

Consumer Information Privacy Policy

With respect to some of the services J. J. Keller & Associates, Inc. (“J. J. Keller,” “we,” or “us”) provides, we are a consumer reporting agency as defined under the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.* (FCRA). Our services include, driving record verification, and safety performance history verification and background checks. This Consumer Information Privacy Policy describes our policy and practices as a consumer reporting agency for protecting consumer information, including the collection and intended use of consumer information, the sharing of consumer information, and how the consumer information is stored and destroyed.

Purpose of Collection and Intended Use of Consumer Information

J. J. Keller collects consumer information for the purpose of generating a consumer report or an investigative consumer report. We obtain individual consumer information only upon the request of an end user who has a permissible purpose under the FCRA to request information about that consumer. The consumer is required to complete an Acknowledgement and Authorization Form consenting to the collection and use of consumer information and is informed in writing of the permissible purpose for which J. J. Keller and/or our client/the end user intends to use the consumer information. Consumer information is collected for conducting background checks, safety performance history verification, and driver record verification for employment-related purposes only. We do not maintain a commercial database of consumer information. Any information we gather on any consumer is provided only to the end user authorized by the consumer to receive the information.

Sharing of Consumer Information

J. J. Keller does not share, sell, or disclose consumer information with any third party other than the requesting end user, except as stated in this policy. 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 the user; (ii) to the extent necessary or appropriate to comply with applicable laws or regulations, or if necessary to protect the rights, property or legal claims of J. J. Keller, its affiliated companies, or clients; or (iii) in the event of an actual or contemplated transaction where all or a portion of J. J. Keller or our assets are acquired by another company or divested.

How Consumer Information Is Stored and Destroyed

J. J. Keller takes reasonable steps to maintain the confidentiality and security of consumer information obtained by and/or provided to us, including physical, electronic, and operational measures to protect consumer information from loss, misuse, unauthorized access, disclosure, alteration and/or destruction. Our privacy initiatives and procedures include, but are not limited to:

- Limiting access to confidential consumer information within J. J. Keller to those who have a need to know the information;

- Securing against unauthorized access to computer terminals, file cabinets, fax machines, trash bins, desktops;
- Maintaining a secure network to safeguard consumer information from internal and external threat;
- Maintaining backup data in encrypted form;
- Maintaining access controls that prohibit those without business justification to view files or databases;
- Destroying consumer information in accordance with the Federal Trade Commission's requirements that the information be rendered inaccessible, unreadable and/or unrecoverable upon disposal.

If you have any questions regarding this policy, you may contact us at:

Email: webinfo@jjkeller.com

Effective date: August 21, 2019