

## CONSUMER INFORMATION PRIVACY POLICY

At FirstPoint Background Screening Resources ("FirstPoint"), we value the trust you place in us and are committed to respecting your privacy and the protection of your personal information.

As a consumer reporting agency governed by the federal Fair Credit Reporting Act (FCRA) among other applicable state and federal laws, FirstPoint is committed to protecting your privacy.

This Privacy Policy covers FirstPoint's website, and FirstPoint's practices for handling personal information provided to FirstPoint over the Internet by the general public using FirstPoint's publicly available website. This Policy also covers personal information provided by FirstPoint's clients, and their job applicants and employees (as well as other individuals who have given their written authorization for FirstPoint's clients to conduct a background investigation on them), using FirstPoint's online background screening solution that is accessible only through an access-restricted portion of FirstPoint's website. FirstPoint will collect, store, and use personally identifiable information only in compliance with applicable law, including the FCRA.

### Information Collection

Unlike large-scale data wholesale operations, we do not accumulate and mine data. Our focus is gathering the data requested by our clients and delivering that data to them via a secured network. This transactional process allows us to meet our customers' needs while protecting and maintaining the privacy of both our customers and the data they are requesting.

When you browse FirstPoint's publicly accessible website we generally collect personally identifiable information from you only if you choose to provide this information to us. However, in some instances, FirstPoint may collect data through cookies and other technological means normally associated with the operation and maintenance of the website. This information is used to better understand and improve the usability, performance and effectiveness of the FirstPoint's website, as is further described below under "Cookies and Tracking Technology".

The types of personal information we may collect directly from you through our publicly accessible website include the following (should you decide to provide such information to FirstPoint): (a) contact and identifying information (e.g., name, address, e-mail address, phone and fax numbers, employer(s), job title) and (b) any other personal information that you may voluntarily provide to us in an online form or through an e-mail. In addition, the FirstPoint may automatically collect information related to your use of the website as is further described below under "Cookies and Tracking Technology".

Access to certain FirstPoint web pages and online services is not available to the general public and requires a login code and password provided by FirstPoint. Those web pages, and the information downloadable to and from those pages, are made available only to clients of FirstPoint. On these web pages, FirstPoint collects only information that the user voluntarily shares with FirstPoint.

## **How We Use Your Personal Information**

When your personal information is collected directly from you on FirstPoint's publicly accessible website, FirstPoint will inform you at the point of collection of the purpose for the collection. FirstPoint will use your personal information only in the way we specify when it is collected unless you consent to a different use. Note that the way we use your personal information which is collected automatically is further described below under "Cookies and Tracking Technology".

For example, FirstPoint may use personal information submitted in a form to set up and maintain your account. FirstPoint also may use the personal information you provide to answer your questions and inquiries.

If FirstPoint has received your personal information in connection with a background screen ordered by FirstPoint's client - FirstPoint may use your personal information to perform your background screen for that client. FirstPoint will not use your information to conduct a background screening investigation and create a report unless FirstPoint's client has provided a certification required by the FCRA and any other applicable law. In this certification, FirstPoint's client certifies to FirstPoint that it has a legally permissible purpose for ordering the background screen, and that it has, to the extent required by applicable law, obtained your informed consent to conduct the background screen.

## **Information Sharing and Disclosure**

FirstPoint will not disclose your personal information to a third party without your permission, except in connection with performing your background screen for FirstPoint's client or as otherwise described in this Privacy Policy.

FirstPoint may disclose personal information as necessary or appropriate in connection with any of the purposes for which we use personal information as described above in "How We Use Your Personal Information".

When FirstPoint conducts a background screening investigation about you, FirstPoint may disclose information to the FirstPoint client that ordered a background screening investigation on you. FirstPoint also may disclose your information to certain third parties as necessary to conduct the background investigation (such as educational institutions, prior employers, courts, law enforcement agencies and other persons or entities that may provide or verify information about you), as well as to a third-party representative or subcontractor

authorized by FirstPoint to assist in the background screening investigation. These third-party representatives and subcontractors include service providers that help host or support the website or otherwise provide technical assistance, court researchers and other data and service vendors. FirstPoint transfers to these representatives and subcontractors only the personal information they need to deliver to FirstPoint (for the benefit of FirstPoint's client) the requested product or service. FirstPoint prohibits these third parties from using that information for any other purpose. FirstPoint requires that these parties maintain commercially reasonable measures to protect the confidentiality of your information.

FirstPoint also may in good faith disclose personal information and any other additional information available to FirstPoint for any of the following purposes: (i) investigate, prevent or take action regarding actual or suspected illegal activities or fraud, situations involving potential threats to the physical safety of any person, or violations of FirstPoint's terms of use; (ii) respond to or defend against subpoenas, court orders, or other legal process; (iii) establish or exercise FirstPoint's legal rights; or (iv) otherwise comply with applicable law.

FirstPoint may acquire other businesses, and other businesses may acquire FirstPoint. If that occurs, the information FirstPoint collects may be one of the assets examined or transferred as part of the transaction. FirstPoint will not permit another business to examine the information FirstPoint has collected without a confidentiality agreement and only to the extent permitted by law. FirstPoint will not transfer the information it has collected unless the recipient agrees to provide privacy protections equal to or exceeding those established by this Privacy Policy.

