# **Privacy Policy**

At Global Investigative Services ("GIS"), protecting the confidentiality and privacy of information you share with us is a fundamental part of our work.

This Privacy Policy explains how and why we collect, use, and share information, including personal information, when you visit this website.

We do not sell personal information. We collect, use, and share personal information from this website solely to support the marketing of our services, and for other operational and administrative purposes. GIS is a business-to-business provider of services. Our services are not marketed to, or intended for, consumers.

# INFORMATION WE COLLECT

When you visit our website, we collect information from your browser about the pages you visit.

When you fill out a form on our website, we collect personal information about you (e.g., name, email address, phone number, and any other information you provide in our form's text field), which you voluntarily provide in order to receive information or other services from GIS. Keep in mind that our website form will collect whatever data you write into our form's text field; we therefore recommend that you not include sensitive personal information when you write to us.

When you email personnel at GIS, we collect your email contact information, which may be stored in our customer relationship system, which keeps track of the personnel with whom you are communicating, and the services in which you have expressed interest.

When you provide employment information through our "Careers" link in our website, we collect the information indicated in that form that you may provide, including first and last name, email and physical address, phone number, whether you are over 18, immigration status, criminal conviction information, employment history, educational background, personal reference information, and any information you may provide in any resume you send us and/or type into any form field. The Careers link also gives applicants the option to voluntarily identify their gender, ethnicity/race, veteran status, and any disability.

We do not knowingly collect information via this website for anyone under the age of 18, nor do we market our services to them. If you are under eighteen (18), you should not provide any personal information to us.

## WHERE WE GET PERSONAL INFORMATION

**Directly from you**, such as when you fill out an online form or communicate directly with our personnel

Indirectly from you, when you browse our website

## **HOW WE USE PERSONAL INFORMATION**

GIS may use and/or disclose your personal information it collects from this website for marketing, operational, and administrative uses. These uses may vary depending on the nature of our relationship with you, but may include:

- To provide you with the information that you have requested
- To communicate with you about products and services
- To operate, troubleshoot, analyze and improve our website and digital services
- As reasonably necessary and appropriate, to detect or prevent fraud, to comply with legal obligations, or protect yours, ours, or others' rights
- To fulfill other purposes permitted or required by law
- To evaluate you for employment, if you have sought employment through the "Careers" link in our website
- For other uses disclosed to you, with your consent

## WHEN WE SHARE PERSONAL INFORMATION

We share information with third parties when necessary to market our services, when we have your consent, or when required by law.

GIS may share personal information with its affiliates and subsidiaries for the purposes set out in this policy. However, under no circumstances does GIS sell, trade, barter, or exchange the information.

Where applicable, we may disclose your personal information to third parties involved in the marketing operations and administration of GIS. When required, we obtain written contractual assurances from these third parties that their privacy and security practices are in accord with applicable legal requirements. We also may disclose your personal information to third parties where we sell or merge any or all of our business and/or our assets to a third party, or where we are legally required to disclose your information.

GIS uses third-party service providers to support our marketing program. With all website visitors, even those who do not complete any forms or otherwise seek our services, certain information is automatically collected through the use of third-party

service Google Analytics and similar technologies. This information helps us administer, protect, and improve our services; analyze usage; and improve users' experience.

Through Google Analytics, the website collects online identifiers, including cookie identifiers, IP addresses and device identifiers. Google Analytics collects information and reports website usage statistics. To opt out of being tracked by Google Analytics, visit the Google Analytics Opt-Out Browser Add-on.

The website also uses cookies, which are small files placed on the hard drive of your computer, to improve the operation and functionality of the website. The cookies we use may include:

- Process Cookies that enable the website to function properly and assist in navigating pages and accessing services. Without these cookies, the website may not function properly.
- Session State Cookies that collect information about how users interact with a
  website. This may include the page users visit most often and whether users get
  error messages from certain pages. These cookies help improve users' browsing
  experience, but blocking or deleting these cookies will not render the website
  unusable.

Unless you have adjusted your browser settings so that it will refuse cookies, our system will issue cookies when you direct your browser to our website. By using our website, you consent to our use of cookies and the placement of cookies on your device for the purposes described. Our website does not respond to "do not track" or similar signals.

## **CALIFORNIA PRIVACY RIGHTS**

If you are a California resident, please review our California Privacy Notice.

## **DATA SECURITY**

GIS secures data through a mix of technical and administrative safeguards that are audited annually by third-party information security experts. GIS also has policies and procedures designed to promote commercially reasonable security practices in accord with US and international requirements. Nonetheless, the transmission of information via the Internet is not completely secure and we cannot guarantee the security of data sent to us electronically over cellular and wireless networks that we do not control.

#### CHANGES TO THIS PRIVACY POLICY

This privacy policy was last updated on June 21<sup>st</sup>, 2021. If we make any material changes in the way we collect, use, and/or share the personal information that you have

provided, we will notify you by posting a notice of the changes in a conspicuous manner on this website.

