, or if such action is necessary to protect the rights, property or legal

claims of Avesta, its affiliated companies, clients, individuals or the public; (3) in the event of an actual or contemplated transaction by which Avesta or our assets are acquired by another company.

In the event that Avesta is acquired, or in the unlikely event that Avesta goes out business or enters bankruptcy, user information would be one of the assets that is transferred or acquired by a third party. The consumer acknowledges in reading this document that such transfers may occur, and that any acquirer of Avesta or CandidateCare may continue to use the consumer's personal information as set forth in this policy.

VI. Information Storage and Destruction

Avesta retains consumer information in a confidential manner, including but not limited to encrypting confidential information within our systems or partially redacted confidential information. We take reasonable steps, including physical, electronic and operational measures, to protect the information from loss, misuse, unauthorized access, disclosure, alteration, and/or destruction.

Avesta's commitment to protecting consumer information includes the proper disposal of the information to render it inaccessible, unreadable, and/or unrecoverable. In compliance with the current Federal Trade Commission guidelines, this may include (1) burning, pulverizing, or shredding paper documents, (2) destroying or erasing electronic files and (3) utilizing the services of a reputable document destruction company.

VII. California Do Not Track Disclosures

In line with California Online Privacy Protection Act (CalOPPA), Avesta discloses the categories of personally identifiable information collected and categories of third parties with whom Avesta may share personally identifiable information as listed in Section III and Avesta's protection against unauthorized browsing as detailed in Section IV. As stated early in the document, in some instances, Avesta may collect non-personal (e.g., aggregate or demographic) data through cookies. Avesta does not track activity through the background screening software.

Consumers can edit their personally identifiable information by calling (866)342-4280. An Avesta background screener will personally assist you with your request.

VIII. Contact Information

Questions, comments, complaints, or requests for assistance regarding Avesta's Consumer Information Privacy Policy or data collection and processing practices can be addressed to:

Avesta Systems, Inc.
Attn: Consumer Information Privacy Policy
5601 Hudson Dr. Suite #200
Hudson, Ohio 44236

Phone: 1(866)342-4280 or 1(330)650-1800