# NOTICE OF DATA COLLECTION, PROCESSING AND TRANSFER (INTERNATIONAL)

As part of the application process, the entity with which you seek employment or admission (the "Company") will engage Certiphi Screening, Inc. ("Certiphi") to conduct a background check on you. This Notice provides the following information about the background check:

- What Personal Data the Company collects about you and the legal basis for the collection and processing;
- How the Company uses your Personal Data and for what purposes;
- To whom the Company discloses your Personal Data;
- Any international transfers of your Personal Data;
- How the Company safeguards your Personal Data; and
- Your rights regarding your Personal Data.

## For purposes of this Notice,

- "Personal Data" means any information concerning an identified or identifiable individual; and
- "Processing" means any operation with respect to Personal Data, such as collection, retrieval, access, use, disclosure, storage or disposal of Personal Data.

## Collection, Use and Purpose of Processing, and Disclosure of Your Personal Data

<u>Collection</u>: The background check will involve, to the extent permitted by applicable law, verifying information that you have provided during the application process and collecting additional information about you.

If directly relevant to the position that you are seeking and to the extent permitted by applicable law, the background check will collect information about your criminal convictions and offenses, if any, and about your credit history. This is determined by the Company.

<u>Legal Basis for Processing</u>: The collection, use and disclosure of this background information is necessary for the Company to determine whether to enter into an employment agreement with you, or extend an offer of admission where applicable. In addition, certain aspects of the background check, such as verification of your identity, are required by law.

<u>Use and Purpose of Processing:</u> The information collected will be compiled in a report ("Background Report") that will contain your Personal Data. The Company will use the Background Report to evaluate your application for employment or admission. This evaluation is necessary for the Company to pursue its legitimate interests. For those seeking employment, if you apply for a different position within the Company, the Personal Data in the Background Report may be accessed again to evaluate your application. If you do not provide the Personal Data necessary for the Company to conduct the background check, the Company may determine that you are not eligible for employment with the Company.

<u>Disclosure</u>: The Company will not disclose the Background Report to any third party outside the Company without your prior written consent unless required by law to do so. If you apply for employment with a different business unit within the Company, the Company may disclose the Background Report to that entity.

#### International Transfers of Personal Data

<u>Transfer to Certiphi Screening</u>: The Personal Data collected about you, as described above, will be transferred to Certiphi Screening, which is located in the United States.

<u>Transfer within the Company</u>: For those seeking employment, if you apply for a different position within the Company, the Personal Data in the Background Report may be accessed by employees of the Company directly involved in the hiring process. These other entities may be located in other countries that provide

different data protection standards from those in your country. Your Personal Data will be transferred only to the extent permitted by applicable law.

## Security Measures for Personal Data

Whether in the possession of Certiphi Screening or the Company, your Personal Data will be protected by reasonable and appropriate administrative, physical, and technical measures. For example Certiphi Screening requires a unique user name and password to access Background Reports, and the Company provides such log-in credentials only to employees with a need to know.

## Your Rights With Respect to Your Personal Data

You have the right to access your Personal Data and to request that the Company update, correct or delete your Personal Data as provided by applicable law. You also have the right to object to the Company's processing of your Personal Data as provided by applicable law.

The Company will notify you how you can exercise these rights and provide further information and assistance. The Company will respond to such requests in accordance with applicable data protection law.

The Company requests below that you consent to the processing of your Personal Data as described above. If you do consent, you may use the contact information above to revoke your consent at any time. Any revocation shall not affect the lawfulness of processing based on consent before its withdrawal, and the Company will continue to retain the information that you provided us before you revoked your consent for as long as allowed or required by applicable law.

#### CONSENT TO PROCESSING AND TRANSFER OF PERSONAL DATA

I have read and understood the Notice, above.

I authorize Company to procure a Consumer Report which includes information from sources outside the United States. I understand that the Consumer Report will be prepared by Certiphi Screening, Inc., a Vertical Screen company, and I authorize Certiphi Screening, Inc., a US-based Consumer Reporting Agency, and its agents, to retrieve the necessary information and prepare a Consumer Report. I understand and authorize that some or all of my information may be transmitted electronically and, when required, may be transferred across international borders. I understand that Certiphi Screening, Inc. may transmit my personal information to its agents and information sources as necessary throughout the course of business and that host country and receiving country privacy laws will be observed if information is transferred across international borders. I understand that my personal information will be retained by Certiphi Screening, Inc. in accordance with the US Fair Credit Reporting Act (FCRA), 15 U.S.C. 1681, et seq. Certiphi Screening, Inc. is a company and meets or exceeds the level of privacy protection required by the European Union, Switzerland, and the United Kingdom.

I understand that my background investigation will be based on information that I provided in my Employment Application, Curriculum Vitae/Resume, Disclosure/Authorization, and/or the information requested below (together called "Source Documents"). My personal information will not be shared with any person, organization, or company other than those entities acting as an authorized agent of Certiphi Screening, Inc. for the specific purpose of verifying the information I provided unless required by law or I specifically authorize. I understand that providing false information or failing to provide the information or consent requested may result in my exclusion from consideration for employment or for admission. I understand that I am not obligated to provide the requested consent or information, but my failure to do so may result in my exclusion from consideration for employment or admission. I authorize Certiphi Screening, Inc., as part of my consumer report, to obtain, and the respective sources to provide, any of the following information:

- Academic/ Education
- Address Verification
- Adverse Media/ Open Source Data
- Credit/Financial/Bankruptcy/ Insolvency
- Criminal Records History
- Civil Records
- Directorship
- Driving Record
- Identification Verification
- Professional License/ Professional Membership/ Professional Designation
- Personal Reference
- Employment
- Employment Reference
- Sanctions/Watch List
- Work Eligibility

I may request a copy of any report that is prepared regarding me and "A Summary of Your Rights under the Fair Credit Reporting Act." I may also request the nature and substance of all information about me contained in the files of the consumer-reporting agency. I understand I have the right to inspect those files with reasonable notice during regular business hours and I may be accompanied by one other person. I understand that I have the right to dispute any information contained in the consumer report, if I believe it is false, inaccurate or misleading. The consumer-reporting agency is required to provide someone to explain the contents of my file. I understand proper identification will be required and I should direct my request to: Certiphi Screening, Inc., Applicant Services Department, P.O. Box 541, Southampton, PA 18966 USA.

Telephone (800) 260-1680. www.certiphi.com. Certiphi Screening's privacy practices with respect to the preparation and processing of investigative consumer reports may be found at www.certiphi.com (link at bottom of page entitled, "Privacy Policy").

I authorize all governmental and private agencies, including those located within the European Union, or any member state thereof, Asia Pacific (APAC), Middle East, North America, Australia, South America or African regions, to release my personal information to Certiphi Screening or the Company, as specified above. I acknowledge and agree that this Background Check Consent Form shall remain valid and in effect during the term of my contract.

This consent is effective from the date specified on this form until the date my employment application, or application for admission, is accepted or denied by the above-named company, or until I withdraw my authorization in writing. I acknowledge and agree that a photocopy of this authorization may be accepted with the same authority as the original.

I authorize Certiphi Screening, Inc. to prepare a Consumer Report/Investigative Consumer Report on me, and I authorize the above-named Company to procure a Consumer Report/Investigative Consumer Report about me from Certiphi Screening, Inc.

Signature

Printed Name

Today's Date: 

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