

CONSUMER INFORMATION PRIVACY POLICY

Effective: May 17, 2018

Introduction

Foley Carrier Services, LLC (“Foley”) is a consumer reporting agency. It is required by the Fair Credit Reporting Act, 15 U.S.C. §1681 et seq. (“FCRA”) to maintain the confidentiality of all consumer information. Foley has created this privacy policy in order to describe how we collect, use, maintain, share and protect your personal information in connection with our screening services.

Protecting consumer information is important to Foley. Foley (hereinafter collectively referred to as “we,” “us” or “our”) adheres to the FCRA and Drivers Privacy Protection Act (DPPA). When and where applicable, we also adhere to state laws related to consumer reports, consumer reporting agencies, credit reports, driver information and other personal information.

This Consumer Information Privacy Policy outlines our general policy and practices for protecting consumer information, including the collection and intended use of information, the sharing of information, and how the information is stored and destroyed. This policy applies to all consumer information received by Foley whether in electronic, paper or verbal format.

Purpose of Collection and Intended Use of Consumer Information

Foley collects consumer information in furtherance of generating a Consumer Report and/or an Investigative Consumer Report. Information is collected for the purpose of conducting a background check for employment-related purposes, or for another purpose as authorized by the consumer. A consumer is informed of the particular purpose for which Foley and/or our Client (the “end user” of a Consumer Report) collects and intends to use the information at the time the consumer receives a Background Check Disclosure and completes an Acknowledgement and Authorization Form.

Individuals who wish to limit the use of their Personal Information, or who do not wish to be the subject of a Consumer Report and/or an Investigative Consumer Report, should not provide their Personal Information to Foley and/or our Client, and should not complete the Background Check Acknowledgement and Authorization Form.

Sharing of Consumer Information

Foley does not sell or disclose consumer information to third parties for a purpose other than for which it was originally collected, except as stated within this policy. We limit the dissemination of consumer information to those with a legitimate business need and permissible purpose, or as otherwise authorized by the consumer. Consumers are hereby notified that their personal information may be disclosed to a third party in conjunction with an authorized background check. Consumers who wish to opt out from the sharing

of their information should not provide their information to Foley and/or our Client, and should not complete the Background Check Acknowledgement and Authorization Form.

We may disclose consumer information: i) to our corporate affiliates or service providers as necessary or appropriate to provide the product or service requested by our Client; ii) to the extent necessary or appropriate to government agencies, advisors, and other third parties in order to comply with applicable laws or regulations, or if such action is necessary to protect the rights, property or legal claims of Foley, its affiliated companies, clients, individuals or the public; iii) in the event of an actual or contemplated transaction by which Foley or our assets are acquired by another company.

Information Storage and Disposal

Foley does not maintain a database of consumer information. Foley retains consumer information in a confidential manner. We take reasonable steps, including physical, electronic and operational measures, to protect the information from loss, misuse, unauthorized access, disclosure, alteration and/or destruction.

Part of our commitment to protecting consumer information is the proper disposal of the information to render it inaccessible, unreadable and/or unrecoverable. In compliance with current Federal Trade Commission guidelines, this may include (1) burning, pulverizing or shredding paper documents, (2) destroying or erasing electronic files and (3) utilizing the services of a reputable document destruction company.

Personal Information Disclosure: United States or Overseas

Foley does not transfer personal information to third parties outside the United States or its territories, except in cases where such transfer is necessary to fulfill services including but not limited to criminal record or credit checks, social media, sanction, or illicit activity searches and/or employment, education, reference or professional license verifications of information located outside of the United States or its territories. In such cases, only the minimal amount of information that is needed by the third party to complete that component of the background check is transmitted. When applicable, personal data is transmitted to third parties in compliance with the data protection laws in the originating country. Where the Personal Data originates in the EU, transfers can only occur either to a country with adequate data protection laws or pursuant to Privacy Shield, the EU Standard Contractual Clauses, or Binding Corporate Rules.

EU-US Privacy Shield Framework

As an affiliate of Good Egg LLC, Foley ("We") participate in the EU-US Privacy Shield Framework regarding the collection, use, and retention of personal information from European Union member countries. Foley has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. Foley also adheres to the Privacy Shield Principles and is covered under Good Egg LLC's self-certification. To learn more about the Privacy Shield Principles, visit [here](#).

We comply with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. The Federal Trade Commission has jurisdiction over our compliance with the Privacy Shield. If there is any conflict between the terms 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, please visit <https://www.privacyshield.gov/>.

