

# Privacy and Cookies Policy SAFE19

This policy was last updated on June 8, 2020

CARCO Group Inc., dba Cive ("Cive", "we" or "our") is committed to protecting any personal information that we collect, use, share or maintain about you. This Privacy Policy (this "Policy") applies to the online collection of information by our websites, including Cive.com, Driver IQ.com, Intellicorp Records, Inc., and PreCheck.com and any mobile applications (App or Apps) 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:

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## **What types of information are collected through this site or mobile application?**

We may collect a range of information from you if you visit our site or mobile application depending upon the features you use.

We may collect personal information, such as your name, address, telephone number, email address, Social Security number or other identifiers or other information about you, including certain health information, in order to perform the services requested. If you are using our site to order reports about third parties, information about the individual(s) about whom you are requesting a report or other information that you may provide in the course of completing a form or transaction on our site or mobile application.

We may collect information about the browser and/or device that you are using to access our website or mobile application (such as the type of browser or device you are using, browser settings, 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, domain name, browser type, date and time of access, and other log file data. This information may be used to analyze trends or to administer and protect our websites and mobile applications. We may collect statistical or non-personally-identifiable information about our users, such as which pages are visited, how long a visitor stays on a particular page, the website from which a user came to our site, or similar such information. We also may collect aggregate information such as the total number of unique or return visitors to our site, using our application, or visiting a particular page in a given timeframe. We may use this information to measure the use of our sites and applications and to improve our content. We may use Google Analytics, a third party provider of analytics tools or a similar third party service to analyze information about visits to our website. For information about opting out of Google Analytics please visit: <https://tools.google.com/dlpage/gaoptout>.

## **Does your website use cookies or similar technologies?**

Yes, we may utilize "cookies," web beacons and other similar technologies on our website. We may use first and/or third party "browser" or "HTTP" cookies, which are unique text files that may be used for data analysis, and enable our website to tailor information for the visitor. We may use browser cookies for purposes such as to personalize the user's experience on our site, to remember a user when the user registers for products or services, for fraud prevention, or to track visits to our websites. We also may use "web beacons" (also referred to as pixel tags, clear gifs or other terms) or similar technologies to collect information such as how long a visitor remains on a particular page. If you do not want us to deploy browser cookies to your device when you visit our websites, you may set the browser to reject cookies or to notify the user when a web site tries to place cookies in the browser program (see below). Rejecting cookies may affect your ability to use some of features offered by the website. If you use our website without setting your browser to block cookies, you consent to the placement of cookies on your device.

Third parties, including our service providers may collect information about a visitor to our site over time and/or across different websites when the visitor uses our website. This information often is aggregate data or individual information that is tied to a browser or device rather than specific identifiers such as the visitor's name and address, but some of this information might be considered to be personally identifiable under some federal or state laws.

## **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](#)

### **How is my information used?**

We may use the information we collect through our site or Apps 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 sites or users of our 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 websites and mobile applications;
4. To better understand the needs of the users of our sites and 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 website or mobile application which may affect the user;
9. To enforce the terms of use for our website or mobile application;
10. To prevent fraud and investigate potential misconduct;
11. If you submit a resume to us seeking a position with Cisive or one of its subsidiaries we may use that information in the course of considering you for a position; or
12. To comply with law and legal process.
13. To perform the services requested by either you or your employer or our clients.

### **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 applications:

- In cases where you are requested to affirmatively provide information, such as to complete a form, or an application, or a survey on our website, 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 our websites or mobile applications.
- If you would like restrict our placement of cookies on your device, please see the FAQ "What Choices Do I Have About the Placement of Cookies on My Device?" above.
- If you prefer that we no longer contact you, please e-mail us at [disputes@cisive.com](mailto:disputes@cisive.com)
- 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 consumer report information Cisive may maintain about me?**

Yes. You can access personal information that you submitted to us through our sites either by using mechanisms available through the site 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 in question;
- 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 legally required to retain the personal information.

