Private Eyes

Privacy Policy

Policy Area	IT Policy Library
Approved Date	December 31, 2017
Approved By	Policy Committee
Effective Date	January 7, 2018
Current Version	1.3

1. Overview

Private Eyes Screening Group, Inc. ("Private Eyes") is committed to protecting the privacy, confidentiality, integrity, and security of Personal Information and Consumer Information entrusted to us.

This Privacy Policy describes:

- Information collected by Private Eyes;
- Why is the information collected;
- How the information is used;
- How the information is shared;
- How the information is stored and protected;
- How the information is retained and destroyed; and
- The rights are available to consumers regarding their information.

2. Purpose

The purpose of this Policy is to establish privacy requirements for the collection, use, disclosure, storage, retention, and destruction of Personal Information and Consumer Information and to inform consumers, applicants, clients, vendors, researchers, employees, and other affected parties of these practices.

3. Scope

This Policy applies to:

- Consumers
- Applicants
- Clients
- Website users
- Contractors
- Vendors
- Researchers
- Employees
- Third-party service providers

This Policy applies to all Personal Information and Consumer Information collected, processed, stored, transmitted, or maintained by Private Eyes.

4. Definitions

Personal Information
Information that identifies, relates to, describes, references, or could reasonably be linked to an identifiable individual.
Consumer Information
Personally identifiable information relating to an applicant, employee, consumer, customer, or report subject.
Sensitive Information
Information requiring heightened protection including:

- Social Security Numbers
- Driver License Numbers
- Motor Vehicle Records
- Dates of Birth
- Financial Information
- Account Credentials
- Government Identification Numbers
- Consumer Reports
- Employment Screening Information

5. Information We Collect

Private Eyes may collect information directly from individuals, clients, public records, authorized third parties, service providers, websites, applications, and other lawful sources.
Information collected may include:

- Name
- Address
- Email address
- Telephone number
- Date of birth
- Social Security Number
- Usernames
- Account information
- Income Statements
- PII Information
- Education Information
- License Inforation
- Consumer report information
- Employment information
- Device information

- Browser information
- Session information
- Usage data
- Information submitted through forms and communications

Private Eyes may also collect information automatically through websites, applications, cookies, analytics tools, security monitoring systems, and similar technologies.

Personal Information may be collected directly from consumers, applicants, clients, public records, authorized third parties, government sources, service providers, websites, mobile applications, forms, communications, and other lawful sources.

6. Purpose of Collection

Private Eyes collects Personal Information and Consumer Information for legitimate business purposes, including:

- Background screening services
- Employment screening services
- Identity verification
- Client-requested services
- Consumer communications
- Customer support
- Fraud prevention
- Security monitoring
- Compliance with legal obligations
- Regulatory requirements
- Audit requirements
- Internal administration
- Quality assurance
- Analytics and service improvement
- Protection of rights, interests, and assets
- Incident response and security investigations

Information shall not be collected in a manner inconsistent with applicable law.

Personal Information may be processed pursuant to:

- Consumer consent;
- Contractual necessity;
- Legal obligations;
- Regulatory requirements;
- Legitimate business interests;
- Protection of rights and interests; or
- Other lawful bases recognized under applicable law.

Where required by law, Private Eyes shall obtain appropriate consent, authorization, disclosure acknowledgements, or consumer permissions before collecting, using, processing, or disclosing Personal Information.

7. Intended Use of Information

Consumer Information shall only be used:

- For the purpose for which it was collected;
- For purposes disclosed to the consumer;
- For purposes authorized by the consumer;
- For legal, contractual, or regulatory obligations; or
- As otherwise permitted by law.

Private Eyes will not process information for unrelated or incompatible purposes without appropriate authorization or legal basis.

8. Information Sharing and Disclosure

Consumer Information shall only be disclosed to individuals or entities with a legitimate business need, permissible purpose, or legal authority to receive such information.
Recipients may include:

- Clients
- Authorized service providers
- Contractors
- Background screening partners
- Technology providers
- Legal Counsel
- Auditors
- Government authorities when legally required
- Law enforcement when legally required

Private Eyes limits disclosure to the minimum information necessary for the intended purpose.
Private Eyes may disclose information to service providers performing services on our behalf, including communications providers, analytics providers, hosting providers, and technology vendors.

Third-party service providers, vendors, contractors, hosting providers, and sub processors receiving Personal Information must be contractually obligated to maintain appropriate privacy, confidentiality, and security protections consistent with applicable law and organizational requirements.

9. International Transfers

Personal Information may be processed, stored, or transferred outside the consumer's jurisdiction when necessary to provide services, maintain business operations, comply with legal obligations, or utilize service providers. Appropriate safeguards should be implemented where required by law.

