

## PassFort Privacy Policy

### **Information about you is private and we will keep it that way.**

Please take a moment to read our Privacy and Cookie Policy below. Capitalised terms (and the terms 'you' and 'your') in this policy have the same meaning as in our [Terms and Conditions](#).

### **Our Privacy and Cookie Policy**

This Privacy and Cookie Policy has been created to demonstrate our commitment to protecting your personal information, and outlines how we collect, store, use and disclose your personal information. It does not apply to any other site or offline point of contact between the Company, or any other organisations, and consumers.

It also demonstrates how we disclose information to organisations you've agreed to give information and data to, as they relate to you and your prior and/or current employment. Please review this Privacy and Cookie Policy periodically as we may modify it from time to time. Each time you visit the Site or provide us with information, by doing so you are accepting the practices described in this Privacy and Cookie Policy at that time.

### **Jurisdiction**

PassFort works in compliance with all jurisdictions in which it operates.

PassFort is a UK company (Company Registration Number: 09565115). We are regulated by the Information Commissioner and are registered as data controllers on the Data Protection Register (number ZA126012.)

Data Protection laws in the EU and the UK stipulate that personal data must be fairly and lawfully processed, used only for the intended purpose, is adequate, relevant and not excessive, is accurate and up to date, is not kept longer than is necessary, is processed in line with the rights of the individual, is held securely, and is not transferred to other countries without adequate protection.

When the foregoing or other laws and regulations require that we observe privacy restrictions beyond those specifically stated in this Privacy and Cookie Policy, we undertake our activities in conformance with their requirements and, if the privacy restrictions conflict in any way with these provisions, we abide by the stricter requirements of the relevant laws, rules and regulations.

To provide you with our service, we may store, process and transmit information in locations around the world - including those outside your country or the EEA (this only applies if you have lived and worked overseas). Such a transfer will not occur without adequate protection. PassFort shall only process (including store) personal information in accordance with applicable European and UK privacy laws.

We do not participate in, or presently co-operate with, any kind of blanket surveillance or monitoring. However, we may disclose personal information when we determine that such disclosure is necessary to comply with applicable law.

The information commissioner's register of data controllers can be searched for our entry [here](#).

### **Data Security**

We take appropriate technical and organisational measures against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data. Please accept however, no security measures are perfect or impenetrable, and the Company cannot guarantee that the information submitted to, maintained on, or transmitted from its systems will be completely secure. The Company is not responsible for the circumvention of any privacy settings or security measures contained on the Site by any Users or third parties.

We employ state of the art firewall technology, and all data generated in PassFort is fully encrypted at rest and in transit using 256-bit SSL encryption, and continuously backed up in several high security data centres in different locations.

### **Your Information**

In order to operate the Services and Site, we collect "personal information" (i.e. information that could be used to contact you directly (without using the Site) such as full name, postal address, phone number or email address. We collect the personal information that we need in order to effect background checks on people. We only collect and use the information we need. The information that we collect about people who are background checked by PassFort depends on what background check is selected (e.g criminal record, right to work in the UK).

We may also collect "demographic information" (i.e. information that you submit, or that we collect, including, but not limited to, postal code, gender, username, age/birth date, browsing history information, registration history information, subject to the rest of this paragraph). Please note that nowhere on the Site do we knowingly collect personal information from children under the age of 16, as we require that all users represent to us that they are at least 16 years old.

For further information on the Data Protection Act and its Code of Conduct, please contact the Information Commissioner's Office ([www.ico.org.uk](http://www.ico.org.uk)).

### **Special Cases In Which We Share Personal Information**

We will only share information with other organisations where we have your permission to do so in accordance with this Privacy and Cookie Policy or where we believe it is necessary for a legitimate reason connected with the Site or our Services.

