

SPRINGROLE, INC.

PRIVACY POLICY

Last Updated: 19th February 2020

1. INTRODUCTION

SpringRole, Inc. (“SpringRole” “we,” “us,” or “our”) respects the privacy of its Users (“User,” “your,” or “you”). This Privacy Policy (the “Policy”) explains how we collect, use, disclose, and safeguard your information when you use our “Website,” “Platform,” and/or “Services.”

SpringRole is committed to protecting the privacy of its Users whose information is collected and stored using SpringRole’s Website and SpringVerify (our “Platform” or “SpringVerify”) for conducting employment related background check services (“Services”).

The capitalized terms have the same meaning as ascribed in the Terms of Service, unless otherwise noted here.

PLEASE READ THIS POLICY CAREFULLY TO UNDERSTAND OUR POLICIES AND PRACTICES REGARDING YOUR INFORMATION AND HOW WE WILL TREAT IT. BY ACCESSING OR USING OUR WEBSITE, AND PLATFORM YOU AGREE TO ACCEPT ALL THE TERMS CONTAINED IN THIS POLICY AND ACKNOWLEDGE AND AGREE WITH THE PRACTICES DESCRIBED HEREIN. IF YOU DO NOT AGREE WITH THE TERMS OF THIS POLICY, PLEASE DO NOT ACCESS AND USE OUR WEBSITE, PLATFORM, OR SERVICES.

WE DO NOT SELL YOUR PERSONAL INFORMATION, NOR DO WE INTEND TO DO SO. WE DO NOT GIVE ACCESS TO YOUR PERSONAL INFORMATION TO THIRD PARTIES EXCEPT TO SUBCONTRACTORS TO ASSIST US IN THE PROVISION OF OUR SERVICES TO YOU.

IF YOU HAVE ANY QUESTIONS REGARDING THIS PRIVACY POLICY, PLEASE SEND US AN EMAIL AT privacy@springrole.com.

1. WHAT INFORMATION DO WE COLLECT?

When you register and use our Platform and/or Services, we collect both personally identifiable information (“PII”), which may include your full name, contact information, address, phone number, email address or email address with a password, security question and answer, driver’s license, date of birth, social security number, passport number, photographs, photograph, video or audio file containing an image or voice, and IP address of your device or processor identifier etc. The information so collected will be stored on our servers located in USA. We collect the following information when you opt for our services on our Website, Platform, or use our Services:

- a. Account Information. When you register to use our Platform or when you create an account on our Website, we will collect your PII.

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- b. Financial Information. We do not collect credit card information as we use a third-party payment processor who will collect this information on our behalf.
- c. Educational, Professional, and Employment Information. We collect your educational, professional, and employment information such as your employer, business title, business address, degrees, schools, universities attended etc.

2. HOW DO WE COLLECT INFORMATION?

We collect information from our Users in the following ways:

- a. upon registration on our Platform
- b. upon signing up on our Website
- c. through email, text, and other electronic messages between User and the Website
- d. while placing an order including details of transactions an individual carries out on our Platform
- e. subscription to a newsletter
- f. individual's responses to a survey
- g. answers to a form
- h. records and copies of correspondence (including email addresses) if a User contacts the company
- i. through third-party business partner

We collect the following information from an individual automatically when the User navigates through our Platform and/or our Website

- a. Usage details
- b. IP addresses
- c. Web beacons on emails sent by the User

3. HOW DO WE USE YOUR INFORMATION?

We use the information that you provide to:

- a. Personalize User experience in using our Platform, Website and/or Services
- b. Provide Users with information, products, or services requested from us
- c. Present our Website and its contents to Users
- d. Provide Users with notices about account/subscription, including expiration and renewal notices
- e. Carry out obligations and enforce rights arising from contracts entered into between Users and company, including for billing and collection
- f. Notify users about changes to our Website, Platform or the Services
- g. Allow Users to participate in interactive features of our Website;
- h. Improve our Website
- i. Improve customer service
- j. Administer contests, promotions, or a survey or other site feature
- k. Process a transaction
- l. Send you periodic emails to send information, respond to inquiries, and/or other requests or questions, process orders and to send information and updates pertaining to orders, offering our additional Services and other special offers and promotions that we think you will be interested

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- in. If at any time you wish to opt out of email marketing, please follow the instructions on the bottom of our emails or contact us at privacy@springrole.com;
- m. Anonymize and aggregate data using statistics for marketing purposes which will be shared with the public relations team;
- n. Contact Users about our products and services that may be of interest; and
- o. Enable the display of advertisements to our advertisers' target audiences; although personal information is not shared without User's consent.