10. Information Storage and Security

Consumer Information shall be protected by administrative, physical, and technical safeguards.
Security controls may include:

- Access controls
- Authentication mechanisms
- Multi-factor authentication
- Encryption
- Firewalls
- Monitoring systems
- Security logging
- Intrusion detection
- Vulnerability management
- Role-based access controls
- Vendor security assessments

Access shall be restricted to personnel with a legitimate need to know.
Private Eyes uses reasonable measures designed to prevent unauthorized access, disclosure, modification, misuse, or destruction of information.

11. Data Retention

Personal Information and Consumer Information shall be retained only as long as necessary to:

- Provide services
- Satisfy legal obligations
- Meet contractual requirements
- Resolve disputes
- Support audits
- Enforce agreements
- Protect the rights of Private Eyes

Additional retention may occur when required by law or regulatory obligations.

12. Data Destruction

When retention is no longer required, Personal Information and Consumer Information shall be securely destroyed.
Approved disposal methods may include:

- Cross-cut shredding
- Secure electronic deletion
- Media sanitization
- Cryptographic erasure
- Physical destruction
- Approved destruction services

Information shall be destroyed in a manner that prevents reconstruction, unauthorized access, or future disclosure.

13. Data Quality

Private Eyes will take reasonable steps to maintain Personal Information in an accurate, complete, current, and relevant form appropriate for the purposes for which it is used. Individuals may request correction of inaccurate information where permitted by law.

14. Security Incidents

Suspected or confirmed unauthorized access, disclosure, alteration, loss, or destruction of Personal Information shall be investigated and handled in accordance with the Incident Response Policy. Notification shall be provided when required by applicable law, regulation, customer contract, or regulatory requirement.

15. Individual Privacy Rights

Where applicable, individuals may have rights to:

- Access information
- Correct inaccurate information
- Request deletion of information
- Restrict processing
- Withdraw consent
- Receive copies of information
- Object to certain processing activities

Requests may be submitted using the contact methods listed in point 20.

Private Eyes shall respond to privacy requests within the timeframe required by applicable law. Additional verification may be required prior to fulfilling a request to ensure protection of Personal Information.

16. Children's Privacy

Services are not directed toward children under the age of 13. Private Eyes does not knowingly collect Personal Information from children under 13 except where legally permitted or authorized by a parent or guardian.

17. Cookies and Website Tracking

Private Eyes websites may utilize cookies, analytics technologies, session management tools, security monitoring tools, and similar technologies to improve functionality, security, user experience, and service performance.

18. Website Publication

Private Eyes shall publish and maintain the current Privacy Policy on its public website.
The website version shall be reviewed periodically and updated as appropriate.

19. Policy Availability Upon Request

Consumers, applicants, and clients may request a copy of this Privacy Policy at any time.
Private Eyes shall provide the Privacy Policy through one or more alternate methods, including:

- Email delivery
- Printed copy by mail
- Printed copy in person
- Client portal access
- Other reasonable electronic delivery methods

Requests may be submitted using the contact information below.

20. Contact Information

Privacy-related requests may be submitted to:
Private Eyes Screening Group, Inc.
9080 Double Diamond Parkway, Suite C
Reno, NV 89521
Email: support@privateeyesbackgroundchecks.com

21. Changes to this Policy

Private Eyes may modify this Privacy Policy periodically.
Material changes may be communicated through:

- Website publication
- Electronic notification
- Client communications
- Other appropriate notification methods

Individuals are encouraged to review the Privacy Policy periodically.

22. Enforcement

Violations of this Privacy Policy may result in disciplinary action, contract termination, legal action, regulatory reporting, or other corrective measures as appropriate.
The Chief Security Officer (CSO) or another individual designated by Private Eyes shall be responsible for oversight of the Privacy Program, administration of this Policy, privacy compliance activities, consumer privacy requests, and coordination of privacy-related investigations and incident response activities.

Policy History

Version	Date	Description	Approved By
1.0	1/1/2018	Initial policy release	Policy Committee
1.0	1/2/2019	Policy Review	Policy Committee
1.0	1/2/2020	Policy Review	Policy Committee
1.0	1/4/2021	Policy Review	Policy Committee
1.1	1/7/2022	Policy Updated	Policy Committee
1.1	1/4/2023	Policy Review	Policy Committee
1.1	1/4/2024	Policy Review	Policy Committee
1.1	1/14/2025	Policy Review	Policy Committee
1.2	06/24/2026	Policy Review	Policy Committee
1.3	09/24/2026	Policy Updated	Policy Committee