

## **PFC Information Services Inc. (PFC) Privacy Policy Concerning Pre-employment Background Checks**

PFC Information Services Inc. (PFC) is a Consumer Reporting Agency (CRA) that prepares Consumer Reports for authorized employers under the provisions of the federal Fair Credit Reporting Act (FCRA). The PFC Privacy policy is very simple: PFC only collects applicant data pursuant to written Authorization and Disclosure under the FCRA and only disseminates consumer reports to employers and staffing agencies, as directed in the written authorization. In other words, data is only collected and distributed at the direction and authorization of consumers. The data is maintained in a secured site. PFC maintains strict policies and procedures in all aspects of its operation to protect the privacy of consumers.

PFC hereby confirms our strong policy to protect and maintain the privacy and personal data that we assemble and maintain on behalf of employers concerning consumers. PFC collects information on individuals for the purpose of providing the information to employers for employment related decisions. The information may also be provided to agents of employers such as recruiters or staffing firms. The data that is collected on individuals is used to provide employers with employment background checks and credentials verification on potential job applicants or current employees. The information is used by employers to make decisions on whom to hire, retain, promote or re-assign. It may also be utilized to conduct employee investigations where an employer has a suspicion of work related misconduct or wrongdoing, or an issue arises as to employee compliance with Federal, State, or local laws and regulations, or any employer policies. Human resources and security professionals within employer organizations will utilize the information. This notice covers human resources data that is obtained manually by this service on behalf of employers. The data is obtained by manually contacting the appropriate sources of the data. A consumer may find out more about the nature and scope of any inquiry that is made about them by contacting this service through the contact links on this web site.

Information is retained pursuant to the FCRA for a minimum of six (6) years. The method for a consumer to opt-out of PFC obtaining information is to not consent to a pre-employment background screening with a prospective or current employer. Once a consumer has consented to such a screening, PFC must retain information on file for US residents for the six (6) year period. In the event PFC destroys any information provided by employers, applicants, or third parties during the course of its work, the destruction is accomplished in accordance with the approved document disposal rules formulated by the Federal Trade Commission (FTC).

Any consumer may exercise their right to inspect any data about them and to object to any data pursuant to the FCRA and applicable state law. PFC provides access to consumers on all data collected about a consumer in order to allow a consumer the reasonable opportunity to ascertain what personal data this service possesses about a consumer, and to correct, amend or delete information that is inaccurate or incomplete. Disclosure is provided under the terms of the federal Fair Credit Reporting Act. A consumer is entitled to a copy of their report under the terms of the FCRA. However, the service also reserves the right to engage in reasonable efforts to confirm the identity of anyone requesting data, so that we only provide data to the consumer that is the subject of the data. Although we make every effort to ensure that the data we collect and store about you is as accurate as possible, PFC cannot guarantee that third parties are accurate in information that is transmitted and therefore we are not responsible for the data. We are not responsible for the accuracy of data about you that may be supplied by any other third-party sources of information or our clients.

Any questions or concerns about Privacy should be directed to [info@pfcinformation.com](mailto:info@pfcinformation.com). PFC will make all reasonable efforts to address a consumer's concerns. If the matter cannot be resolved by PFC, then a consumer has additional rights.

PFC takes all reasonable procedures to protect personal and identifiable information from loss, misuse and unauthorized access, disclosure, alteration and destruction. If you have any questions about the security of our service, you can send an email to the contact links on this web site.

Upon request, a consumer may also obtain a copy of this PFC Privacy Policy privacy statement or ask questions by mail by sending a request to: PFC Information Services Inc., 6114 La Salle Ave, P.O. Box 638, Oakland, CA 94611-2802.

PFC reserves the right to modify or change its privacy policy. All such changes will be posted on this page.

## **PERSONAL INFORMATION DISCLOSURE: UNITED STATES OR OVERSEAS**

PFC does NOT send U.S. applicant information outside of the U.S. for processing. Once data leaves the U.S., the data is beyond the reach of U.S. privacy laws and there are no meaningful privacy protections. PFC believes that firms that send data outside the U.S. put applicants and employers at great risk for identity theft. The only exception to our policy of no off-shoring of information is if PFC is asked to perform an international verification and the information resides outside of the U.S. Even in that situation, if it is necessary to have a researcher conduct research in a foreign country, PFC only releases the minimum information absolutely necessary. PFC strongly advises all employers to ask a screening firm if they send data outside of the U.S. and to seriously consider the dangers to their hiring processes and to their applicants.

PFC Information Services Inc. (PFC) opposes the “offshoring” of Personally Identifiable Information (PII) of consumers – such as names, dates of birth, and Social Security numbers (SSNs) – sent overseas outside of the United States and its territories and beyond the protection of U.S. privacy laws. PFC’s mission is to protect the PII of consumers, which is best done by keeping all such information in the United States.

PFC belongs to Concerned CRA's (<http://www.concernedcras.com/>), a group of Consumer Reporting Agencies (CRAs) dedicated to protecting consumer privacy by not offshoring PII. PFC has adopted the policy of Concerned CRA's and operates in as follows:

1. Domestic Background Screening: Where a CRA (background screening firm) is providing background screening services for consumers in the United States based upon information available in the U.S., a firm displaying the Concerned CRA seal certifies that it does not send data outside the U. S. or its territories for processing or preparation of a background check report or for any other reason. All work is done in the U.S.
2. International Screening: Where there is an international background check for verification of employment, education, or a professional degree, or for a criminal record check, some information may have to go offshore by necessity since the information being sought is offshore. However, firms displaying the Concerned CRA seal have taken measures to protect personal and confidential data: a) Documentation or information such as passport numbers, or unique identification numbers and date of birth, are not sent to anyone overseas other than the actual verification provider (e.g. employer or school registrar) whenever possible. b) Where it is necessary to utilize a local firm, the local firm will first be asked to provide local contact information so that the CRA can contact the foreign verifying party directly. c) If, due to infrastructure or other issues in a foreign country, a foreign research firm must perform the verification, then the CRA or its agent has properly vetted the local firm, and will redact any unnecessary information.
3. Where a CRA utilizes a third party service to perform domestic or international services in connection with providing background reports, firms that adopted this standard have made reasonable inquiries to ensure that any provider is also following the Concerned CRA standard.

If you have any questions about this offshoring policy, or any other aspect of the PFC privacy policy, you may contact PFC Information Services Inc. as follows: E-mail: [info@pfcinformation.com](mailto:info@pfcinformation.com) Address: 6114 La Salle Ave, P.O. Box 638, Oakland, CA 94611 Phone: 510-336-9791