



**Information Network Associates, Inc.**

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# **Privacy Policy for Handling of Personal Data**

**April 25, 2017**

Information Network Associates, Inc. (“INA”) recognizes the importance of privacy related to personal information, and we strive to make every safeguard to protect the information we collect and process. This Privacy Policy (“Policy”) sets the principles INA follows related to transferred of personal information.

INA’s adherence to these principles may be limited in certain circumstances, particularly the following:

1. a conflicting or overriding legal obligation;
2. to the extent permitted by any applicable law, rule or regulation; or
3. when INA receives personal information as a data processor, acting on the instructions of a client.

INA may receive personal information from the EU for only processing; therefore, INA will not be required to apply the Notice, Choice, Data Integrity and Access principles to such information. The client remains responsible for this information and its processing, in accordance with EU laws, rules or regulations.

### **Capacity**

This Policy applies to personal information collected and received by INA from the EU in electronic and paper format. This information will mostly pertain to clients of INA and the clients’ business activities, which may include personal information about the clients’ employees, business contacts, customers, or other individuals the client may come into contact with. When this information is collected and processed, INA acts as a data processor on the instruction of INA’s clients. INA’s possession and use of this personal information is incidental to the primary task of providing pre-employment background screening services and investigations to INA’s clients.

### **Principles**

**Notice:** When INA obtains personal information from individuals from the EU it will inform them of the following:

1. INA’s intended purposes for collecting and using the personal information;
2. third parties (if any) to which INA discloses the personal information; and
3. the choices (if any) that INA offers for limiting the use and disclosure of personal information

Such notice will be provided in clear language at the time individuals are first asked to provide personal information to INA, or as soon as is applicable. INA will also provide notice to any individuals when INA uses such information for a purpose other than its original intended use. When INA receives personal information from subsidiaries, affiliates, clients or other entities based in the EU it will use and disclose such information in accordance with the notices already provided by the aforementioned entities and the consents made by the individuals to whom the personal information relates.

**Choice:** INA will offer individuals the opportunity to choose whether their personal information is to be disclosed to any third party (unless the disclosure is allowed and/or required by contract), or is to be used for a purpose other than that which was originally intended and agreed upon by the individual. Especially sensitive personal information may be given explicit consent regarding its disclosure among other personal information.

INA will provide individuals with clear and readily available means to exercise their choices. *Sensitive personal information refers to information related to an individual’s health condition, racial/ethnic origin, political opinions, religious/philosophical beliefs, trade union membership or sex life.*

**Onward Transfers:** INA will not disclose Personal Data to a third party, except as stated below:

In the event INA transfers Personal Data covered by this Policy to an affiliate or other third party, it will do so consistent with any notice provided to Data Subjects and any consent they have given. Before disclosing Personal Data to a subcontractor or third-party agent, INA will obtain assurances from the

recipient that it will: (a) use the Personal Data only to assist INA in providing the Services; (b) provide at least the same level of protection for Personal Data as required by the Principles; and (c) notify INA if the recipient is no longer able to provide the required protections. Upon notice, INA will act promptly to stop and remediate unauthorized processing of Personal Data by a recipient. INA will remain liable under the Privacy Shield principles if its agent processes such personal information in a manner inconsistent with the principles, unless INA proves that it is not responsible for the event giving rise to the damage.

INA may also be required to disclose, and may disclose, Personal Data in response to lawful requests by public authorities, including to comply with or respond to law enforcement or legal process or a request for cooperation, such as complying with legal requirements to disclose Personal Data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. To the extent permitted, INA will inform its relevant customer or prospective customer before making such disclosure and provide it with a reasonable opportunity to object to such disclosure.

**Security:** INA will take reasonable steps to ensure the protection of personal information in INA's possession. Such protections are aimed to prevent loss, misuse and unauthorized access, disclosure, alteration and destruction of personal information.

**Data Integrity:** INA will use the personal information it receives in ways relevant and consistent with the purposes the information was collected and/or authorized by the individual. INA will take reasonable steps to ensure this personal information is reliable, accurate, complete and current.

**Access:** INA will grant individuals reasonable access to personal information it holds about them, upon request. INA will also take reasonable steps to allow individuals to correct, amend or redact information that is proven to be inaccurate or incomplete.

**Enforcement:** INA will conduct internal compliance audits of its privacy practices to ensure adherence to this Policy. Any employee or third party INA determines to be in violation of this Policy will be subject to correction and possible disciplinary action or termination of employment. The Federal Trade Commission has jurisdiction to hear claims of unfair or deceptive practices, or violations of laws, rules and regulations governing information privacy.

Questions, concerns, or complaints regarding the use and/or disclosure of personal information by INA should be directed to INA at the address, provided below. INA will thoroughly investigate and attempt to resolve any complaints or disputes regarding the use and disclosure of personal information in accordance with the principles of this Policy.

For complaints that cannot be resolved between the complainant and INA, INA agrees to cooperate with data protection authorities in the EU and participate in any dispute resolution procedures established by such authorities.

INA complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. INA has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>

### **Contact Information**

In compliance with the Privacy Shield Principles, INA commits to resolve complaints about our collection or use of your personal information. Individuals in the European Union with inquiries or complaints regarding our Privacy Shield policy should first contact INA at:

Privacy Officer  
Information Network Associates  
5235 N Front Street, Harrisburg, PA 17110  
Phone: 1-717-599-5505  
Fax: 1-717-599-5507

INA has further committed to refer unresolved Privacy Shield complaints to Council of Better Business Bureaus (CBBB), an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please contact or visit <https://www.bbb.org/consumer-complaints/> for more information or to file a complaint. The services of CBBB are provided at no cost to you.

This Policy is available from [www.ina-inc.com](http://www.ina-inc.com)