

European Union Safe Harbor Policy

Accurate Background, Inc. ("the company," "we," "us," or "our") respects individual Privacy and values the confidence of our customers, employees, consumers, business partners, and others. Accurate Background adheres to the Safe Harbor Agreement concerning the transfer of personal data from the European Union or 'Commonwealth' to the United States of America. Accordingly, we follow the Safe Harbor Principles published by the U.S. Department of Commerce ("Principles") with respect to all such data. This statement outlines our general policy and practices for implementing the Principles, including the types of information the company gathers, how we use it, and the choices affected individuals have regarding our use of, and their ability to correct, that information.

This statement applies to all personal information we handle, including on-line (except as noted below), off-line, and manually processed data. For purposes of this statement, "personal information" means information that:

- is transferred from the European Union to the United States;
- is recorded in any form;
- is about, or pertains to, a specific individual or can be linked to that individual.

Principles Protecting Individuals' Privacy

Notice and Choice

To the extent permitted by the Safe Harbor Agreement, we reserve the right to process personal information in the course of our internal business operation without the knowledge of individuals involved.

Where the company receives personal information from its subsidiaries, affiliates, or other entities in the EU, the company will use and disclose such information in accordance with the purposes for which it was originally collected, or in accordance with the notices provided by such entities.

The company will provide notice and provide individuals with an opportunity to "opt out" if such personal information is to be disclosed to a third party or used for a purpose incompatible with the purpose for which it was originally collected. For sensitive information, affirmative or explicit, the company will provide notice and individual choice will be given to "opt-in" if such sensitive information is to be disclosed to a third party or used for a purpose other than the purpose for which it was originally collected.

We collect personal information from individuals only as permitted by the Principles or with the consent of the individual affected. Consent for personal information to be collected, used, and/or disclosed in certain ways may be required in order for an individual to obtain or use our services.

Disclosures and Transfers

We do not disclose an individual's personal information to third parties, except when one or more of the following conditions is true:

- We have the individual's permission to make the disclosure;
- The disclosure is required by law or mandatory professional standards;
- The disclosure is reasonably related to the sale or other disposition of all or part of our business;
- The information in question is publicly available;
- The disclosure is reasonably necessary for the establishment of legal claims; or
- The disclosure is to another Accurate Background entity or to persons or entities providing services on our or the individual's behalf (each a "transferee"), consistent with the purpose for which the information was obtained, if the transferee, with respect to the information in question:
 - is subject to law providing an adequate level of privacy protection;
 - has agreed in writing to provide an adequate level of privacy protection; or
 - subscribes to the Principles.

Permitted transfers of information, either to third parties or within Accurate Background, or between subsidiaries of Accurate Background, include the transfer of data from one jurisdiction to another, including transfers to and from the United States of America. Because privacy laws vary from one jurisdiction to another, personal information may be transferred to a jurisdiction where the laws provide less or different protection than the jurisdiction in which the information originated.

Data Security, Integrity and Access

We employ various physical, electronic, and managerial measures, designed to provide personal information with reasonable protection from accidental loss or destruction, improper use, alteration, or disclosure. However, we cannot guarantee the security of information on or transmitted via the Internet.

We process personal information only in ways compatible with the purpose for which it was collected or authorized by the individual. To the extent necessary for such purposes, we take reasonable steps to make sure that personal information is accurate, complete, current, and otherwise reliable with regard to its intended use.

If an individual becomes aware that information we maintain about that individual is inaccurate, or if an individual would like to update or review his or her information, the individual may contact us using the contact information below. The individual will need to provide sufficient identifying information. We may request additional identifying information as a security precaution. In addition, we may limit or deny access to personal information where providing such access would be unreasonably burdensome or expensive in the circumstances, or as otherwise permitted by the Safe Harbor Agreement. In some circumstances, we may charge a reasonable fee, where warranted, for access to personal information.

Information Subject to Other Policies

We are committed to following the Principles for all personal information within the scope of the Safe Harbor Agreement. However, certain information is subject to policies of the firm that may differ in some respects from the general policies set forth in this statement.

- Links from our external website and our intranet have their own privacy policies that apply to those websites. These policies may be accessed through the websites in question.
- Information obtained from or relating to clients or former clients is further subject to the terms of any confidentiality or privacy notice to the client, any engagement letter or service agreements executed with the client, and applicable laws and professional consulting standards.

Changes to this Privacy Policy

Accurate Background Inc. reserves the right to change this Privacy Policy from time to time and will post any revisions on this web site. When we do so we will also revise the "last updated" date at the end of this Privacy Policy.

Amendments

This policy may be amended from time to time, consistent with the requirements of the Safe Harbor Principles. If we amend this policy, a revised policy will be posted on our Web site.

How to Contact Us

Should you have any questions or suggestions about our privacy practices, or wish to update or correct any personally identifiable information that you have chosen to provide to us, please feel free to contact us at:

Accurate Background, Inc.

6 Orchard, Suite 200

Lake Forest, CA 92630

800.784.3911

customer_service@accuratebackground.com

Effective Date: March 1, 2007