# Applicant Insight INC. DATA PRIVACY FRAMEWORK Policy

Effective Date: 09/02/2025

Applicant Insight INC. handles background screening information collected from within the European Union member countries and the United Kingdom. Applicant Insight INC. complies with ("GDPR") General Data Protection Regulation for collection, retention, and processing of human resource personal information strictly for background screening services for EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF)

This policy applies to what information will be collected by Applicant Insight INC. and how the information will be used. Applicant Insight's commitment to adhere to <a href="DPF Principles">DPF Principles</a> for all personal data received from the European Union and, as applicable the United Kingdom (and Gibraltar), and/or Switzerland in reliance on the relevant part(s) of the DPF program. The use of information collected through our Websites shall be limited to the purposes under this Privacy Policy and our Terms of Service to Applicant Insight INC. clients. Applicant Insight INC. is committed to protecting the privacy of our website visitors, clients and applicants.

Applicant Insight INC. complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Applicant Insight INC. has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union and the United Kingdom in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF. Applicant Insight INC. has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) Program, and to view our certification, please visit <a href="https://www.dataprivacyframework.gov/">https://www.dataprivacyframework.gov/</a>

Applicant Insight Inc. has certified to the Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) and to the rights of EU and UK individuals and Swiss individuals Data Privacy Framework Principles for transfer of HR (Human Resources) data. The Company may be subject to the investigatory and enforcement powers of the Federal Trade Commission.

### What information our Company will collect about you and the purpose:

Applicant Insight INC. may collect human resource personal information about you during the background screening process for our clients. Some information is provided by you as PII (Personally Identifiable Information) for example, your name, address, telephone number, birthdate, social security number etc. when completing an online application web form.

Applicant Insight INC. will not share your PII with 3<sup>rd</sup> parties.

#### How will our Company use the information collected?

We use personal information for the following:

Provide our clients with information that you (the applicant) agreed upon to be reviewed for a background search.

#### To whom do we disclose information we collect?

Applicant Insight INC. will only disclose information to the direct client an applicant submitted a job application to.

Updating Your Information: If you would like to update information that you provided, please login at: <a href="https://portal.Applicant Insight.com">https://portal.Applicant Insight.com</a> to update your profile.

Additional Rights for the EEA and Other Territories: If you reside in certain territories (such as the European Economic Area), you may have the right to exercise certain privacy rights available to you under applicable laws. We will process your request in accordance with the GDPR. We may need to retain certain information for record-keeping purposes and/or to complete transactions that you began prior to requesting any deletion. You can contact our Data Privacy and Protection office by sending an email to compliance@ApplicantInsight.com.

#### Choice:

If personal data covered by this privacy policy is to be used for a new purpose that is materially different from that of which the personal data was originally collected or subsequently authorized or is to be disclosed to a non-agent third party in a manner not specific in this policy, Our Company will provide you with an opportunity to choose whether to have your personal data so used or disclosed. Requests to opt out of such use or disclosures of personal data should be sent to us using the contact information below.

Certain personal data such as information about medical or health conditions, ethnic origin etc. will be considered sensitive information. Applicant Insight does not use sensitive personal information other than the purpose for which it was originally collected and subsequently authorized by the individual.

#### Complaints:

Applicant Insight INC. will address complaints concerning the handling of human resources (HR) data and provide appropriate recourse free of charge to the affected individual.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Applicant Insight INC. commits to cooperate and comply with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner's Office (ICO) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of human resources data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF in the context of the employment relationship.

# Right to correct:

You may have the right to request Applicant Insight correct any inaccurate or incomplete personal information. In compliance with EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) and to the rights of EU and UK individuals and Swiss individuals, Applicant Insight commits to resolve complaints about our collection or use of your personal information with inquiries or complaints regarding our Data Privacy Framework policy should first contact Applicant Insight at the following: <a href="https://www.applicantinsight.com/Support">https://www.applicantinsight.com/Support</a>

### Recourse, Enforcement & Liability

In compliance with EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) and to the rights of EU and UK individuals and Swiss individuals, Applicant Insight commits to resolve complaints concerning its processing of applicant data in accordance with the DPF principles. Any applicant who has a complaint about Applicant Insight's processing of his/her personal information should first contact Applicant Insight directly by calling +1 800-771-7703.

You may have the option to select binding arbitration under the Data Privacy Framework Panel for the resolution of your complaint under certain circumstances. For further information, please see the Data Privacy Framework website. To learn more about the Data Privacy Framework please visit <a href="https://www.dataprivacyframework.gov">https://www.dataprivacyframework.gov</a>

### Right of erasure:

You may have the right to erase personal information that we have on file if for example you no longer want to apply for a position with our client.

## Third Party / Onward Transfers:

Applicant Insight discloses personal data only to third party vendors who need such data for background screening and not for other purposes. Such recipients must agree to abide to Ai confidentiality agreements. In the cases of onward transfer of data, Applicant Insight may have liability unless it proves it was not responsible for the event leading to the damage.

Applicant Insight may provide personal data to third parties that act as agents to perform tasks on behalf of Ai for criminal background checks. Such agents agree to use the data only for background screening and must comply with the Data Privacy Framework principles for transfer and processing of the personal data.

#### Right to object / restrict processing:

You may have the right to request that Applicant Insight stop processing your personal information.

If you would like to exercise any of the above rights, please go to our website <a href="https://www.applicantinsight.com/Support">https://www.applicantinsight.com/Support</a> so that we may assist with your request. To protect your privacy and security, we need to verify your identity before complying with the request.

Applicant Insight has no direct relationship with our clients' customers or any third-party who may process personal information on behalf of a client. An individual who seeks access, or who seeks to correct, amend, delete inaccurate data or withdraw consent for further contact should direct his or her query to the company applied to. If our client requests Applicant Insight to remove the data, we will respond to its request within thirty (30) days. Ai will delete, amend or block access to any personal information that we are storing only if a written request to do so is submitted from our client or the applicant unless we have a legal obligation to retain such personal information. We reserve the right to retain a copy of such data for archiving purposes, or to defend our rights in litigation if necessary.

## International transfers of information:

Personal information, including information collected in the European Economic Area ("EEA"), may be transferred, stored, and processed by Applicant Insight and our service providers in the United States and

potentially other regions (i.e. Puerto Rico / Canada) whose data protection laws may be different to the Data Privacy Framework requirements.

We will not transfer personal information originating in the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) to third parties unless the third parties have entered into an agreement in writing with Ai to provide at least the same level of privacy protection to your personal information as required by the Principles of the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) Changes to this Privacy Policy

Applicant Insight may update this Privacy Policy periodically in response to changing business developments. We encourage you to review this Privacy Policy frequently to be informed of how Applicant Insight is protecting your information.

## Right to disclose personal information when required by law

Applicant Insight may require disclosing personal information in response to lawful requests by public authorities, including meeting national security or law enforcement requirements

#### How to contact Applicant Insight INC. with any inquiries or complaints

In compliance with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) Applicant Insight INC. commits to resolve DPF Principles-related complaints about our collection and use of your personal information. Individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) should first contact Applicant Insight INC at:

Applicant Insight INC. 7324 Little Road New Port Richey, Florida 34654