4. HOW DO WE PROTECT INFORMATION WE COLLECT?

Our Website and Platform are reasonably scanned to meet or exceed PCI Compliance. Our Website and Platform receive regular security scans and penetration tests. Our Website and Platform also receive regular malware scans. In addition, our Website uses an SSL certificate as an added security measure. We require username and passwords for our employees who can access the PII of Users that we store and/or process on our Platform and servers. In addition, we actively prevent third parties from getting access to the PII of Users that we store and/or process on our Platform and servers. We accept payment by credit card through a third-party credit card processor on our behalf. We will implement reasonable security measures every time you (a) place an order, or (b) enter, submit, or access your information, (c) register, or (d) access our Platform and on our Website.

5. HOW CAN YOUR INFORMATION BE DISCLOSED?

SpringRole being a consumer reporting agency provides, or otherwise transfers personally identifiable information: (i) as provided in this Policy, (ii) to subcontractors, service providers, or third parties under contractual obligations to keep the PII confidential and use it only for the purposes for which it was disclosed (iii) to fulfill the purpose for which the user provided it so as to verify the information you provide us against authoritative government databases or information providers (iv) in the event of a merger, sale of business etc. (v) to defend against legal claims or otherwise protect our rights, (vi) as required by law, judicial proceeding, court order, or legal process served on us, (vii) for purposes of law enforcement investigations, (viii) to protect rights, property, or safety of the company, our customers, or others and this includes exchanging information with other companies and organizations for the purposes of fraud prevention (ix) to enforce or apply our Terms of Service (x) with your consent and/or (xi) to collect public records and other information from reliable third-party sources to assemble the report.

YOU HEREBY CONSENT TO US SHARING YOUR PII WITH OUR SUBCONTRACTORS WHO DO THE BACKGROUND CHECKS DISCUSSED IN OUR TERMS OF SERVICE.

6. CHOICES USERS HAVE ABOUT HOW SPRINGROLE USES AND DISCLOSES INFORMATION.

- a. Tracking Technologies and Advertising. Users can set their browser to refuse some or all the browser cookies, but if the Users disable or refuse cookies, User login will be disabled to our Website and Platform.
- b. Disclosure of Users' Information for Third-Party Advertising. Users can opt-out by (i) logging into our Platform and adjusting their preferences in their account profile by checking or unchecking the relevant boxes, or (ii) emailing us their opt-out request at support@springrole.com.

- c. Disclosure of User's Information for Targeted Advertising. Users can opt-out by (i) logging into our Platform and adjusting their preferences in their account profile by checking or unchecking the relevant boxes, or (ii) emailing us their opt-out request at support@springrole.com.

7. **GOOGLE ADSENSE AND GOOGLE ANALYTICS**

Google, as a third-party vendor, uses cookies to serve advertisements to Users on our Platform. We currently use Google Analytics to collect and process certain Website usage data. We have implemented advertising features on our Platform including: (a) remarketing with Google AdSense; (b) Google Display Network Impression Reporting; and (c) Google Demographics and Interests Reporting. (d) Google's DoubleClick platform integration. Google uses first-party cookies, such as Google Analytics cookies, to compile data regarding User interactions with ad impressions and other ad service functions as they relate to our Platform. The information collected in this manner may include IP address, browser characteristics, device IDs and characteristics, operating system version, language preferences, referring URLs, and information about the usage of Website, Platform and/or Services. To learn more about Google Analytics and how to opt-out, please visit <https://policies.google.com/privacy/google-partners>.

8. **OUR COOKIE POLICY**

Cookies are small pieces of text used to store information on web browsers. Cookies are used to store and receive identifiers and other information on computers, phones, and other devices. Other technologies, including data we store on your web browser or device, identifiers associated with your device, and other software, are used for similar purposes. In this Policy, we refer to all of these technologies as "Cookies."

