



Privacy Statement

Strategic Information Resources, Inc., "SIR", is dedicated to protecting your privacy. As a provider of background screening, credit reporting, and mortgage reporting services, SIR is governed by the federal Fair Credit Reporting Act, the Gramm-Leach-Bliley Act and other relevant laws. In addition, we follow the standards of Safe Harbor certification.

This Privacy Statement covers SIR's website and our practices for handling sensitive consumer information provided by our visitors and clients, and by the applicants or employees for whom background checks are ordered. SIR will collect, store, and use all personal information in compliance with applicable laws, including the Fair Credit Reporting Act.

All SIR based websites are developed with the commitment to protect your online privacy while providing you with the most useful Web experience possible. While you may use many features of all SIR based websites anonymously, you are required to provide information to gain access to some of our client based content and services.

How we protect your personal information

SIR is dedicated to securing any Sensitive Consumer Information (SCI) you may share with us directly, or that may be provided by one of our clients. The definition of SCI is slightly different amongst federal and state laws but generally includes information containing an individual's first name and last name or first initial and last name in combination with any 1 or more of the following data elements that relate to such consumer:

1. full social security number; or
2. driver's license number or state-issued identification card number; or
3. financial account number, or credit or debit card number, with or without any required security code, access code, personal identification number or password, that would permit access to a consumer's financial account.

SIR utilizes reasonable procedures to protect your SCI from unauthorized access, misuse, alteration or disclosure by unauthorized parties. This includes:

- Encrypting any SCI you enter on any SIR based sites with secure server software (SSL) that encodes the information before your Web browser software sends it to us. The SSL software decodes the data only after it reaches our server, preventing hackers from intercepting any of your personal information while it is in transit
- Protecting and storing SCI inside locked file cabinets within a secure facility
- Permanently destroying SCI when the information is no longer needed

What we provide to third parties

While no SIR based site provides any third-party, other than an explicit provider of SIR based services, access to your personal information, we may provide third parties with aggregate statistics about our customers, traffic patterns, and related site information. This data reflects site usage patterns gathered during customer visits to our Web site each month, but it does not contain behavioral or identifying information about any individual member.

To conduct regular business, we may collect nonpublic personal information from sources such as:

- Information provided by you on applications or other forms you provide to us
- Information about your transactions with us, our affiliates or others
- Information we may receive from other sources

The following describes specific interaction with SIR web sites and how the information collected is used and stored:

1. SIR uses client IP addresses to diagnose problems with its server, and to administer its web site. IP addresses are kept solely in web-server log files and are not used to identify individual clients. It is not linked to client accounts or any other demographic information.
2. SIR uses cookies to track the position of its clients within its site. This cookie is a session cookie, and it is discarded when your browser is exited.
3. SIR web sites neither request nor display client account information. SIR uses account information in the following ways:
 - SIR uses client contact information to send information and to market new and additional services.
 - Contact information is also used to contact the client when necessary.
 - SIR collects financial information for billing purposes and may use that information for the collection of past-due accounts or for marketing purposes.
 - This site contains links to other sites. SIR is not responsible for the privacy practices or the content of such other web sites.

Obtaining your consent

By using our Web site, you give SIR permission to collect information about the pages served to you as an anonymous user for the purpose of calculating aggregate site statistics. As a customer, you give SIR and our agents permission to send you e-mails related to the products or services you receive from SIR, or related products that we may offer. Any changes to our privacy policy will be posted on this page so that you are always aware of what information we collect, how we use it, and under what circumstances we disclose it.

For applicants or employees for whom background checks are ordered by one of our clients: By authorizing SIR's client to process a background screening investigation, or by providing your personal information to SIR, you are authorizing us to share this information with SIR's subcontractors in accordance with this Privacy Statement, for the purposes of enabling SIR to compile a background screening report on you. Personal information that may be gathered about you in connection with a background screening investigation may include your driver's license number, social security number, date of birth, address history, criminal record, work history, educational record, and other pertinent information.

When applicable, SIR's subcontractors will receive only the personal information they need to deliver the requested product or service, they will be prohibited from using that information for any other purpose, and they will be required to maintain commercially reasonable security measures to protect the confidentiality and security of that information.

Personal Information Disclosure: United States or Overseas

SIR processes all background checks in the United States and does not send any personal information to be processed overseas by employees or third parties, unless;

- 1) a specific request has been made to search foreign criminal courts because an applicant has lived overseas, or
- 2) to verify work or education history at a foreign employer or foreign educational institution because an applicant has worked or attended school overseas.

Safe Harbor

SIR complies with the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. SIR has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view SIR's certification, please visit <http://www.export.gov/safeharbor/>

For questions about our security policy, please contact Maureen Devine, Senior Vice President of SIR, at 800-332-9479.

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