



SOP No.	isp013	Imp. Date:	09.28.16	Applies:	All
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Title:	Privacy Policy
Description:	The Company Privacy Policy to provide when requested and to display on company's public website.

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A-Check Global Privacy Policy

Scope of this Privacy Policy

A-Check America, Inc. (doing business as A-Check Global) and its affiliated companies and subsidiaries (collectively "A-Check") respect your privacy. A-Check Global is a corporation defined as a Consumer Reporting Agency by the federal Fair Credit Reporting Act processing consumer reports for the permissible purpose of performing background checks on job applicants (Report Subject) for employers (End Users). To process a consumer report it becomes necessary to utilize information technology to procure personally identifying information from consumers to not only verify identity but also to be used as identifying information when reporting public record, private record and information procured via interview. A-Check Global executes its business model utilizing a comprehensive Information Security Policy described in detail below.

Choice and Consent

Personally Identifying Information (PII) is collected solely for the permissible purpose of employment screening for employer clients (End users) who certify that purpose to A-Check. PII is only procured after an unambiguous Disclosure has been provided to and an Authorization form has been signed by the Report Subject. All Report Subjects under the age of 18 follow a specific process requiring parental consent to continue with the background check process. Other than age, A-Check systems act the same for all applicants regardless of the selections made of the system.



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Types and Purpose of Information We Collect

All information collected by A-Check is utilized for the sole purpose of compiling a consumer report (background check) on a Report Subject requested by our employer client. Information is used for this sole purpose. [A-Check does not sell or provide the data we collect for any other purpose therefore our systems are not equipped with an opt out.](#) Personal data is collected directly from the consumer or the employer client and includes but is not limited to:

Type	Purpose
Name	For identification purposes for all services performed
Date of Birth (DOB)	Primarily utilized for criminal records research – The DOB is truncated on A-Check’s final report
Social Security Number (SSN)	For U.S. consumers, A-Check utilizes the SSN to access credit bureau information, access employment and education records, and very occasionally for criminal record research – the SSN is truncated on A-Check’s final report
Driver’s License Number (DL)	The DL number is utilized to access Driving Records (MVR) from the appropriate state DMV – The DL Number is truncated on A-Check’s final report
Address History	Consumer addresses are utilized to determine jurisdictions for criminal record research in addition to providing the consumer with a copy of their report and to determine the appropriate regulatory standard for reporting information
Employment History	Used to perform verifications of employment
Education History	Used to perform verification of education
Professional License Numbers	Used to perform verification of a Professional License
International Identification	For non U.S. consumers, A-Check utilizes their National Identification Number to access credit, criminal, and sometimes driving information – International Identification numbers are truncated on A-Check’s final report

Note: A-Check Global also collects information associated with Cookies to monitor systems for security. For more information regarding A-Check’s use of cookies, please review the company’s [Cookie Policy](#).

Security of Data

A-Check’s Information Security Policy is modeled after the National Institute of Standards and Technology (NIST) framework **(1) Identify** – all data is categorized and assigned an owner and risk assessments are performed quarterly; **(2) Protect** – Access Control (Physical & Logical), Encryption for both data at rest and data in transit, Safeguards like Hardening & Patching, Employee Training, Contractual agreements with all vendors and clients, and a fully documented Software Development Life Cycle (SDLC); **(3) Detect** - A-Check systems are monitored utilizing Google Analytics, Session log monitoring, and both Intrusion Prevention &



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Detection Systems; **(4) Respond** - A-Check is required by state and international laws to report all security incidents that result in harm to consumers the company keeps data on. To ensure full compliance, A-Check maintains a comprehensive Response Plan to ensure an efficient process for handling the full scope of a data security incident; and **(5) Recover** – A-Check maintains a comprehensive Business Continuity / Disaster Recovery Policy to minimize the impact of any service disruptions.

Data Storage, Retention and Destruction

A-Check Global strives to be a green company and minimizes the use of paper in the company screening process. However, A-Check does keep a small amount of information in hard copy utilizing a triple lock policy – (1) locked file cabinets; (2) locked storage room; and (3) locked facility. Once information in hard copies is either no longer needed to compile a consumer report or no longer needed to comply with regulatory retention requirements, hard copies are placed in locked waste bins within our secure facility and are shredded onsite and disposed of by a bonded document destruction company. Electronic information (company databases) is retained and archived according to the company retention policy in a secure environment, available only to the Report Subject or to the employer client who procured the report for auditing purposes.