We use Cookies on our Website. We use Cookies to understand and save User's preferences for future visits; to track the advertisements; compile aggregate data about site traffic and interactions in order to offer better site experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf and our Website may have links to third-party websites. If you do not want your information to be disclosed for targeted advertising, you can opt-out by logging into our Website and adjusting your preferences in your account profile by checking or unchecking the relevant boxes but, to opt-out, a User browser must accept cookies. You can set your browser to refuse all or some browser Cookies but, that will disable your login. We honor do not track signals and, when a do not track browser mechanism is in place, we will not track, plant cookies, or use advertising.

9. **COPPA COMPLIANCE (FOR CHILDREN UNDER 13 USERS ONLY)**

The Children's Online Privacy Protection Act ("COPPA") is a legislation that applies to entities that collect and store personal information from children under the age of 13. SpringRole is committed to ensure compliance with COPPA. If you would like to know more about our practices and specifically our practices in relation to COPPA compliance, please email us at privacy@springrole.com. But please note that (i) our Services are not available to children under the age of 13, (ii) we do not market our services to children under the age of 13 and (iii) we do not knowingly sell our services to children under the age of 13.

10. **NOTICE FOR PARENTS (FOR CHILDREN UNDER 13 USERS ONLY)**

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Our Platform is designed for background verification and employment screening. While adults can use our Platform directly, a child under the age of 13 cannot make use of our Platform and Services.

11. YOUR CALIFORNIA PRIVACY RIGHTS

SpringRole does not sell, trade, or otherwise transfer to outside third parties your “Personal Information” as the term is defined under the California Civil Code Section § 1798.83. Additionally, California Civil Code Section § 1798.83 permits Users of Website, Platform and/or Services that are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please send an email to support@springrole.com or write to us at SpringRole, Inc. - 1447, 2nd St, suite 200, Santa Monica CA 90401.

12. CAN-SPAM ACT OF 2003

The CAN-SPAM Act establishes requirements for commercial messages, gives recipients the right to have businesses stop emailing them, and spells out penalties for violations. Per the CAN-SPAM Act, we will:

- a. not use false or misleading subjects or email addresses;
- b. identify the email message as an advertisement in some reasonable way;
- c. include the physical address of SpringRole which is 1447, 2nd St, suite 200, Santa Monica CA 90401
- d. monitor third-party email marketing services for compliance, if one is used;
- e. honor opt-out/unsubscribe requests quickly; and
- f. give an “opt-out” or “unsubscribe” option.

If you wish to opt out of email marketing, follow the instructions at the bottom of each email or contact us at privacy@springrole.com and we will promptly remove you from all future marketing correspondences.

13. ACCESS, UPDATE AND DELETION OF USER INFORMATION

If you want us to identify the PII that we store on you, please send an e-mail to support@springrole.com or write to us at SpringRole, Inc. - 1447, 2nd St, suite 200, Santa Monica CA 90401. You can change your PII on our systems by making changes on your account settings or by chatting with us or by raising a ticket on our Platform. If you want us to delete all of the PII in all of our systems that we store on you, please send an e-mail to support@springrole.com or write us at SpringRole, Inc. - 1447, 2nd St, suite 200, Santa Monica CA 90401. Note that (i) if we delete your PII as requested, we will no longer be able to provide our Services to you and (ii) we may need to keep such PII for a while during the shutting down and billing process. If you would like to discuss our PII storage and processing process with us, please send an e-mail support@springrole.com or write us at SpringRole, Inc. - 1447, 2nd St, suite 200, Santa Monica CA 90401.

14. SUMMARY OF YOUR RIGHTS UNDER THE FAIR CREDIT REPORTING ACT

- i. **You must be told if information in your file has been used against you.** Anyone who uses a credit report or another type of consumer report to deny your application for credit, insurance, or employment – or to take another adverse action against you – must tell you, and must give you the name, address, and phone number of the agency that provided the information.

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- ii. **You have the right to know what is in your file.** You may request and obtain all the information about you in the files of a consumer reporting agency (your “file disclosure”). You will be required to provide proper identification, which may include your Social Security number. In many cases, the disclosure will be free. You are entitled to a free file disclosure if:
 - a. a person has taken adverse action against you because of information in your credit report;
 - b. you are the victim of identity theft and place a fraud alert in your file;
 - c. your file contains inaccurate information as a result of fraud;
 - d. you are on public assistance;
 - e. you are unemployed but expect to apply for employment within 60 days.

