



Introduction

Verify, Inc. and its subsidiaries Vendor Surveillance Corporation, VTR Inc., and Logistech (collectively “Verify” or “we”) complies with the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. Verify, Inc. has certified that it adheres to the Privacy Shield Principles. If there is any conflict between the policies in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>

Scope

This Privacy Shield Policy applies to all Personally Identifiable Information (PII) collected by Verify subsidiaries; including Vendor Surveillance Corporation, VTR, Inc., Logistech, its contractors, customers, and other business partners located in the European Economic Area (the EEA) and Switzerland, which is then transferred to Verify in the United States. This includes, but is not limited to, transmission of data over phone lines, computer networks, and hard copy and includes such material as payroll or remittance records, telephone and contact records, business information, interviews and performance evaluations, contact details, results of permitted background and medical checks, resumes/CVs, bank accounts, and any material that identifies a particular individual employee, contractor, customer, or business partner in support of Verify service activities.

Responsibilities and Contact

In implementing this policy, Verify will annually certify to the US Department of Commerce that it agrees to adhere to the Privacy Shield principles. Verify further acknowledges that its failure to provide an annual self-certification to the US Department of Commerce will result in the removal of Verify from the list of participants.

Questions regarding the transmission of PII from the EEA or Switzerland to the United States or any other non-EEA country, or any further transmission of the PII once received in the United States, should be referred to Verify’s Quality, Compliance and Administration department, at:

- Phone: +1-949-335-9120
- Mail: Verify – Quality, Compliance and Administration
2525 Main St., Suite 100, Irvine, CA 92614, USA
- E-mail: compliance@vscnet.com

Policy

Verify’s Privacy Policy is based on the principles of notice, choice, onward transfer, access, security, data integrity and enforcement with respect to PII and other sensitive data transferred out of the EEA or Switzerland to the United States or any other location.



EU-US Privacy Shield / Swiss-US Privacy Shield

- **Notice.** Verify will notify employees, contractors, customers and other business partners in the EEA/Switzerland about type(s) and purpose(s) for which personal data will be collected and used. Information will be provided on how individuals can contact Verify with inquiries or complaints regarding personal data. Verify will notify employees, contractors, customers, and other business partners of any third parties to which it discloses PII, and restrictions that limit the use and disclosure of such information.
- **Choice.** Prior to using PII for any purpose incompatible with the purpose for which it was originally collected or subsequently authorized or transferred to a third party exercising independent control over the data, Verify will give an individual employee, contractor, customer or business partner the opportunity to decline to have their data so used or transferred. In the event that the PII used for a new purpose or transferred to the control of a third party are sensitive personal data, the individual's explicit consent will be obtained prior to the use or transfer of the PII.
- **Onward Transfer.** Prior to transferring PII to any third party (excluding other members of the Verify group of companies), Verify will apply the Notice and Choice principles described above and will ensure that the third party recipient also subscribes to Privacy Shield Principles. Verify will further enter into a written agreement with such third party requiring that the third party provide at least the same level of PII protection as is maintained by Verify.
In cases of onward transfer to third parties of data of EU or Swiss individuals received pursuant to the Privacy Shield, Verify, Inc. is potentially liable.
- **Access.** Verify acknowledges the individual's right to access their data to review, edit, correct, or delete it. Employees, contractors, customers and business partners covered under this Policy will have access to PII about them that Verify holds and will be able to correct, amend or delete information if it is inaccurate, excepting cases wherein the burden or expense of providing access would be disproportionate to the risks of the individual privacy in the case in question or the rights of persons other than the individual would be compromised or violated. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data, should direct their query to the contact information listed above.
- **Security.** Verify will take reasonable and appropriate administrative, technical and physical precautions to protect the confidentiality, integrity, and availability of PII, whether in electronic or tangible, hard copy form. Access to PII of EU/Swiss employees, contractors, customers and business partners will be limited to those users who require such access in the course of doing business.
- **Data Integrity.** Verify limits the collection, usage, and retention of information to that which is germane for the intended purposes for which it was collected, and takes reasonable steps to ensure that all PII is reliable, accurate, complete and current.
- **Enforcement.** To ensure compliance with these Privacy Shield principles, Verify will:
 - Commit to cooperate with the Data Protection Authorities (DPAs) of the EU/Switzerland in the investigation and resolution of complaints and will comply with any advice given by the DPAs;
 - Employ a procedure for verifying that the commitment the company has made to adhere to the Privacy Shield principles has been implemented;
 - Remedy issues arising out of any failure to comply with the principles;



- Conduct compliance audits of its relevant privacy and security practices to verify adherence to this Policy;
- Subject any employee determined to be in violation of this policy to disciplinary action, up to and including termination of employment

Dispute Resolution

The Verify Quality, Compliance and Administration department will be the internal organization and mechanism for ensuring compliance with the Privacy Shield principles and facilitating the internal compliance audits referenced above. Any questions or concerns regarding the use or disclosure of PII should be directed to the Quality, Compliance and Administration organization at the contact address, phone number, or website provided above. Verify will investigate and attempt to resolve complaints and disputes regarding use and disclosure of PII by reference to the principles contained in this Policy. For complaints that cannot be resolved between Verify and the complainant, Verify will participate in the following dispute resolution procedures:

- For disputes involving human resources/employment-related personal information received by Verify from individuals or citizens of EU countries or Switzerland, Verify has agreed to cooperate with the relevant Data Protection Authorities (DPAs) and to participate in the dispute resolution procedures of the panel established by the EU/Swiss DPAs.
- Verify, Inc. has further committed to refer unresolved consumer and non-human resources privacy complaints under the Privacy Shield Principles to BBB EU PRIVACY SHIELD, a non-profit alternative dispute resolution provider located in the United States and operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit www.bbb.org/EU-privacy-shield/for-eu-consumers/ for more information and to file a complaint.
- If your complaint is not satisfactorily addressed, and your inquiry or complaint involves human resource data transferred from Europe in the context of the employment relationship, you may have your complaint considered by an independent recourse mechanism: for EU/EEA Data Subjects, a panel established by the EU data protection authorities (“DPA Panel”), and for Swiss Data Subjects, the Swiss Federal Data Protection and Information Commissioner (“FDPIC”). To do so, you should contact the state or national data protection or labor authority in the jurisdiction where you work. CSC agrees to cooperate with the relevant national DPAs and to comply with the decisions of the DPA Panel and the FDPIC.
- Should your complaint remain fully or partially unresolved after a review by CSC, BBB EU Privacy Shield and the relevant DPA, you may be able to, under certain conditions, seek arbitration before the Privacy Shield Panel. For more information, please visit www.privacyshield.gov.
- Please note that if your complaint is not resolved through these channels, under limited circumstances, a binding arbitration option may be available to EU or Swiss individuals before a Privacy Shield Panel.
- Verify, Inc. is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).



Limitation of Application of Principles

Verify adheres to these privacy principles except (a) as required or allowed by law; (b) to meet legal, governmental, law enforcement or national security obligations; or (c) to protect the health and safety of an individual.

NOTE: Verify, Inc. may be required to disclose an individual's personal information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements.

Changes

This policy may be changed from time to time. When updates are made, the "Last Updated" date at the bottom of this document will be updated appropriately. This Policy will be posted on Verify's website and remain publically available at all times.

Last Updated: July 26, 2017