To request access to or correction of information please contact us at: (877) 511-7888 or by e-mail: [disputes@cisive.com](mailto:disputes@cisive.com)

The access and correction provisions of this online privacy policy only apply to personal information collected from you through this site or mobile application. Individuals that are interested in information about how to access and/or request the correction of personal information Cisive may maintain about them in our consumer reporting files can contact us at: (877) 511-7888 or [disputes@cisive.com](mailto:disputes@cisive.com) Consumer report file disclosure and reinvestigation requests are subject to processing in accordance with the requirements of the Fair Credit Reporting Act (FCRA) and other applicable law.

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

1. We may disclose information with your consent or as otherwise necessary or appropriate to process a transaction that you may request. For example, if you submit information to request a report about an individual or yourself, that information may be disclosed to third parties in connection with obtaining information for the report that you requested such as court clerks for verification of criminal records, educational institutions for verification of education credentials, past-employers, departments of motor vehicles, credit bureaus, medical or physician networks and labs for drug or Covid-19 testing, etc. and other third-parties who are necessary to contact in order to properly provide the services requested. We may use contact information provided by you such as your cell phone number or email to send up updates or notifications regarding your use of the services.
2. We may disclose, as necessary, information that we collect through our websites or mobile applications with employees, agents, affiliated businesses, and service providers providing services on our behalf

3. 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.
4. 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.
5. 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 site or mobile application?**

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

If you use this site 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 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 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, whether you do so manually or using a widget offered on our site, 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 followed a link to your site from another website, whose privacy policy controls?**

The privacy policy posted on the website you were visiting, if any, would apply to any information collection that occurred on that site. Our privacy policy applies to your activity on our site.

**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 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 do you comply with Children's Online Privacy Protection Act ("COPPA")?**

COPPA regulates the collection of personal information online from children under the age of 13. This site is not intended or designed to attract users under the age of 13 or to collect personal information from such users. We do not collect personally identifiable data from any person we know to be under the age of 13 and those under 13 should not submit any personal information through this site. If we learn that we have inadvertently collected personal information from a child under the age of 13 we will remove the information from our files.

#### **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](mailto:disputes@cisive.com)

#### **EU-US/ Swiss-US Privacy Shield Framework**

**CARCO Group, Inc., dba Cisive as well as Cisive companies and covered entities Driver IQ and PreCheck comply with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States. CARCO Group, Inc., dba Cisive as well as Cisive companies Driver IQ and PreCheck have certified to the Department of Commerce that they adhere to the Privacy Shield Principles. 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>. CARCO Group, Inc., dba Cisive as well as Cisive companies and covered entities Driver IQ and PreCheck commit to cooperate with EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) and comply with the advice given by such authorities with regard to human resources data transferred from the EU and Switzerland in the the context of the employment relationship.**

#### **PRIVACY NOTICE: California Investigative Consumer Reports**

This notice is provided for California residents. Cisive is an investigative consumer reporting agency that prepares and processes "investigative consumer reports" about California residents (i.e. consumer reports containing information about an individual's character, general reputation, personal characteristics or mode of living) to employers for their use for employment purposes, including whether to hire, promote or retain an individual.

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

Privacy Practices: Cisive's policies and procedures for preparing and processing investigative consumer reports are designed to comply with the requirements of the California Investigative Consumer Reporting Agencies Act (Cal. Civ. Code § 1786.10 et. seq.) and the federal Fair Credit Reporting Act (15 U.S.C. § 1681 et. seq.). Cisive, for example, maintains policies and procedures designed to limit the purposes for, and circumstances under which, we furnish investigative consumer reports. Cisive maintains reasonable procedures to assure maximum possible accuracy of the information concerning the individual about whom the report relates. Cisive provides individuals with the ability to request, upon proper identification, access to information we hold about them in our investigative consumer reporting files. Cisive conducts reinvestigations of the accuracy and completeness of information at the individual's request. Cisive also has implemented administrative,

technical and physical safeguards designed to protect the information that Cative maintains in our investigative consumer reporting files.

Additional Information: To obtain additional information about Cative's privacy policies and practices in connection with its preparation and processing of investigative consumer reports, please contact:

Cative Group, Inc.

[privacypolicy@carcogroup.com](mailto:privacypolicy@carcogroup.com)

(631) 862-9300