

ActiveTracks Privacy Policy & FCRA Compliance Statement

ActiveTracks Privacy Policy

Overview

ActiveTracks, Inc. has established policies and procedures dedicated to maintaining the privacy of personal information while providing its clients with the necessary information for making informed decisions involving background screening and *ActiveTracking*[™]. Our clients often represent current and or potential employers engaged in pre- or post-employment background screening on individuals who have provided consent to have their personal information released and used for background screening purposes; in addition our clients largely represent financial professionals or firms screening third party vendors or other service providers also with the subject's consent. Individuals can also use ActiveTracks to access their background information by submitting personal information directly. ActiveTracks does not differentiate between company clients and individual clients and this privacy policy applies to both. This policy incorporates the practices of ActiveTracks as they pertain to data submitted by clients via the ActiveTracks Website, telephone or email, and to other information secured from third parties and other sources in connection with delivering background screening information or results to our clients. All data is collected, stored and delivered in compliance with applicable law, including the Fair Credit Reporting Act (FCRA), and other local, state, and federal laws. Reports on monitoring alerts based on personal information about the consumer will only be released to the entity or entities to whom the consumer consented to receive such information. This information will not be released to any other individual and will not be used for any other purpose by ActiveTracks.

Non-Personal Information

ActiveTracks sometimes collects and stores non-personal data submitted by individuals that are neither clients nor employees or prospective employees of clients and are inquiring about services provided by ActiveTracks (e.g. contact inquiry section). This data is collected for market analysis purposes.

Personal Information

Personally Identifiable Information (PII) provided to us or submitted through the ActiveTracks Website is subject to the following policies, procedures and principles:

Security

We take steps to protect against the loss, misuse, or unauthorized alteration of personally identifiable information collected through this web site and otherwise subject to this policy. We recognize the importance of security for all personally identifiable information collected. Once we receive personally identifiable information, we take steps to protect its security on our systems. In the event we request or transmit sensitive information, such as credit card information or Social Security Numbers through this web site, we use industry standard, secure socket layer (SSL) encryption.

We limit access to personally identifiable information to those employees who need access in order to carry out their job responsibilities.

Information Use

ActiveTracks clients may provide personal information regarding their employees, prospective employees, vendors, tenants, or "subjects" via our Website (www.activetracks.net) when placing an order for background screening services. Information provided may include but is not limited to residential history, personal history including name, date of birth, Social Security Number, Motor Vehicle Operator's License Number, Professional License information, employment history, education and other credentials.

ActiveTracks will use information provided by the client and subject of the order, along with any other information provided by third-parties, only for the execution of producing a background screening report or screening monitoring for the client placing the order, and for no other purpose.

While executing orders for our clients, ActiveTracks may transfer personal information between our Website, our client and our client's employees, prospective employees, vendors, or other "subjects".

ActiveTracks will not process personal information in a way that is incompatible with the purposes for

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which it has been collected or subsequently authorized by the individual. We reserve the right to employ other organizations or individuals as our subcontractors, to perform functions on behalf of ActiveTracks. These organizations and individuals will not share information with any third party, other than ActiveTracks' subcontractors or clients.

We do not share, sell, rent or trade PII with third parties for their promotional purposes.

Opting Out

We may contact you in response to your comments or inquiries, as part of the maintenance of your account with us (if you have one), or in order to complete a transaction that you requested.

We may also contact you to inform you of other products or services we think may be of interest to you, but we always offer you an opportunity to opt not to receive such communications.

If you decide that you do not want to receive further e-mails regarding your inquiry from ActiveTracks, you can reply to the e-mail with a request that we not continue to e-mail you.

Data Privacy Principles

The ActiveTracks Data Privacy Principles speak to the personally identifiable information including sensitive personally identifiable information, collected, maintained, used or disseminated in connection with services offered by ActiveTracks, or by its affiliates (all hereinafter "ActiveTracks").