Your personal information may be passed on to a third party in the event of a transfer of ownership or assets, or a bankruptcy. We may also disclose personal information when we determine that such disclosure is necessary to comply with applicable law, to cooperate with law enforcement or to protect the interests or safety of the Company or other organisations using the site. Whenever personal information is disclosed under this paragraph, we may also disclose your demographic information along with it, on a non-anonymous basis. We do not sell any personal information to third parties. The data that

we collect and do make available to you and organisations that request background information from you, is solely presented in aggregated. All pages containing information are protected by SSL.

### **How We Use Public Information and Other Demographic Information**

We may review all demographic information. We may use all the information provided to us by you or any third party for benchmarking. We may use demographic information to tailor the Site and communications to your interests. We may also share demographic information with advertisers on an anonymous and aggregated basis (i.e. without telling the advertisers your identity).

We may combine your data with those of other users of our Site and Services and share or provide this information in aggregated and anonymised form with third parties. We may also use information collected from you and combine it with information provided by other users of our Site and Services to help us improve the design and delivery of our software tools, increasing the effectiveness for all users.

### **Your IP Address**

Due to the communications standards on the Internet, we automatically receive the uniform resource locator (“URL”) of the website from which you came and the website to which you proceed once you leave the Site. We also receive the IP address of your computer (or the proxy server you use to access the World Wide Web), your computer operating system and type of web browser you are using, as well as the name of your Internet service provider (“ISP”). This information is used to analyse overall trends to help us improve the Site.

### **Cookies**

Like most Sites, the Site uses cookies to keep track of your activity on the Site and enhance your experience on the Site. A cookie is a small text file that’s stored on your computer or mobile device when you visit a website. We also use cookies to save your login email, and if you choose, to save other personal information so you do not have to re-enter it each time you visit the Site.

In order to access or change any of your private information, you must log in with your password even if your computer contains your persistent cookie. Additionally, if you log out of the Site you will need to re-enter your password the next time you visit in order to log in to your account. Another type of cookie, called a “session” cookie, is used to identify a particular visit to the Site. Session cookies expire after a short time or when you close your web browser.

Third party advertisers on the Site may also place or read cookies on your browser. If you wish to disable these cookies, the "help" portion of the toolbar on most browsers will tell you how. However, if you set your browser to disable cookies, you may not be able to access certain areas on the Site.

### **Changing Our Privacy and Cookie Policy for Previously Gathered Information**

If at any point we decide to use particular personal information in a manner different from that stated at the time it was collected, we will notify users by way of an email or by providing 30 days' notice on the Site. Please note that we will continue to have the right to change our Privacy and Cookie Policy and practices, and how we use your personal information, without notice, as described in the first paragraph of this Privacy and Cookie Policy, provided that such changes shall only apply to information gathered on or after the date of the change.

### **How You Can Access and Update Your Email Preferences, Personal Information and Public Information**

The law gives you the right to request a copy of the personal information we hold about you. We require you to prove your identity with 2 pieces of approved identification. We will supply, correct or delete personal information about you on our files. In addition, you may at any time request rectification or erasure of personal information as well as the restriction of processing of your personal information by emailing us at [info@passfort.com](mailto:info@passfort.com).

We give you the opportunity to opt-out of certain communications and modify some personal information or demographic information you have provided to us. When you sign up for our updates or receive e-mail messages from us, you will always be given the chance to opt-out of special offers and Site updates. You may change your preferences at any time and will only be contacted in manners consistent with your stated preferences. Please be aware that it may take several hours for the changes you make to take effect. We thank you for your patience. Please note that opting-out of receipt of email communications from PassFort will only change or delete the data in our database for purposes of future activities on the Site and for managing future communications from PassFort.

If you have any questions or concerns about this Privacy and Cookie Policy, the practices of the Site, or your dealings with the Site, please contact us first by emailing [info@passfort.com](mailto:info@passfort.com). We take privacy very seriously and we do want to hear from you. If we do not satisfactorily deal with your complaint, then you may contact the Information Commissioner.