

Consumer Information Privacy Policy

Verified Credentials, Inc. is a consumer reporting agency. It is required by the Fair Credit Reporting Act, 15 U.S.C. §1681 et seq. ("FCRA") to maintain the confidentiality of all consumer information. Verified Credentials, Inc. obtains information on an individual consumer only upon the request of a user who has a permissible purpose under the FCRA to request information on that consumer. The FCRA requires a user to certify to Verified Credentials, Inc. that it has obtained the written consent of the consumer to request information before Verified Credentials, Inc. can supply the requested information¹. The user must submit to reasonable audits by Verified Credentials, Inc. to confirm it is obtaining such consent. Verified Credentials, Inc. does not maintain a commercial database of consumer information. Any information gathered on any consumer may only be provided to the user authorized by the consumer to receive the information. Verified Credentials, Inc. cannot and does not share, sell or distribute consumer information with or to any third party other than the requesting party thereof. Any consumer, upon proper identification, has the right under the FCRA to request Verified Credentials, Inc. to furnish to the consumer any and all information it may have on that consumer. The consumer has the right to dispute the accuracy or completeness of any information contained in the consumer's file. The consumer's rights under the FCRA may be obtained by contacting us or going to the Consumer Financial Protection Bureau's website at:

<http://www.consumerfinance.gov/learnmore>

However, Verified Credentials, Inc. may be required, upon receipt of a court order to release the information in civil litigation or as otherwise required by law, to disclose information regarding a consumer to law enforcement agencies. Other privacy initiatives and procedures include, but are not limited to:

- Access to confidential consumer information is limited within Verified Credentials, Inc. to those who have a need to know the information: obtaining and transmitting information on the consumer or those dealing with a consumer request for information or consumer disputes.
- Access to Verified Credentials, Inc. computer terminals, file cabinets, fax machines, trash bins, desktops, etc. are secure from unauthorized access.
- Verified Credentials, Inc. maintains a secure network to safeguard consumer information from internal and external threat.
- Any backup data is maintained in an encrypted form.
- Verified Credentials, Inc. maintains records on each request for information and identifies each user who requested information on a consumer.
- Employees are prohibited from "browsing" files or databases without a business justification.
- Destruction of consumer information follows the Fair Credit Reporting Act's requirements that the information be unreadable upon disposal.

¹ There is an exception for employer investigations of suspected employee misconduct or for compliance with law or employer policies, e.g., sexual harassment investigations.