

## Privacy Policy

Revised — MAY 2018

### Commitment to Privacy

Consumer Reporting Compliance Associates (“CRCA”) is concerned about the protection of personal information. It is CRCA's policy to maintain the confidentiality and privacy of personal data submitted to CRCA in writing or while visiting [www.crcascreening.com](http://www.crcascreening.com). This can include personal information of clients, vendors, business prospects, employees, job applicants and consumers.

### Client Information

CRCA gathers information about its visitors primarily to process your orders, but also to continue to provide superior and personalized customer service. By collecting the information, CRCA is able to make more accurate product recommendations and send email notices or reminders. CRCA is dedicated to providing the best possible browsing experience and gathering this information helps make that possible.

### Contractual Relationship Information

CRCA may use the personal information of business prospects, clients and vendors in order to establish, execute and terminate a contract. Business prospects can be contacted during the contract preparation process using the information that they have provided. Personal data can be processed to prepare bids or to fulfill other requests of the prospect that relate to contract conclusion. This includes notices and advisory services for the client under the contract if this is related to the contractual purpose. Personal information may be provided to financial institutions to process payments. To ensure that subject information is safeguarded, personal information may be used to complete due diligence checks to ensure that subject data is only provided to third parties that have been appropriately verified and credentialed.

### Advertising Information

CRCA does not sell mailing lists or exchange services in return for the use of personal information. Clients, vendors and business prospects may receive periodic mailings or emailings from CRCA with information on new services and changes in service. To opt-out, contact CRCA in writing or by email at the addresses listed below or you can opt-out on the email advertisements.

CRCA does not sell or advertise the personal information of job applicants, employees or data report subjects.

### Employee and Applicant Information

CRCA may collect information from employees and job applicants to perform its human resource functions. Individuals will be informed of the purposes for which CRCA collects and uses the personal information. CRCA will provide the Individual with the choice and means, if any, for limiting the use and disclosure of their personal information when required. Disclosures or notices will be provided in clear and conspicuous language when individuals are first asked to provide personal information to CRCA, or as soon as practicable thereafter, and in any event before CRCA uses or discloses the information for a purpose other than for which it was originally collected.

### Consumer Information

CRCA may disclose personal information on consumers to third parties in connection with the business transaction and purpose for which it was collected. Third party disclosure of the personal information may include the requesting client company, affiliate companies, third party agents, in-country sources, educational institutions, employers, courts, law enforcement agencies and other persons, businesses or government agencies as necessary for CRCA to complete a business transaction.

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

Personal information submitted to CRCA may, at times, be transferred outside of the United States ("U.S.").

## **Cross-Border Transfer of Personal Information & Legal Requirements**

Cross-border transfers may be made under a variety of legal mechanisms including contracts, consent and regulatory authority frameworks.

Personal information submitted to CRCA may be stored in the U.S., but also may be transferred to third parties in other countries. Third-party vendors may store personal information in other countries. Therefore, the personal information may be subject to U.S. or other laws for disclosure and may be accessible to foreign law enforcement, national security agencies or courts. Personal information may be disclosed in response to legal requirements.

## **Policy Changes**

This policy may be amended from time to time. Any changes that are made to the existing privacy policy of CRCA will be posted on this website.

## **Contact Information**

For additional information contact:

Curtis Williams  
Compliance Officer  
Owens OnLine LLC  
1748 W. Katella Avenue, Suite 114  
Orange, CA 92867  
Phone: +1 800-714-3919  
Email: [info@crcascreening.com](mailto:info@crcascreening.com)

In accordance with California Civil Code § 1786.20 the contact listed above will be able to assist you with additional information on CRCA's privacy practices and policies in the event of a compromise.

# European Union, European Economic Area and Switzerland Privacy Policy

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Consumer Reporting Compliance Associates (“CRCA”) follows the legal framework of EU approved standard contractual clauses with respect to personal information collected from individuals who reside in the European Union. CRCA complies with and adheres to the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation) with regard to the processing of personal data and on the free movement of the data. CRCA also complies with and adheres to the EU Commission Decision on standard contractual clauses for the transfer of personal data to processors established in third countries under the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation).

## Notice

CRCA collects and uses the personal information of clients, vendors, business prospects, employees, job applicants and consumers. The information obtained by CRCA will be used for the purpose for which it was collected or for legal requirements.

### Consumer Information

CRCA receives information on consumers from its clients, vendors or other entities (courts, law enforcement agencies, educational institutions, employers, etc.) within the EU or Switzerland in the performance of services for and under the direction of its clients. Where CRCA is the recipient of personal information, it will use the information in accordance with the purpose indicated with the notices provided by such entities and the consent choices made by the individuals to whom such personal information relates. CRCA’s client types include employers, financial institutions, insurance companies, other background screening agencies, etc. Most services are requested for the purposes of employment related decisions, credit granting and license applications. CRCA plays no part in making any decision related to how our clients use the consumer information CRCA provides in the performance of the services ordered.