# **CONTACT INFORMATION**

If you have any questions or comments about this policy, the ways in which GIS collects and uses your information, your choices and rights regarding such use, please do not hesitate to contact us at:

Phone: 1-833-402-8661

Email: compliance@primeritus.com

**Postal Address:** 

435 Metroplex Dr., Nashville, TN 37211

Attn: Compliance

# **California Privacy Notice**

This **California Privacy Notice** supplements the information contained in GIS's Privacy Policy and applies solely to website visitors who reside in California ("consumers" or "you").

# **INFORMATION WE COLLECT**

The chart below provides additional information about the information we collect on our website, the reason we collect it, and with whom it may be shared, e.g., the categories of third parties with whom the information may be shared. The chart further notes whether that information has been collected on our website or disclosed in the past 12 months.

Category of Personal Information	Reason for Collecting and/or Sharing	Categories of Third Parties	Collected or Disclosed in past 12 months
Common identifiers, e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	We collect name, email address, phone numbers, and online identifier information for marketing and administrative purposes information security; website management; to comply with applicable legal requirements; to respond to claims or complaints; to evaluate candidates for employment; and potentially to defend or prosecute legal claims.	Information technology and security providers; service providers; third parties when permitted by law; and our affiliates.	Collected and disclosed
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)). This includes: A name, signature, Social Security number, physical characteristics or	We collect name, email address, phone numbers, and online identifier information for marketing and administrative purposes information security; website management; to comply with applicable legal requirements; to respond to claims or complaints; to respond to claims or complaints; to evaluate candidates for	Information technology and security providers; service providers; third parties when permitted by law; and our affiliates.	Collected and disclosed

description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.  Some personal information included in this category may overlap with other categories.	employment; and potentially to process, defend or prosecute legal claims.		
Protected classification characteristics under California or federal law. This includes: Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	We do not collect this information on our website, except if a job applicant voluntarily provides it when completing the optional portion of form in the "Careers" portion of our website. The information is used in connection with our evaluation of candidates for potential employment.	Service providers; third parties when permitted by law; and our affiliates.	Collected and disclosed.
Commercial information. This includes: Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	We collect this information on our website only to the extent that our website users voluntarily type this information (for example, information about any repossessed vehicles) into the text box of our online form. Our website does not specifically seek to collect this information.	Service providers; third parties when permitted by law; and our affiliates.	Collected and disclosed
Biometric information. Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and	We do not collect this information on our website.	Not applicable	Not applicable

sleep, health, or exercise data.			
Internet or other similar network activity. Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	We collect online identifier information for marketing and administrative purposes.	Web-hosting and marketing support vendors	Collected and disclosed
Geolocation data. Physical location or movements.	We do not collect this information on our website.	Not applicable	Not applicable
Sensory data. Audio, electronic, visual, thermal, olfactory, or similar information.	We do not collect this information on our website.	Not applicable	Not applicable
Professional or employment-related information. Current or past job history or performance evaluations.	We collect this information on our website if a job applicant voluntarily provides it when completing the form in the "Careers" portion of our website. The information is used in connection with our evaluation of candidates for potential employment.	Service providers; third parties when permitted by law; and our affiliates.	Collected and disclosed.
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)). Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	We do not collect this information on our website.	Not applicable	Not applicable
Inferences drawn from other personal information. Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	We do not collect this information on our website.	Not applicable	Not applicable

# **CHOICES ABOUT YOUR DATA**

Website visitors can take steps to limit the amount of personal information collected about you. As noted above, website visitors can use various tools to limit the amount of information shared with GIS and the third-party vendors it uses to support its website.

Website visitors may ask for information about the information collected about them on this website. If you have provided personal information to GIS on this website, you can request:

- To know the categories of personal information we have collected about you, the reason(s) we have collected it, the sources of the data, and the categories of third parties with whom we share the information;
- To know the specific pieces of information we have collected about you (in addition to the information described above).

If you have only provided personal information as a result of browsing our website, i.e., you did not complete any forms or send GIS any emails or other communications, GIS may be unable to provide information about any specific personal data it holds about you, as we may not have any. Please refer to the table above for information about GIS's general data handling practices.

You may also request that GIS delete the personal information it holds about you. Please keep in mind, however, requests to delete data are subject to various limitations by statute and GIS may retain certain data as permitted by law.

# Data requests can be made in the following ways:

- by writing us at the following address: 435 Metroplex Dr., Nashville, TN 37211;
- by calling the toll-free Data Request number 1-833-402-8661; or
- by emailing compliance@primeritus.com

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or the requestor's authority to make the request. An authorized agent may request information on your behalf if they provide evidence of their legal authority to submit such requests.

Questions about the data request process should be directed to <a href="mailto:compliance@primeritus.com">compliance@primeritus.com</a> or **1-833-402-8661**. Note that the rights described above may not apply to information you may have submitted in connection with seeking or maintaining employment at GIS.

**Verifying your identity** is required before we respond to your request. To verify your identity, we will collect basic personal information about you to match with our records. Next, you will receive an email confirmation that your request was received, as well as information about additional steps that may be required to confirm your identity and verify appropriate contact information. You may make data requests no more than twice in a 12-month period.

We will try to respond to verifiable requests within 45 days. If we require more time, we will inform you of the reason and extension period in a written response. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

We will not discriminate against you for exercising any of your rights under California law.