Access to Consumer Report Information

Consumer reports compiled by A-Check may be requested only by the employer client who originally ordered the report, or by the Report Subject. Report Subjects can obtain a copy of the consumer report at no charge by submitting an [Online Report Request Form](#) or contacting A-Check's Compliance Department by telephone - 877-345-2021. Identifying information is required (e.g., copy of driver's license) to request a copy of the final consumer report. Requests are typically completed within 48 hours of the submittal.

Disclosure to Third Parties

The information collected by A-Check is not used for any other purpose. It is not sold or distributed to any other parties, or used to compile direct mail lists. A-Check does not conduct investigations for Private Investigators, Attorneys, private parties, bill collectors or, for businesses operated solely out of homes (with certain exceptions).

However, A-Check does disclose Personally Identifying Information (PII) to entities including but not limited to information furnishers, consumer reporting agencies, courthouses, educational institutions, DMVs, and employers. PII that is disclosed is minimized to only the criteria needed to procure the background information being held by the source and is only disseminated utilizing secure systems.

Data Integrity and Data Quality

The quality of data is imperative to the success of A-Check's business model. Data collection systems are equipped with user-defined data types when applicable and automated services recognize inaccurate data inputs and create alerts in the process. A-Check's dedicated Quality Control department executes a final inspection process before the final consumer report is disseminated to the client and A-Check's dedicated Compliance



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Department are available for Report Subject's to dispute information in an expedient manner.

Monitoring and Enforcement

A-Check Global takes the security and privacy of consumer information very seriously. At A-Check Global, the confidentiality of the information entrusted to us is of utmost importance. Our staff is under strict confidentiality and compliance agreements, as are our clients and vendors. All data collection, storage and utilization procedures practiced by A-Check Global are in compliance with all applicable laws, which include the United States Federal Fair Credit Reporting Act (FCRA), individual state or province consumer reporting and privacy laws, the European Union General Data Protection Regulation and all other national laws, as applicable.

A-Check Global is committed to protecting the privacy of the data we collect, process, and archive. The A-Check process flow is carefully and continuously monitored to ensure full compliance from employees, vendors, and clients in addition to all systems being monitored for intrusion.

Transfer of Data out of the U.S.

A-Check Global is a consumer reporting agency with a comprehensive network of researchers and vendors providing the ability to obtain information from more than 200 countries and territories all over the world. To procure information from such a wide scope as the entire globe, A-Check is required to comply with regional, country, state, and local municipality law regarding data security and permissible purpose requirements governing access to information.

A-Check only transfers Personally Identifying Information out of the United States when conducting an international background check; A-Check does not utilize out of country call centers to process domestic background screening. For international background checks, A-Check takes great care to ensure full compliance with local laws and customs. In addition, A-Check carefully and comprehensively vets out all vendors and researchers prior to engaging in a contractual relationship to research and provide information back to A-Check.

Privacy Policy Available in Alternative Format

A-Check Global's Privacy Policy is also available as a [PDF document](#).

Changes to Privacy Policy

This Policy may be modified as a result of amendments to the law or regulations or due to other reasons. In such case, an amended Policy will be posted on A-Check Global's website at www.acheckglobal.com. The page providing the Policy shall contain a date as to when the Policy was last updated.



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Privacy Officer Contact Information

Questions, comments or concerns about A-Check Global's privacy policy and practices or for more information about A-Check Global's Information Security Policy please contact:

Contact:

Privacy Officer / [Data Security Committee](#)
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Document Control

Distribution List

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Data Security Committee	DSC Folder; Intranet, Website

External documents references

Title
Policy01 - Information Security Policy

Version History

Date	Version	Comments	Author
09.28.16	1	Original document	GH
10.03.18	2	Aligned policy with SOC2 requirements	GH
04.23.19	3	Updated specifics to policy; what we collect & how we protect	GH