### Client, Business Prospect & Vendor Information

CRCA collects and uses the personal information of clients to process orders. CRCA may use the personal information of business prospects, clients and vendors in order to establish, execute and terminate a contract. Business prospects can be contacted during the contract preparation process using the information that they have provided. Personal data can be processed to prepare bids or to fulfill other requests of the prospect that relate to contract conclusion. This includes notices and advisory services for the client under the contract if this is related to the contractual purpose. Personal information may be provided to financial institutions to process payments. To ensure that subject information is safeguarded, personal information may be used to complete due diligence checks to ensure that subject data is only provided to third parties that have been appropriately verified and credentialed.

### Employee and Job Applicant Information

CRCA may collect and use information from employees and job applicants to perform its human resource functions.

## Choice

CRCA affords individuals the opportunity to choose whether their personal information will be disclosed to a third party or will be used for a purpose incompatible with the purpose for which it was originally collected or subsequently authorized by the individual. Therefore, consumer data may be disseminated under these circumstances unless the consumer explicitly opts-out by withdrawing consent.

Where a consumer chooses to withdraw consent, processing will be stopped without undue delay. When a consent is withdrawn, information is not necessarily erased or deleted. The consumer shall have the right to request erasure. Various laws may require that the data be maintained on file for a specified period of time for consumer protection purposes.

## **Accountability for Onward Transfer**

CRCA discloses personal data that it collects to third parties in connection with the business transaction for which it was collected. Third party disclosure of the information may include the CRCA's client whom the consumer has authorized to receive such information and the third-party representative of CRCA authorized to receive such information (e.g. affiliate companies, agents, in-country sources, educational institutions, employers, courts, law enforcement agencies and other persons or entities that may provide or verify information as necessary for CRCA to process the authorized transaction). CRCA also may in good faith disclose personal information and any other additional information available to CRCA, for any of the following purposes: (i) to 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 CRCA's terms of use; (ii) to respond to subpoenas, court orders, or other legal process; (iii) to establish or exercise CRCA's legal rights; or (iv) otherwise to comply with applicable law. In cases of onward transfer to third parties of data of EU and Swiss individuals received pursuant to the EU-U.S. Privacy Shield and Swiss-U.S. Privacy Shield, CRCA is potentially liable.

CRCA takes reasonable steps to safeguard personal information by entering agreements with third parties to comply with the EU-U.S. Privacy Shield and the Swiss-U.S. Privacy Shield programs and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation) effective 25 May 2018.

## **Security**

CRCA is committed to protecting personal information. While CRCA cannot guarantee the security of the information, CRCA 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.

## **Data Integrity and Purpose Limitation**

In accordance with applicable law, CRCA takes reasonable steps to ensure that the information CRCA collects is accurate, complete, current and reliable for its intended use. CRCA only collects data that is necessary for the purposes listed under the section on "Notice."

CRCA takes reasonable and appropriate measures to retain personal data only for as long as CRCA has a legitimate legal or business need, such as compliance with legal or contractual retention obligations, retention for audit purposes, customer service, security and fraud prevention, preservation of legal rights or other reasonable purposes consistent with the purpose of the collection of the information. CRCA will adhere to the Principles for as long as CRCA retains personal data transferred in reliance upon the Privacy Shield.

CRCA makes every effort to ensure that the data it collects and stores is as accurate as possible. CRCA cannot guarantee, however, that third parties are accurate in their information. Therefore, CRCA denies any responsibility for the accuracy of the data supplied by any third-party sources of information or by CRCA's clients.

## **Access**

An individual may request, in writing, the personal information collected and maintained. In the case of consumers, this includes a copy of their consumer report.

CRCA affords the consumer a reasonable opportunity to correct, amend or delete information that is inaccurate or incomplete, except where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy or where the rights of persons other than the individual would be violated. Individuals who wish to exercise these rights may contact CRCA using the contact details listed below. For security purposes, CRCA will require verification of the consumer's identity.

## Recourse, Enforcement and Liability

CRCA is committed to answer questions and resolve complaints about your privacy and our collection or use of your personal information. EU, EEA and Swiss consumers with inquiries or complaints regarding this privacy policy or the processing of their personal information should first contact CRCA at:

Curtis Williams  
Compliance Officer  
Consumer Reporting Compliance Associates, LLC  
1748 W. Katella Avenue, Suite 114  
Orange, CA 92867  
Phone: +1 800-714-3919  
Email: [info@crcascreening.com](mailto:info@crcascreening.com)

Please note that if your complaint is not resolved through this method, under limited circumstances, where permitted by the Privacy Shield program, a binding arbitration option is available if the individual believes there has been a violation of Privacy Shield requirements that has not been appropriately addressed by CRCA.

CRCA's compliance with its Privacy Shield obligations is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC).

CRCA will verify adherence to the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation) with regard to the processing of personal data and on the free movement of the data via a set of EU approved standard contractual clauses.