ActiveTracks applies these Principles to our domestic U.S. products and services where appropriate. In addition, other uses or disclosures may occur as required by applicable law, such as the Fair Credit Reporting Act and its state analogues ("FCRA"), the Driver's Privacy Protection Act and its state analogues ("DPPA"), and the Gramm-Leach-Bliley Act ("GLB"). If the law requires or upon request of law enforcement, or, if necessary, to prevent fraud or to protect our computer systems, these principles may not apply. ActiveTracks also, from time to time, may revise our Data Privacy Principles by posting changes on its Web site. We also apply this privacy policy in the offline context during the course of normal business in those limited cases where we require a consumer to provide his or her Social Security Number in order for the consumer to order an information product by mail or telephone.

Confidentiality and Outsourcing

Personal Information about you may only be furnished to third parties that have a permissible purpose, however we may disclose information about you to third parties in order to complete a transaction that you requested. If, for example, you pay for a transaction using a credit card, disclosing that information for processing purposes is necessary to complete the transaction. In other cases, it may be necessary to disclose information you provide about yourself or third parties in order to obtain the information product you requested. We may also outsource some tasks, including the operation of some website functions, that require access to information you supply online. In such cases, however, we require that the companies acting on our behalf abide by our privacy policy and institute safeguards to protect the confidentiality of your information. Finally, please note that we may disclose personal information when required by law or in the good faith belief that such action is necessary in order to conform with the law or to comply with a legal process.

Our Commitment To Children's Privacy

Protecting the privacy of the very young is especially important. For that reason, we never collect or maintain information at our website from those we actually know are under 13, and no part of our website is structured to attract anyone under 13.

Changes

This Privacy Policy may be modified or amended at any time without prior notice. Please review this Privacy Policy prior to contacting ActiveTracks with requests or questions..

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Accountability

The Federal Trade Commission is charged with overseeing the operations of CRAs and enforcing Fair Credit Reporting Act requirements. While performing some services for clients ActiveTracks may at times be subject to the Fair Credit Reporting Act, and when applicable operates within its framework.

Fair Credit Reporting Act (FCRA) Policy Summary of Regulation

The Fair Credit Reporting Act (FCRA) regulates Consumer Reporting Agencies (CRAs), users of consumer reports, and furnishers of consumer-related information to CRAs. This policy includes requirements based on amendments to the FCRA by the Consumer Credit Reporting Reform act of 1996 and the Fair & Accurate Credit Transactions (FACT) Act of 2003. The FCRA imposes requirements on ActiveTracks regarding:

- When ACTIVETRACKS can produce a consumer report (permissible purpose);
- Notice and disclosure requirements;
- Reporting accurate information
- Investigating disputes of information in consumer reports;
- Proper information disposal.

Definitions

A Consumer Report is any written, oral, or other communication of any information by a consumer reporting agency bearing on a consumer's creditworthiness, credit standing, credit capacity, character, general reputation, personal characteristics, or mode of living.

A Consumer Reporting Agency ("CRA" or "agency") is any person or entity that regularly engages in the practice of assembling or evaluating consumer credit information or other information on consumers for the purpose of furnishing consumer reports to third parties.

Permissible Purposes

A consumer report may only be obtained under the following circumstances:

- In accordance with the written instructions of the consumer
- In connection with a credit transaction involving the consumer
- For employment, Insurance, Licensure purposes
- In connection with a review of an existing account
- Other legitimate business need

When a consumer report is used for employment purposes, the applicant must be provided with a notice of the employer's intent to obtain a consumer report. The notice must be a separate disclosure, which the applicant must sign. ActiveTracks provides a sample disclosure and authorization form to employer clients.

Consumer report information is considered non-public personal information (NPI) under the Gramm-Leach-Bliley Act of 2002 and will be treated as such.

