

## **SCOTT-ROBERTS AND ASSOCIATES, LLC'S PRIVACY POLICY**

As a consumer reporting agency governed by the Fair Credit Reporting Act (FCRA), and other applicable state and federal laws, Scott-Roberts and Associates, LLC (Scott-Roberts) is committed to protecting your right to privacy.

This Privacy Policy covers Scott-Roberts' practices and policies regarding the receipt, storage, and use of "Personally Identifiable Information." This policy also covers the receipt of certain information through Scott-Roberts' public website and otherwise.

All information obtained by Scott-Roberts will be collected, stored, and used in compliance with applicable laws, including the FCRA.

### **Information Collection For Background Screening Purposes.**

Scott-Roberts will only collect "Personally Identifiable Information" about you if you voluntarily choose to provide such information to Scott-Roberts and/or in connection with a background check authorized by you and/or applicable laws. "Personally Identifiable Information" that Scott-Roberts may collect about you through our website or otherwise may include, but is not limited, to: name, address, email address, phone number, date of birth, birthplace, driver's license number, social security number, employer, employment details, and information regarding prior criminal proceedings, civil proceedings, or credit activities.

### **Use of Information.**

When Scott-Roberts requests "Personally Identifiable Information" from you, it will inform you about the purpose for collecting that information at the time of collection, and the information will be used only in the manner specified by Scott-Roberts when it is collected, unless you consent to another use.

If you have provided "Personally Identifiable Information" to Scott-Roberts in connection with a background check ordered by a client of Scott-Roberts, Scott-Roberts may use such information to conduct a background check for that client. Scott-Roberts will verify that its client has provided the necessary certification under the FCRA and/or other applicable law prior to using your information to conduct a background screen. Such certification will include a statement that Scott-Roberts' client has a legally permissible purpose for ordering the background check and that it has, where appropriate under applicable law, obtained your informed consent to conduct the background screen.

### **Personal Information Disclosure: United States or Overseas.**

Scott-Roberts will not disclose your personal information to a third party, except in accordance with applicable laws.

Typically, Scott-Roberts will only disclose personal information regarding the subject of a background check to a third party in the following situations:

- To an employer or prospective employer who has been authorized by the consumer to receive information about him or her.
- To a landlord or property owner who has been authorized by the consumer to receive information about him or her.
- To a third party representative or subcontractor of Scott-Roberts to assist in the background screening investigation (e.g. providers that support or host this website or otherwise provide technical assistance, as well as court researchers and other service vendors).
- As otherwise required by law.

Where Scott-Roberts transfers personal information to a representative or third party subcontractor assisting with a background check, Scott-Roberts provides only the information required to assist with the background check. Scott-Roberts prohibits such third-party representatives and subcontractors from using consumer information for any purpose other than assisting Scott-Roberts with the background check. Scott-Roberts also contractually requires such third party representatives and subcontractors to maintain commercially reasonable measures to protect the confidentiality of consumer information they receive.

Generally, Scott-Roberts does not transfer information to third parties outside of the United States or its territories. Such transfers would be done if necessary to complete an international background check (e.g., conducting an international criminal check or verifying educational or employment records outside of the U.S.).

If Scott-Roberts or its assets are acquired by another company, that company will assume responsibility for the personal information collected by Scott-Roberts through the website, and it will assume the rights and obligations regarding the collection and use of such information, as described in this Privacy Policy. Scott-Roberts will not permit another business in such a circumstance to review or examine the information Scott-Roberts has collected without a confidentiality agreement in place and only to the extent required by law.

### **Data Security.**

Scott-Roberts utilizes Secure Socket Layer (SSL) data encryption when data is transmitted over the Internet to the website. Scott-Roberts also utilizes layered firewalls and other security technologies to prevent unauthorized access. Scott-Roberts also has other administrative, technical, and physical safeguards in place designed to protect the information that Scott-Roberts collects from you through the website. Access to “Personally Identifiable Information” is limited to those Scott-Roberts employees who need access in order to carry out their job responsibilities.

When data is ready to be destroyed or disposed of, Scott-Roberts will follow all applicable laws and regulations and take measures to ensure that all such records and data are destroyed and unrecoverable.

Access to certain portions of Scott-Roberts' website is restricted to Scott-Roberts' clients only, and requires a user login and password. On these web pages, Scott-Roberts collects only information that the client voluntarily provides to Scott-Roberts, such as the information requested on a new client application form. This information is used for internal purposes only or as otherwise described in this Privacy Policy.

### **Links.**

Scott-Roberts' website may provide links to third-party websites. These websites are outside of Scott-Roberts' control and are not covered by this Privacy Policy. If you have questions about how another website may use your information, please consult that website's privacy policy.

### **Children Under Age 13.**

Scott-Roberts does not offer services to children under the age of 13, and Scott-Roberts' website is not directed to children under the age of 13.

### **Access and Correction.**

Scott-Roberts strives to maintain the accuracy and integrity of the information collected through the website. If you have provided "Personally Identifiable Information" to Scott-Roberts while browsing the public website and desire to access or update such information, please email us at [info@scottrobertsassociates.com](mailto:info@scottrobertsassociates.com).

If you are a Scott-Roberts' client with a registered account, you may review and update your information by logging into your account. If you are an individual on whom Scott-Roberts' client has requested a background screening investigation, and you have submitted "Personally Identifiable Information" to Scott-Roberts at the request of such client for purposes of the background screening investigation, you may review your Scott-Roberts file in accordance with your file disclosure rights under the FCRA, California Civil Code Section 1786.22 or any other applicable law by contacting Scott-Roberts at 888-605-4265.

### **Policy Changes and Additional Information.**

Scott-Roberts may revise this Privacy Policy from time to time. If Scott-Roberts makes any material changes to the Privacy Policy, the date of the most recent revision will be stated on the Privacy Policy so you can determine whether there have been any material changes since your last review of the Privacy Policy. In addition, Scott-Roberts will send a copy of this Privacy Policy by U.S. Mail to any client, consumer, or other interested third-party upon request.

**Contact Information Regarding Privacy Policy.**

To obtain additional information regarding our privacy practices, or to obtain information regarding policies in the event of a compromise of your personal information, please contact:

**Andrew J. Scott - Vice President**

**or**

**Robert Buchholz - President**

**2290 10th Avenue N, Suite 500**

**Lake Worth, FL 33461**

**888.605.4265**

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**This Privacy Policy was last updated: October 15, 2016**