CRCA has agreed to cooperate and comply with the European Data Protection Authorities or the Swiss Federal Data Protection and Information Commissioner, as applicable.

## Policy Changes

This policy may be amended from time to time. Any changes that are made to the existing policy of CRCA will be posted on this website.

## Cookie Policy

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Consumer Reporting Compliance Associates (“CRCA”) uses a standard technology called a cookie. A cookie is a small file that is sent to your computer by CRCA’s website. CRCA uses cookies to allow you to move quickly through the site. This is accomplished in many ways using several different cookies.

### How This Site Uses Cookies

This website uses the following cookies:

Cookie Type	Details
Strictly Necessary Cookies	These cookies enable services you have specifically requested. The cookies are stored in temporary memory only while a user is visiting the website and they are deleted from memory when the user closes the browser. These essential cookies usually contain information that identifies a session. Without the cookie, a session could not exist. The net result would be that a user would have to re-enter their username and password on every page.
Performance Cookies	These cookies collect anonymous information on the pages visited. CRCA collects certain aggregate details when you visit the website. The cookies used do not collect personal information. The cookies tell CRCA things such as how many users visited the site and the pages accessed. By collecting this information, CRCA learns how to best tailor the website to visitors.
Functional Cookies	These cookies remember choices you make to improve your experience. CRCA uses these cookies after the user has logged in. They allow the website to remember choices you make such as frequently selected countries.
Third Party Cookies	These cookies are used for payment processing and analytics.

CRCA uses the following third party analytic cookies:

Cookie Name	Purpose
	CRCA uses Google Analytics to give insights into how users interact with the website. To obtain these insights, Google Analytics uses a number of cookies. The information collected is anonymous and statistical.

**Google Analytics** uses the cookies "ga" and "\_gat" common website browsers. [Google Analytics Privacy Policy](#). Google provides an [opt-out plug-in](#) for most

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## **Data Security Policy**

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Consumer Reporting Compliance Associates (“CRCA”) realizes the importance of secure online transactions to protect information from any loss, misuse, disclosure, alteration or destruction. To help safeguard the information we obtain and process in our website, CRCA utilizes a combination of online and offline security technologies, procedures and processes.

### **Data Encryption**

CRCA's system utilizes industry standard encryption technology.

### **Data Retention**

CRCA's system will retain the data as long as the purpose for which it was collected remains or until it is no longer necessary for any other legal or business purposes. After its retention period expires, CRCA will destroy the data using industry standard tools or devices.

### **Physical and Logical Security**

CRCA's systems are located in a secure facility where physical access to the systems including its backup media is monitored and granted only to persons with a valid business need. The network is protected with multiple layers of security including firewalls. In addition to using SSL encryption, access to the services in the website requires strong password authentication.

Before the introduction of new methods of data processing, particularly new IT systems, technical and organizational measures to protect personal data shall be defined and implemented. This applies regardless of whether data is processed electronically or in paper form.

### **Security Vulnerability Management**

CRCA's systems and its underlying subsystems are hardened using industry best practices and standards. Critical security patches are implemented promptly.

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## **Legal Policy**

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By accessing and/or using the website, the user acknowledges this disclaimer and agrees to be bound by the further terms and conditions set out below.

Any information Consumer Reporting Compliance Associates (“CRCA”) may post in the pages of this website are purely informational and may not be construed as legal advice. This includes, but is not limited to, forms and posts discussing legal and legislative developments. CRCA advises that user consult experienced counsel to ensure compliant use of CRCA's content and reports in connection with its particular credit, due diligence or screening program.

## **No Warranties**

CRCA makes no warranties or representations as to the accuracy or timeliness of information on this website.

CRCA assumes no liability or responsibility for any errors or omissions in the content of the website. Information on this website may contain technical inaccuracies or typographical errors. CRCA may change or update information without notice. Further, CRCA makes no warranties or representations as to the accuracy or timeliness of any information on any third-party websites that are linked to this website.

## **Limitation of Liability**

UNDER NO CIRCUMSTANCES SHALL CRCA BE LIABLE FOR ANY DAMAGES SUFFERED BY ANY USER, INCLUDING ANY INCIDENTAL, SPECIAL, EXEMPLARY OR CONSEQUENTIAL DAMAGES (INCLUDING, WITHOUT LIMITATION, ANY LOST PROFITS OR DAMAGES FOR BUSINESS INTERRUPTION, LOSS OF INFORMATION, PROGRAMS OR OTHER DATA) THAT RESULT FROM ACCESS TO, USE OF, OR INABILITY TO USE THIS WEBSITE OR DUE TO ANY BREACH OF SECURITY ASSOCIATED WITH THE TRANSMISSION OF INFORMATION THROUGH THE INTERNET, EVEN IF CRCA WAS ADVISED OF THE POSSIBILITY OF SUCH DAMAGES.

## **Policy Changes**

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