For additional information about privacy or consumer reporting, visit the following Web sites:

Federal Trade Commission: www.ftc.gov

Consumer Financial Protection Bureau: <http://www.consumerfinance.gov/>

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Consumer Data Industry Association: www.cdiaonline.org

Experian: www.experian.com/consumer/credit_education.html

Equifax:

https://www.econsumer.equifax.com/consumer/landing.ehtml?^start=&companyName=PSHP1_hpg

TransUnion: <http://www.transunion.com/corporate/personal/personal.page>

California Office of Privacy Protection: www.privacy.ca.gov

For credit reports from the credit bureaus:

<https://www.annualcreditreport.com/cra/index.jsp>

Accuracy

ActiveTracks will make every reasonable effort to ensure the accuracy of information delivered.

ActiveTracks relies on other entities, including but not limited to courts, educational institutions, news publications, social media sites, individuals and other sources for its information, including other CRA's, and therefore cannot guarantee the accuracy or timeliness of information reported.

Fairness

Information is obtained from various sources, however certain information over a specified time period may not be reported.

Retention

Pursuant to the FCRA, we maintain any reports which we generate for a minimum period of five years. ActiveTracks maintains written or electronic copies of information received in conjunction with services rendered for a period of five years. Information may be subsequently destroyed either electronically or mechanically.

Choice

Employees, prospective employees, tenants, vendors, or other "subjects" of our clients will be advised by the client that a background check will be conducted. U.S. residents that do not want personal data made available to our client should not submit the information in question to ActiveTracks via our client. Consent forms signed (electronically or by hand) by the consumer indicate the consumer agrees to provide personally identifying information, and consent to ActiveTracks' use of that information in accordance with this privacy policy.

Access

As the subject of a consumer report, the consumer has the right to any reports ActiveTracks produces and maintains on him or her once every twelve months for United States residents. Consumers may contact ActiveTracks via the contact information below to obtain a report including this information, if such a report has been created. In accordance with this policy and our efforts to maintain the privacy of personal data, ActiveTracks requires proof of a consumer's identity prior to delivering any personal information. Information will be mailed via U.S. Postal Service within 7 days of a consumer's request, in the same format it was delivered to our client. There will be no expense to a consumer for this information. Requests should include a photocopy of a government issued ID (driver's license, passport, etc.).

Requests should be submitted to:

Richard Finch, CFO and Compliance Officer

ActiveTracks, LLC

6075 Poplar Ave #223

Memphis, TN 38119.

800-311-6075

Richard.finch@activetracks.net

Correction

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If a consumer believes any information in ActiveTracks' possession is incorrect or inaccurate, he or she should contact ActiveTracks directly to discuss this with the support representative identified below.

Richard Finch, CFO and Compliance Officer

ActiveTracks, LLC

6075 Poplar Ave #223

Memphis, TN 38119.

800-311-6075

Richard.finch@activetracks.net

Using Medical Information

The FCRA limits the use of medical information regarding a consumer in the review or granting of credit.

The FCRA also prohibits sharing medical information regarding consumers with affiliates.

It is ActiveTracks' policy to use consumers' medical information (including collection items and judgments) only in compliance with the FCRA.

Security Freezes and Security Breach Notification Requirements

ActiveTracks is required to safeguard the information of consumers with which it conducts business.

Many states' statutes impose security breach notification requirements, and these requirements generally apply when certain customer information has been compromised. It is ActiveTracks' policy to follow state security breach notification requirements in any affected or applicable states in the event of a security breach involving ActiveTracks customers.

Preparation and Processing of Investigative Consumer Reports

An "investigative consumer report" is a consumer report based on personal interviews concerning information about a consumer's character, general reputation, personal characteristics, or mode of living. ActiveTracks compiles investigative consumer reports about individuals and provides them to business for background screening, tenant screening, and similar purposes.

To obtain additional information about the privacy practices and policies of ActiveTracks in connection with its preparation and processing of investigative consumer reports, please contact:

Richard Finch

CFO and Compliance Officer

800-311-6075

Richard.finch@activetracks.net