### **Cookies and Tracking Technology**

FirstPoint's website may use the standard technology called a "cookie" to collect information about how you use the website.

A cookie is a small data file that is transferred to your hard drive and used for record-keeping purposes. A cookie file can contain information such as the URL you came from, your computer's IP address (i.e., the Internet address of your computer) and domain type

(e.g., .com or .org, etc.), your browser type, the country, state and telephone area code where your server is located, the pages of our site that were viewed during a visit, and any search terms that you entered on our site. This information is used for internal purposes only, and we do not link your URL or IP address to any personal information unless you have logged into our website with a FirstPoint account login and password. In addition, FirstPoint's website does not allow other parties to collect personally identifiable information about an individual consumer's online activities over time and across different Websites when a consumer uses the FirstPoint website.

If you would prefer not to receive cookies, you can alter the configuration of your browser to refuse cookies, although it is possible that some areas of our website will not function properly if you do so. In particular, you may be required to accept cookies in order to complete certain actions on FirstPoint's website. FirstPoint's website does not currently recognize "do not track" signals transmitted by web browsers.

In addition to cookies, FirstPoint uses various third-party technologies for the purpose of managing the website and protecting against fraud and misrepresentations. This can include the collection of your IP address, browser settings, and other technical information which is used to make sure you are properly adhering to the terms governing the website, or enabling us to validate your identity in the event you use a service via the website which requires your identity to be verified.

### **Personal Information Disclosure: United States or Overseas**

Personal information submitted to FirstPoint for background screening is not transferred to third parties outside of the United States or its territories unless the completion of a background report about the person requires gathering information about that person from outside the United States (for example, an international criminal check, verification of employment records outside the United States or verification of education records outside the United States.)

### **Security**

FirstPoint's commitment to system and data integrity and the protection of that data and privacy is not just the upholding of laws and regulations, but it is the very weave of the fabric that is our corporate culture. It was our cornerstone in 1906, and it continues to be our cornerstone as we begin our second century in business. Strict measures are used to store and maintain personally identifying information to protect it from loss, misuse, alteration or destruction by any unauthorized party while it is under our control. These measures include 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 of the information with which we are entrusted in accordance with applicable State and Federal laws such as FDCA and HIPAA regulations.

### **Links**

Our privacy policy only applies to [www.firstpointresources.com](http://www.firstpointresources.com) and the activities of the FirstPoint Background Screening Resources. If you click on a link on our site that takes you to a different organization or company's website, you need to read that site's privacy policy.

## Your Ability to Review or Modify Personal Information or Unsubscribe.

FirstPoint strives to protect the quality and integrity of your personal information. If you have provided your personal information (such as zip code, phone, e-mail or postal address) to FirstPoint while browsing FirstPoint's publicly accessible website, and wish to update such personal information (if any) that you have provided us, please e-mail us at [clientsupportteam@firstpointresources.com](mailto:clientsupportteam@firstpointresources.com). Also, if you wish to unsubscribe from any of our newsletters or other communications for which you have registered, you may e-mail us at [info@firstpointresources.com](mailto:info@firstpointresources.com). If you are a FirstPoint client with a registered account, you may review (and update) your account information by logging into your account. If you are an individual on whom a FirstPoint client has requested a background screening investigation, and have submitted personal information to FirstPoint at the request of such client for purposes of procuring a background report, then you can review your FirstPoint file in accordance with your file disclosure rights under the Fair Credit Reporting Act, California Civil Code Section 1786.22 and any other applicable state laws by contacting FirstPoint's Customer Department at [info@firstpointresources.com](mailto:info@firstpointresources.com). [Click to review a summary of your consumer rights \(including file disclosure rights\) under the Fair Credit Reporting Act.](#)

## Children Under Age 13

FirstPoint does not offer services to children under the age of 13, and this website is not directed to children under the age of 13. FirstPoint does not knowingly collect information about children under the age of 13.

## Changes to this Privacy Policy

FirstPoint Background Screening Resources may make changes to this policy on occasion. If there is a material change to this Privacy Policy, we will post the revised policy on our Website. We encourage you to periodically review this Privacy Policy.

## Contact Us

You may request at any time a free copy of your background report(s) (if any) prepared by FirstPoint and/or your active database files (if any) maintained on you by FirstPoint; and you may dispute for free the accuracy of the information in your background report. To make these requests, go to <https://firstpointresources.com/contact/>, email

[clientsupportteam@firstpointresources.com](mailto:clientsupportteam@firstpointresources.com) or contact us at 1-800-661-5644.

If you have any questions about this privacy statement, you can send a letter or an email to the address provided: FirstPoint Background Screening Resources PO Box 26140 Greensboro, NC 27402 or [info@firstpointresources.com](mailto:info@firstpointresources.com).

In accordance with California Civil Code § 1786.20, the representative named above will be able to assist you with additional information regarding our privacy practices and policies in the event of a compromise of your information.

*Effective Date: March 2021*