Privacy and Cookies Policy ACCESS19

This policy was last updated on June 5, 2020

Who can I contact with questions regarding this Policy?

EU-US/ Swiss-US Privacy Shield Framework

CARCO Group Inc., dba Cisive ("Cisive", "we" or "our") and its affiliates including but not limited to CARCO Driver IQ, LLC, eVerifile.com, Inc., IntelliCorp Records, Inc. and PreCheck, Inc. is committed to protecting any personal information that we collect, use, share or maintain about you. This Privacy Policy (this "Policy") applies to the collection of information by the ACCESS19 website or mobile application, and any other websites or mobile applications that link to or otherwise adopt this Policy.

This privacy policy is divided into sections for the convenience of the reader. If you would like to jump to a particular section, follow the links below:

What types of information are collected through this site or mobile application? What choices do I have about how is my information used? \Box What choices do I have about online tracking and the placement of cookies on my device? What types of choices do I have about your collection and use of personal information that I provide to you through your website or mobile application? Can I access and request correction of personal information I provide through the website or mobile application? How may personal information collected through this website or mobile application be disclosed to third-parties and to what types of third-parties? Do you take steps to safeguard information I provide through the website or mobile application? Does your website or mobile application contain links to other websites or social media platforms? П If I am using the website or mobile application from outside the United States will information П collected through the website or mobile application be transferred to the United States? How will changes to this Policy becommunicated?

What types of information are collected through this mobile application?

We may collect a range of information from your use of the website or mobile application depending upon the features you use.

We may collect personal information, such as your name, address, telephone number or cell or mobile number, email address, or other identifiers about you or, your health status and symptoms information or other information that you may provide in the course of completing a form or transaction on the website or mobile application.

We may collect information about the device that you are using to access our website or mobile application (such as the type of device you are using and the device identification number). Device information may or may not be personally identifiable depending upon whether it is linked to the identity of the user.

We may automatically log information, such as a user's IP address, date and time of access, and other log file data. This information may be used to analyze trends or to administer and protect our mobile applications. We may collect statistical or non-personally-identifiable information about our users. We also may collect aggregate information such as the total number of unique users of the website or application. We may use this information to measure the use of our and applications and to improve our content.

How is my information used?

We may use the information we collect through ACCESS19 for the following purposes:

- 1. To communicate with our customers, including responding to requests for information or to facilitate transactions or communications that users of our website or mobile applications request;
- 2. To maintain our customer accounts, for billing purposes, and for other purposes permitted by our customer agreements, if any;
- 3. To improve and administer our mobile applications;
- 4. To better understand the needs of the users of our website or mobile applications and create content that is relevant to the user;
- 5. For marketing and market research purposes (this does not apply to personally identifiable information submitted through our sites to request a report about another individual);
- 6. To conduct research, generate statistics and de-identified data;
- 7. To personalize content for the user;
- 8. To notify the user of any changes with our mobile application which may affect the user;
- 9. To enforce the terms of use for our mobile application;
- 10. To prevent fraud and investigate potential misconduct;
- 11. To comply with law and legal process.
- 12. To perform the services requested by either you, or your employer, or our clients.

What choices do I have about online tracking and the placement of cookies on my device?

Some Internet browsers have begun to offer what often is referred to as "do not track" mechanisms for browser users to automatically signal privacy preferences to websites that they visit. Our site(s) do not currently respond to do-not-track-signals. We may revisit the issue in the future. In the meantime, you can exercise other choices available to you, including limiting the placement of browser cookies on your device using your browser's cookie control features and other choices described in this Policy. Information about browser cookie controls for some common browsers include:

Internet Explorer Safari
Safari Mobile (iPhones and iPads)
Firefox
Chrome

What types of choices do I have about your collection and use of personal information that I provide to you through your website or mobile application?