In addition, all consumers are entitled to one free disclosure every 12 months upon request from each nationwide credit bureau and from nationwide specialty consumer reporting agencies.

- iii. **You have the right to dispute incomplete or inaccurate information.** If you identify information in your file that is incomplete or inaccurate and report it to the consumer reporting agency, the agency must investigate unless your dispute is frivolous.
- iv. **Consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information.** Inaccurate, incomplete, or unverifiable information must be removed or corrected, usually within 30 days. However, a consumer reporting agency may continue to report information it has verified as accurate.
- v. **Consumer reporting agencies may not report outdated negative information.** In most cases, a consumer reporting agency may not report negative information that is more than seven years old or bankruptcies that are more than 10 years old.
- vi. **Access to your file is limited.** A consumer reporting agency may provide information about you only to people with a valid need – usually to consider an application with a creditor, insurer, employer, landlord, or other business. The FCRA specifies those with a valid need for access.
- vii. **You must give your consent for reports to be provided to employers.** A consumer reporting agency may not give out information about you to your employer, or a potential employer, without your written consent given to the employer. Written consent generally is not required in the trucking industry.
- viii. **You may limit “prescreened” offers of credit and insurance you get based on information in your credit report.** Unsolicited “prescreened” offers for credit and insurance must include a toll-free phone number you can call if you choose to remove your name and address from the lists these offers are based on. You may opt-out with the nationwide credit bureaus at 1-888-5-OPTOUT (1-888-567-8688).

The following FCRA right applies with respect to nationwide consumer reporting agencies:

- ix. **Consumers Have the Right to Obtain a Security Freeze**

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You have a right to place a “security freeze” on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a security freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit.

As an alternative to a security freeze, you have the right to place an initial or extended fraud alert on your credit file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer’s credit file. Upon seeing a fraud alert display on a consumer’s credit file, a business is required to take steps to verify the consumer’s identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting 7 years.

A security freeze does not apply to a person or entity, or its affiliates, or collection agencies acting on behalf of the person or entity, with which you have an existing account that requests information in your credit report for the purposes of reviewing or collecting the account. Reviewing the account includes activities related to account maintenance, monitoring, credit line increases, and account upgrades and enhancements.

- x. **You may seek damages from violators.** If a consumer reporting agency, or, in some cases, a user of consumer reports or a furnisher of information to a consumer reporting agency violates the FCRA, you may be able to sue in state or federal court.

15. DATA SECURITY MEASURES.

- a. Security Measures. We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Platform, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website or Platform. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on our Website or Platform.
- b. Fair Information Practice Principles. In the event of a personal data breach, we will notify the User within 72 hours of the breach by putting up a notification on our Website and/or Platform and within 5 business days via email. We agree to the individual redress principle, which requires that individuals have a right to pursue legally enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users, but also that that individuals have recourse to courts or a government agency to investigate and/or prosecute non-compliance by data processors.

16. TERRITORIAL RESTRICTION

SPRINGROLE, INC.

Our Website and Platform is only available for access and use in the United States (“U.S.”).

Please do not access or use our Website, Platform, and Services if you reside outside the U.S. Please be aware that information you provide to SpringRole while accessing/using our Website, Platform, or Services may be processed and transferred to the U.S. and be subject to applicable U.S. laws. The privacy and data protection laws in the U.S. may not be equivalent to such laws in your country of residence.

OUR WEBSITE, PLATFORM, AND/OR SERVICES ARE NOT AVAILABLE FOR USE AND DOWNLOAD IN THE EUROPEAN UNION.

Please do not register for our Services if you live anywhere in the European Union. If we discover any unauthorized registration on our Website and/or Platform, we reserve the right to terminate the registration. By using our Website, Platform, and/or Services, or by providing SpringRole with your information (as detailed under this Privacy Policy), you consent to this collection, transfer, storage, and processing of information to and in the U.S.

If you have any questions regarding this section, please email us at privacy@springrole.com.

