

## TRUORA, INC PRIVACY POLICY

**Effective Date:** June 2nd, 2018

This Privacy Policy (“Policy”) describes how Truora, Inc. (“Truora” or “we” or “our”) treats information collected or provided in connection with an end user’s (“you” or “user”) visit to or use of the website located at <https://new.truora.com> (“the platform”) and Tuora’s products and services (the “Services”). Please note that your use of the platform constitutes your acceptance of and consent to this Policy. When you sign up to use the Services, you also consent to receive electronic notices and disclosures.

Truora reserves the right to change this Policy at any time. Please check this page periodically for changes. Your continued use of the Services following the posting of changes to this Policy will mean you accept those changes.

This Policy seeks to answer questions you may have about the Services and Truora’s information practices. Please contact us if you have other questions.

1. What information does Truora collect through the Services?
2. How does Truora use the collected information?
3. When does Truora share information about you?
4. How does Truora protect your information?
5. Where is your information processed or stored?
6. How can you contact Truora with more questions?

### **1. What information does Truora collect through the Services?**

#### ***Information Provided Directly To Us***

We may collect information you provide directly through the Services. For example, we may collect your name, email address, or other contact information when you access certain Truora content available through the Services such as demos, videos, background checks, OCR tools, and other materials, or request additional information about Truora or the Services. Truora also collects information from you when you fill out any form in the Services such as when you submit questions or comments.

#### ***A. Clients***

If you want to use the Services to screen applicants (“Clients”), Truora may collect the following information (collectively, the “Client Information”), including, but not limited to:

- Account creation information, including your name, email address, and a custom password;
- Contact information such as address and phone number;
- Corporate and license information;
- If you are an employer, employer identification number; and
- Payment information, including credit card and/or bank account information and billing address.
  - Please note: We do not store the credit card or bank account numbers you may use to make payments in the Services. Such information is passed on to our third-party payment processor.

## *2. Applicants*

If you are an applicant who will be the subject of a screening or background check (“Applicants”), Truora may collect the following information (collectively, the “Background Check Information”), including, but not limited to:

- Account creation information, including your full name, e-mail address, and custom password;
- Contact information, including phone number and address;
- Identity verification information, including National ID Number (or foreign ID number or working permit number) and date of birth; and
- Additional information or supporting documentation you submit or upload regarding identity, background, evidence of rehabilitation, or a dispute.
  - Examples include an uploaded picture, a driver’s license, or court records.

### ***Automatically Collected Information***

When you visit or use the Services, we automatically gather certain technical and usage information, which may be associated with your user account. This

technical and usage information (“Technical Information”) includes usage information, such as information on when, how often and for how long you use the Services; and server log data such as a computer’s IP address, browser type, device type, operating system and version, or the webpage you were visiting before you came to the Services.

Technical Information also includes “Cookies,” which are small text files containing a string of alphanumeric characters that are downloaded by your web browser when you visit a website. Like many online services, we may use both session cookies and persistent cookies when you access and use the Services. Cookies are used to remember your user account information and your preferences, to customize the Services for you and to assist us in measuring and analyzing utilization of the Services.

## **2. How does Truora use the collected information?**

Truora uses the **information it maintains about you (including information you provide, Client Information, Background Check Information, and Technical Information)**:

- For the purposes for which you provided it;
- To create your account and enable you to use the Services;
- To verify your identity;
- To provide the features and functionality of the Services;
- For customer support and to respond to your inquiries;
- To respond to and fulfill your requests;
- With your consent, to contact you by text message regarding your account and certain services or information you have requested;
- To improve the Services;
- For internal record-keeping purposes and for legal purposes;
- To address fraud or safety concerns, or to investigate complaints or suspected fraud or wrongdoing; and
- To resolve disputes, to protect ourselves and other users, and to enforce any legal terms that govern your use of the Services.

Truora uses the **contact information** that you provide to access Truora content available in the Services or to obtain more information about Truora or its Services to provide such content and information. Truora may also use this information to provide you with additional information regarding products and services from Truora or our business partners that may be of interest to you. Truora does not use **Background Check Information** for this purpose.

Truora uses **Background Check Information** as reasonably necessary to:

- verify applicant identity;
- conduct background checks;
- conduct quality assurance checks;
- investigate disputes; or
- provide certain communications, including adverse action notices.