You have a number of choices regarding our collection and use of information through our websites and mobile devices:

- ☐ In cases where you are requested to affirmatively provide information, such as to complete a form, or an application, or a survey on the Application, you may decline to do so. Please understand, however, that in some cases certain information is required to complete an application, form or survey, and if you decline to provide the information requested you may not be able to submit the application or request or to use certain functionalities of the website or mobile application.
- ☐ If you prefer that we no longer contact you, please e-mail us at <u>disputes@cisive.com</u>.
- ☐ If you would prefer not to receive e-mail marketing messages from us, please use the opt-out instructions included in the email message to opt-out of additional communications.
- □ You may be given additional choices in the context of particular preferences tools or functions that we make available through our website or mobile applications.

Can I access and request correction of personal information I provide through the website or mobile application? How do I access or request correction of information Cisive may maintain about me?

Yes. You can access personal information that you submitted to us through the website or mobile application either by using mechanisms available through the website or application or contacting us. We require that an individual provide reasonable validation of his or her identity before we provide access to personal information we maintain. Exceptions to access and correction rights may include:

- Where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy in the case inquestion;
- Where the rights of persons other than the individual would be violated; or
- With respect to individual requests for the correction or deletion of information, in cases where we are otherwise contractually or legally required to retain the personal information.

To request access to or correction of information please contact us at: (855) 881-0716 or by e-mail: disputes@cisive.com

How may personal information collected through this website or mobile application be disclosed to third parties and to what types of third parties?

We may disclose information with your consent or as otherwise necessary or appropriate to process
a transaction that you or our clients may request. For example, if you submit information, we will
use that information for the purposes of performing the services of ACCESS19. We may use contact
information provided by you such as your cell phone number or email to send updates or
notifications regarding your use of the services.

- 2. We may disclose, as necessary, information that we collect through our website or mobile applications with employees, agents, affiliated businesses, and service providers providing services on our behalf. In the event that our company or some of our assets are sold or transferred or used as security or to the extent we engage in business negotiations with our business partners, the information collected on our websites or mobile applications, including this site, may be transferred or shared with third parties as part of that transaction or negotiation.
- 3. If we receive a request from law enforcement officials or judicial authorities to provide information on individuals, we may provide such information. In matters involving claims of personal or public safety or in litigation where the data is pertinent, we may use or disclose your personal information without a court order.
- 4. We may use information you submit to investigate security breaches, misconduct, or otherwise cooperate with authorities pursuant to a legal matter.

Do you take steps to safeguard information I provide through the website or mobile application?

Cisive takes reasonable precautions to protect personal information from loss, misuse, and unauthorized access, disclosure, alternation, and destruction.

If you use this website or mobile application, you are responsible for maintaining the confidentiality of any user ID and password or other access credentials that you may be provided. You should notify us immediately if any user ID and password or other access credentials we may issue you are compromised.

Does your site contain links to other websites or social media platforms?

Yes, our website or application may include links to other websites or links that facilitate your ability to post content to social media platforms. This Policy only applies to those of our websites or mobile applications that link to this Policy. Please be aware that sites we link to may collect information about you and operate according to their own privacy practices which may differ from this Policy. Similarly, if you post content to social media platforms, such as Facebook or Twitter, please remember that your social media postings will be made available in accordance with the social media site where you are posting the information and that you may be limited in your ability to control information once you have made it available to third parties by posting it. Remember to consult the privacy policy of any websites you may visit regarding their privacy practices.

If I am using the site from outside the United States will information collected through the site be transferred to the United States?

This site or mobile application is designed primarily for users from the United States. By using this site, users from other countries consent to the transfer of any personal or other information collected to the United States and housed on servers in the United States and your information will be subject to use and disclosure in accordance with this Policy and applicable United States federal, state, and local law.

We participate in EU- US Privacy Shield program administered by the U.S. Department of Commerce. Information we may collect through this site from individuals submitting personal information from countries that participate in the Privacy Shield program also is subject to our Privacy Shield Privacy Statement which is available at http://www.cisive.com/eu-privacy-policy.php.

How will changes to this Policy be communicated?

If we make any material changes to this privacy policy we will change the "lasted updated" date so that you can quickly determine whether there were material changes since the last time you reviewed the policy.

Who can I contact with questions regarding this Policy?

If you have questions concerning our privacy practices, contact us at: disputes@cisive.com