17. DISCLAIMER

SpringRole may review, verify, or otherwise approve any content created by third-party service providers via our Website, Platform, and/or Services. Under no circumstances will SpringRole be liable in any way for any content created by third-party subcontractors and/or service providers for, including, but not limited to, any errors or omissions in any content, or any loss or damage of any kind incurred as a result of the use of any such content.

18. MODIFICATIONS TO OUR PRIVACY POLICY

SpringRole reserves the right, at its sole discretion, to change or modify this Policy at any time. In the event, we modify this Policy, such modifications shall be binding on you only upon your acceptance of the modified Policy. We will inform you about the modifications via email or comparable means within 15 days of such modification. We will also post the modified version on this page. Your continued use of our Platform, and the Services shall constitute your consent to such changes. SpringRole may change, modify, suspend, or discontinue any aspect of our Platform and the Services at any time without notice or liability.

19. LIST OF THIRD-PARTY SERVICE PROVIDERS

If a User authorizes SpringRole to create a consumer report, SpringRole shall collect public records by using the following third-party service providers for the provision of Services as detailed under the Terms of Service.

If you authorize us to create a background report about you, we'll collect public records and other information from reliable third-party sources to assemble the report. We may also verify the information you provide us against authoritative government databases or information providers.

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Serial Number	Name of Third-Party Service Provider	Contact Information
1.	Authenticating.com	Email: Telephone: Address:
2.	Google Analytics	Email: Telephone: Address:
3.	Stripe	Email: Telephone: Address:

SpringRole may also use other third-party service providers to provide the services described herein, whose names and addresses are available upon placing a request to us at privacy@springrole.com. Additionally, if you have any questions or concerns about our third-party service providers, please email us at privacy@springrole.com.

20. COPYRIGHT INFRINGEMENT/DMCA NOTICE

If you believe that any content on our Website violates your copyright, and you wish to have the allegedly infringing material removed, the following information in the form of a written notification (pursuant to 17 U.S.C. § 512(c) (“DMCA Takedown Notice”) must be provided to our designated Copyright Agent. It is our policy to terminate the accounts of repeat infringers.

- Your physical or electronic signature;
- Identification of the copyrighted work(s) that you claim to have been infringed;
- Identification of the material on our Services that you claim is infringing and that you request us to remove;
- Sufficient information to permit us to locate such material.
- Your address, telephone number, and email address;
- A statement that you have a good faith belief that use of the objectionable material is not authorized by the copyright owner, its agent, or under the law; and
- A statement that the information in the notification is accurate, and under penalty of perjury, that you are either the owner of the copyright that has allegedly been infringed or that you are authorized to act on behalf of the copyright owner.

SpringRole’s Copyright Agent to receive DMCA Takedown Notices is Kartik Mandaville, kartik@springrole.com, at SpringRole, Inc. Attn: DMCA Notice, 1447, 2nd St, suite 200, Santa Monica CA 90401. You acknowledge that for us to be authorized to take down any content, your DMCA takedown notice must comply with all the requirements of this Section. Please note that, pursuant to 17 U.S.C. § 512(f), any misrepresentation of material fact (falsities) in a written notification automatically subjects the complaining party to liability for any damages, costs and attorney's fees incurred by us in connection with the written notification and allegation of copyright infringement.

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21. CONTACT US.

To ask questions or comment about this policy and our privacy practices, contact us at:

- Kartik Mandaville (Privacy Officer)
- Email: privacy@springrole.com
- Address: SpringRole, Inc. - 1447, 2nd St, suite 200, Santa Monica CA 90401

PLEASE NOTE: WE DO NOT SELL YOUR PERSONAL INFORMATION, NOR DO WE INTEND TO DO SO. IF YOU USE OUR WEBSITE, PLATFORM, AND/OR SERVICES, YOU HAVE AGREED TO AND ACCEPTED THE PRACTICES DESCRIBED IN THIS POLICY AND THE TERMS AND CONDITIONS SET FORTH IN OUR TERMS OF SERVICE. IF YOU DO NOT AGREE WITH THE TERMS OF THIS POLICY OR THE TERMS OF SERVICE, PLEASE DO NOT USE OUR WEBSITE, PLATFORM, AND/OR SERVICES.