



# Privacy Policy

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## Introduction

The Verify Group of Companies (Vendor Surveillance Corporation (VSC), VTR Inc., Verify Europe Ltd., VTR (UK) Staffing Ltd. and Verify Asia)(collectively “Verify” or “we”) complies with the EU General Data Protection Regulation (GDPR) and the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework. Verify, Inc. adheres to the EU GDPR and Privacy Shield Principles. If there is any conflict between the policies in this privacy policy and the above named frameworks, the regulations/principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/> or for more information on the GDPR, please visit <https://www.eugdpr.org>.

## Scope

This Privacy Policy applies to all Personal data collected by the Verify Group of Companies, its contractors, customers, and other business partners. 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

As part of the implementation of 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 rights, use and transmission of Personal data should be referred to Verify’s Data Protection Officer (DPO) within the 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](mailto: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 personal data and other sensitive data.

- **Notice.** Verify will notify employees, contractors, customers and other business partners in the European Union (EU), 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,

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customers, and other business partners of any third parties to which it discloses personal data, and restrictions that limit the use and disclosure of such information.

- **Information We Collect and Use.** This shall include information about your computer including your IP address, geographical location, browser type and version. Furthermore, this would include any personal information including; name, date of birth, contact information (email, address, telephone numbers), CV or resume, DBA, Citizenship, for recruitment, contracting and employment opportunities. Any special categories requested, such as; ethnic origin, gender, health status is necessary for equal opportunity requirements and obligations.
- **Choice.** Prior to using personal data 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 access, rectify, remove, correct, object and restrict processing of their data so used or transferred by emailing us at [compliance@vscnet.com](mailto:compliance@vscnet.com). In the event that the personal data 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 personal data.
- **Onward Transfer.** Prior to transferring personal data 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 EU GDPR and 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 Persona Data 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 and GDPR, Verify is potentially liable. The personal and sensitive data for candidates will be kept in our recruitment applicant tracking system, iCIMS, Inc. platform. Information that we collect may be stored, processed in and transferred between any of the countries in which we operate for use in accordance with this policy.
- **Access.** Verify acknowledges the individual's right to access their data to review, rectify, or remove it. Employees, contractors, customers and business partners covered under this Policy will have access to personal data about them that Verify holds and will be able to correct, amend, delete or review 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, review 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 personal data, whether in electronic or tangible, hard copy form. Access to personal data 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 personal data is reliable, accurate, complete and current.

- **Notice Regarding Cookies.** Our Marketing department and analytics providers use cookies and similar tracking technologies to analyze data and validate the website movements from our visitors. We may receive information on an individual and on an aggregate basis. Blocking all cookies by updating your specific settings may have a negative effect on use and functionality.
- **Enforcement.** To ensure compliance with these GDPR and Privacy Shield principles, Verify will:
  - Establish reasonable technical and organizational precautions to prevent the misuse, loss or alteration of your personal information
  - 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 requirements and facilitating the internal compliance audits referenced above. Any questions or concerns regarding the use or disclosure of personal data should be directed to the Quality, Compliance and Administration and / or the Data Protection Officer (DPO) 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 personal data 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/](http://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



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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](http://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; (c) as required by contract terms or (d) to protect the health and safety of an individual.

Our site may contain links to and from the websites of partners that would have their own privacy policies and we do not accept any responsibility for security, privacy of information, liability or practices on any third party website. Prior to submitting any personal data to these sites, please review the established privacy policies.

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: [May 25, 2018](#)