We may use **Client Information** to:

- contact you regarding your use of the Services;
- process billing and payment;
- send you product announcements and special promotions from Truora or our business partners, or to administer participation in special events, surveys, contests and sweepstakes; or
- send you communications regarding updates or modifications to the Services.

We may use **Client Information and Technical Information** to:

- personalize the content that you and others see based on personal characteristics or preferences;
- troubleshoot problems;
- provide you with required notices, in connection with disputes between you and another user; or
- alert you to changes in our policies or agreements that may affect your use of the Services.

Truora may also use **Technical Information** to analyze your use of the Services to help us improve the Services and develop and improve other products and services.

### 3. When does Truora share information about you?

We may share the information we collect from and maintain about you as follows:

- *Employers or Other Clients Requesting Background Reports.* We provide background reports, which may include Background Check Information, about Applicants to the requesting employer or Client. We may also provide an employer or Client other communications related to background reports such as notification of a dispute.
- *Service Providers.* We may provide access to your information to select third parties who perform services on our behalf. These third parties provide a variety of services to us, including without limitation conducting components of background checks, billing, fulfillment, data storage, analysis and processing, identity verification, fraud, accounting, auditing, and legal services.
- *Affiliates.* We may share information with our affiliates for use as described in this Policy.
- *Legal Requirements.* We will use and disclose information where we, in good faith, believe that the law or legal process (such as a court order, search warrant or subpoena) requires us to do so or in other circumstances where we believe is necessary to protect the rights or property of Truora, our users, or third parties.
- *De-identified information.* We may share de-identified information with third parties, including without limitation: (1) sharing aggregated, de-identified information about our user base and its interests and usage patterns and (2) providing de-identified information to third-party partners for our business arrangements, including without limitation to jointly offer a product or service to you or create interoperability between our products and services and theirs.
- *Consent.* We may disclose your information to nonaffiliated third parties based on your consent to do so.
- *Business Transfer.* In the event of a merger, sale of capital stock or assets, reorganization, consolidation or similar transaction involving Truora, or in contemplation of such a transaction (e.g., due diligence),

the information we possess may be transferred as a corporate asset to the acquiring entity.

- *Analytics.* We may use Google Analytics for purposes of analyzing usage of the Services.

Note that Truora will not provide your personally identifiable information to third parties for their own marketing purposes without your consent. All of our databases are encrypted, and confidentiality of personal data is guaranteed.

#### **4. How does Truora protect your information?**

Truora maintains safeguards to help protect the security of information we maintain about you. We may use encryption, passwords, and physical security measures to help protect your information against unauthorized access and disclosure. However, no security measures are 100% effective and we cannot guarantee your information will not be collected, disclosed and/or used by others. You should take steps to protect against unauthorized access to your password, phone, and computer by, among other things, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, keeping your log-in and password private, and not recycling passwords from other websites or accounts. Truora is not responsible for the unauthorized use of your information nor for any lost, stolen, or compromised passwords, or for any activity on your account via unauthorized password activity. **WE EXPRESSLY DISCLAIM ANY REPRESENTATION OR WARRANTY, WHETHER EXPRESS OR IMPLIED, WITH RESPECT TO ENSURING, GUARANTEEING, OR OTHERWISE OFFERING ANY DEFINITIVE PROMISE OF SECURITY IN CONNECTION WITH YOUR INFORMATION OR TECHNICAL INFORMATION.**

#### **5. Where is your information processed or stored?**

Truora uses servers located in the United States and Colombia. Truora may also use partners or affiliates located in other countries besides the US and Colombia to store and process your information. By using the Services, you consent to the transfer of information outside of your country, even if your country has more rigorous data protection standards.

#### **6.. How can I contact you with more questions?**

If you have any questions, concerns or complaints about this Policy or Truora's handling of your personal information, or if you would like to access or update personal information that is not available via the applicant portal, please contact us at

[contact@truora.com](mailto:contact@truora.com) or at:

Truora, Inc.  
Attn: Privacy Questions  
550 Battery Street  
San Francisco, CA

***Additional Information***

For further information regarding local laws and regulations in background checks, please contact our team.