



# Privacy Policy

## ***Privacy Statement***

*Employment Screening Services, Inc. (ESS) respects the privacy interests of all clients, consumers, and visitors to our web sites. We are committed to protecting any information provided to ESS. Be assured that we take extreme caution in protecting the privacy of this information. Additionally, ESS is committed to safeguarding and securing our methods of data transmission.*

*We understand that consumers may be concerned about what we do with personal or financial information. We agree that consumers have a right to know how we will utilize such information. Therefore, we have adopted this Privacy Policy to govern the use and handling of personal information.*

## **The Employment Screening Services Principles of Privacy Consumer Confidentiality and Security**

Personal information is processed only with the consumer's knowledge and authorization. Only information that is actually needed is collected and processed. Personal information is protected from unauthorized or accidental disclosure and is only seen by those persons who need it to perform their job to provide the products and services authorized by you. Personal information is retained only as long as is required by law.

Our employees are comprehensively screened and trained to ensure that information is handled responsibly and in accordance with the Privacy Policy. We maintain strict physical, electronic, and procedural safeguards that comply with state and federal regulations to guard a consumer's nonpublic and public personal information.

**Under penalty of law and in accordance with the Fair Credit Reporting Act (FCRA 15 U.S.C. § 1681r), Employment Screening Services does not share, disclose, or sell any information to unauthorized parties.**

## **Consumer Right of Access to Personal Information**

Employment Screening Services, Inc. is a consumer reporting agency and falls under the regulations set forth in the Fair Credit Reporting Act (FCRA) as imposed by the Federal Trade Commission. Consumers have the right to see any information on them held by Employment Screening Services, Inc. Additionally, ESS has a dispute resolution department that quickly handles all inquiries and complaints regarding information provided to our clients.

## **To Our Web Site Visitors**

When you visit the Employment Screening Services, Inc. web site, we collect general data including your domain name, the name of the web page from which you entered our site, which pages you visit on our site, and how much time you spend on each page. This general information does not include specific identifying information about you. We use this information to monitor and improve our site, and we do not provide this information to outside parties.

## **Safe Harbor Provisions of Privacy Policy**

Employment Screening Services, Inc. complies with the U.S.-EU 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. Employment Screening Services, Inc. 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 our certification page, please visit <http://www.export.gov/safeharbor/>

### **1. Notice**

ESS collects information on individuals for the purpose of providing the information to employers for employment related decisions (hire, retain, promote, or reassign). Information may also be utilized to conduct employee investigations where an employer has a suspicion of work related misconduct or wrongdoing. Human resources and security professionals with the employer organizations will utilize the information. Prior to receiving information from ESS, each employer must provide a certification (as prescribed the Fair Credit Reporting Act) to ESS that it will only use ESS for employment purposes and that it will comply with all state and federal regulations and obligations. Furthermore, before any employer's agent or employee receives the information in order to complete his/her job, he/she must provide an individual certification to the same effect.

### **2. Choice (opt-out of sensitive information)**

ESS gives consumers a choice for the collection of information by virtue of the fact that the information is only collected with the consumer's explicit consent. Furthermore, the information collected is only utilized for the purposes described above in the section on "Notice." In the event a consumer wishes to opt-out of any information collected by ESS, a consumer can withdrawal his/her consent by notifying ESS through the contact link on this web site or through contact information provided on the consent form. This does not mean that information will be erased or deleted. Various laws required that ESS maintain the data on file for a period of time. However, in the event of an opt-out, the data will not be forwarded or utilized by ESS for any purpose.

### **3. Onward Transfer**

The information obtained by ESS is forwarded only to an entity that has been specifically authorized by the consumer to receive the data, or an agent of the end-user operating on behalf of the end-user, and only for the purpose described in the section under "Notice." ESS takes reasonable steps to insure that any party that receives information will maintain privacy and confidentiality (see "individual certification" as also described in the section under "Notice.") Any third party that receives information from ESS has received written authorization from the consumer, and has given the consumer prior notice as to the purpose of the collection of data. Each transfer of information to the third party includes a notification reiterating the privacy and confidential certifications made by the third party.

### **4. Access**

ESS provides access to consumers on all data collected about the consumer in order to allow the consumer the reasonable opportunity to ascertain what personal data ESS possesses about the consumer, and to correct, amend, or delete information that is inaccurate or incomplete. Disclosure is provided under the terms of the Fair Credit Reporting Act. Under all circumstances, a consumer is entitled to a copy of his/her report, including a consumer who is a citizen of the EU. However, ESS reserves the right to engage in reasonable efforts to confirm the identity of anyone requesting this data.

## 5. Security

ESS takes all reasonable procedures to protect personal and identifiable information from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. ESS utilizes a 128-bit encryption on a secured server for all Internet communications. Furthermore, only ESS employees who need the information to perform a specific job are granted access to personally identifiable information. Strong password protection protocols are used on all computers. All employees are kept up-to-date on our security and privacy policies. Finally, the servers that are used to store personally identifiable information are kept in a secure environment, with appropriate security measures. ESS has received “Site Secure Certification” through the TrueSecure Corporation. Full documentation of ESS security systems is available upon request.

## 6. Data Integrity

ESS only collects data that is strictly necessary for the purposes listed under the section on “Notice.” The data includes information that is necessary to identify the consumer for purposes of collecting employment related information. ESS makes every reasonable effort to assure maximum possible accuracy in the information collected. Regarding public record information that is likely to have an adverse effect on the consumer, ESS maintains strict procedures to insure the information is complete and up to date (per FCRA rules 613 (a)(1)(2)). ESS cannot be responsible for errors within court records and within the records of other consumer reporting agencies, such as credit bureaus. Therefore, ESS cannot act as a guarantor of information.

## 7. Enforcement

ESS adheres to the BBB EU Safe Harbor Program by means of in-house verification by the management of this company. In addition, we provide a readily available and affordable independent recourse mechanism by which each individual’s complaints and disputes are investigated and resolved by reference to the Principles and damages awarded where applicable law or private sector initiatives so provide. ESS is a member of BBB EU Safe Harbor Program. By participating in the Council of Better Business Bureau’s BBB EU Safe Harbor Program we have made a commitment to meet the program’s strict requirements regarding how we treat consumer information. This program is available at:

Council of Better Business Bureaus, Inc.  
BBB EU SAFE HARBOR  
4200 Wilson Boulevard, Suite 800  
Arlington, VA 22203  
Phone: 703-276-0100  
Web: [www.bbb.org/us/safe-harbor-complaints](http://www.bbb.org/us/safe-harbor-complaints)

Furthermore, ESS is governed by FCRA regulations as enforced by the U.S. Federal Trade Commission. As a Washington State corporation and a licensed private investigative agency, we are also governed by the rules and regulations of the State. ESS is a founding member of the National Association of Professional Background Screeners and strictly adheres to its professional standards, code of conduct, ethical business practices, and its promotion of compliance with the Fair Credit Reporting Act.

**Any questions regarding this Privacy Policy may be directed to:**

**The Chief Privacy Officer  
Employment Screening Services, Inc.  
627 E. Sprague  
First Floor**

**Spokane, WA 99202**  
**1-509-624-3851**  
[ess@employscreen.com](mailto:ess@employscreen.com)