In compliance with the Privacy Shield Principles, we commit to resolve complaints about our collection or use of your personal information. European Union individuals with inquiries or complaints regarding our Privacy Shield policy should first contact us at: privacy@goodegg.io or privacy@foleyservices.com. We will respond to your inquiry promptly. We have further committed to cooperate with the EU Data Protection Authorities (EU DPAs) who shall serve as an independent recourse mechanism (IRM) for resolution of unresolved Privacy Shield complaints. If you do not receive timely acknowledgment of your complaint from us, or if we have not resolved your complaint, please contact or visit your [local DPA](#) for more information or to file a complaint. The services of EU DPAs are provided at no cost to you. We will comply with the advice given by EU DPAs with regard to all data transferred from the EU. If neither we nor an EU DPA resolves your complaint, you may pursue binding arbitration through the Privacy Shield Panel. To learn more about the Privacy Shield Panel, visit [here](#).

As explained in this privacy policy, we sometimes provide personal information to third parties to perform services on our behalf. If we transfer personal information received under the Privacy Shield to a third party, the third party's access, use, and disclosure of the personal data must also be in compliance with our Privacy Shield obligations, and we will remain liable under the Privacy Shield for any failure to do so by the third party unless we prove we are not responsible for the event giving rise to the damage.

You can review our Privacy Shield registration [here](#). We are subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC). We may be required to disclose personal information that we handle under the Privacy Shield in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Accessing Your Personal Data

You are entitled to find out what personal information we have on file with proper identification, as follows:

- In person, by visual inspection of your file during normal business hours and on reasonable notice. You also may request a copy of the information in person. We will not charge you more than the actual copying costs for providing you with a copy of your file.
- A summary of all information contained in our file on you that is required to be provided by applicable law will be provided to you via telephone, if you have made a written request, with proper identification, for telephone disclosure, and the toll charge, if any, for the telephone call is prepaid by or charged directly to you.
- By requesting a copy be sent to a specified addressee by certified mail. In complying with requests for certified mailings, we shall not be liable for disclosures to third parties caused by mishandling of mail after such mailings leave our premises.

“Proper Identification” includes documents such as a valid driver’s license, social security account number, military identification card, and credit cards. Only if you cannot identify yourself with such information may we require additional information concerning your employment and personal or family history in order to verify your identity.

This information will be provided to you for the limited purpose of viewing, and in certain cases, updating the information if you inform us that personal information we have on file is incorrect. If you are disputing the accuracy of information that was provided to us by a third-party information provider, we will promptly investigate and update the information, if necessary. Unverifiable information will be removed from your file.

The Choices You Have

As discussed above, you can always choose not to provide information, even though it might be needed to initiate a background check in order for you to be considered for employment by your prospective employer.

Your information will only be used for permissible purposes in furtherance of completing an authorized background check. If you who wish to opt out from the sharing of your information with third parties in conjunction with an authorized background check, you should not complete the Background Check Acknowledgement and Authorization Form.

You can add or update certain information referenced in the “Accessing Your Personal Data” Section directly above. When you update information, we usually keep a copy of the prior version for our records.

If you do not want to receive e-mail notifications from us, please do not complete the Agree to Receive Notifications Electronically Form. If you do not want to receive legal notices from us, such as this Privacy Policy, such notices will still govern your use of our authorized services and it is your responsibility to review them for changes.

Privacy Notice for California Residents

Preparation and Processing of Investigative Consumer Reports

Under California law, an “investigative consumer report” means a consumer report in which information on a consumer’s character, general reputation, personal characteristics, or mode of living is obtained through any means. The term does not include a consumer report or other compilation of information that is limited to specific factual information relating to a consumer’s credit record or manner of obtaining credit obtained directly from a creditor of the consumer or from a consumer reporting agency when that information was obtained directly from a potential or existing creditor of the consumer or from the consumer.

When preparing investigative consumer reports, Foley utilizes procedures and policies designed to comply with the Fair Credit Reporting Act (15 U.S.C. § 1681 et seq., as amended) and the California Investigative Consumer Reporting Agencies Act (Cal. Civ. Code § 1786 et seq.). Foley maintains a comprehensive written information security program which includes administrative, physical and technical safeguards that are designed to reasonably and appropriately protect the confidentiality, integrity and availability of confidential information.

Personal Information Disclosure: United States or Overseas - In connection with its preparation and processing of investigative consumer reports, Foley may transfer personal information about you to our employees, data sources, authorized service providers or affiliates outside the United States and its territories.

Contact Information

To obtain additional information about Foley's privacy policy or practices related to preparing and processing consumer reports and/or investigative consumer reports, or in the event of a compromise of your information, please contact:

Foley

Attn: Compliance Manager

105 Maxess Road, Suite 202B

Melville, NY 11747

Email: privacy@foleyservices.com

Phone: (631) 557-0112