

# Subject Information Privacy Policy

With respect to some of the services J. J. Keller & Associates, Inc. ("J. J. Keller," "we," or "us") provides, we are a consumer reporting agency as defined under the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (FCRA). Our services include, driving record verification, and safety performance history verification and background checks. This Subject Information Privacy Policy describes our policy and practices as a consumer reporting agency for protecting subject information, including the collection and intended use of subject information, the sharing of subject information, and how the subject information is stored and destroyed.

## Purpose of Collection and Intended Use of Subject Information

J. J. Keller collects subject information for the purpose of generating a consumer report or an investigative consumer report. We obtain individual subject information only upon the request of an end user who has a permissible purpose under the FCRA to request information about that subject. The subject is required to complete an Acknowledgement and Authorization Form consenting to the collection and use of subject information and is informed in writing of the permissible purpose for which J. J. Keller and/or our client/the end user intends to use the subject information. Subject information is collected for conducting background checks, safety performance history verification, and driver record verification for employment-related purposes only. We do not maintain a commercial database of subject information. Any information we gather on any subject is provided only to the end user authorized by the subject to receive the information.

## Sharing of Subject Information

J. J. Keller does not share, sell, or disclose subject information with any third party other than the requesting end user, except as stated in this policy. We may disclose subject information: (i) to our corporate affiliates or service providers as necessary or appropriate to provide the product or service requested by the user; (ii) to the extent necessary or appropriate to comply with applicable laws or regulations, or if necessary to protect the rights, property or legal claims of J. J. Keller, its affiliated companies, or clients; or (iii) in the event of an actual or contemplated transaction where all or a portion of J. J. Keller or our assets are acquired by another company or divested.

## How Subject Information Is Stored and Destroyed

J. J. Keller takes reasonable steps to maintain the confidentiality and security of subject information obtained by and/or provided to us, including physical, electronic, and operational measures to protect subject information from loss, misuse, unauthorized access, disclosure, alteration and/or destruction. Our privacy initiatives and procedures include, but are not limited to:

- Limiting access to confidential subject information within J. J. Keller to those who have a need to know the information;
- Securing against unauthorized access to computer terminals, file cabinets, fax machines, trash bins, desktops;
- Maintaining a secure network to safeguard subject information from internal and external threat;
- Maintaining backup data in encrypted form;
- Maintaining access controls that prohibit those without business justification to view files or databases;
- Destroying subject information in accordance with the Federal Trade Commission's requirements that the information be rendered inaccessible, unreadable and/or unrecoverable upon disposal.

If you have any questions regarding this policy, you may contact us at:

Email: [webinfo@jjkeller.com](mailto:webinfo@jjkeller.com)

Last reviewed date: March 12, 2025