

**EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-US DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) Policy**

Mind Your Business, Inc. is a US company and leading provider of background investigations, EEO investigations and drug screening services. Our employment screening system makes us a business to business (B2B) provider servicing a variety of government agencies, non-profit and for-profit entities across the spectrum.

# PARENT, SUBSIDIARY, OR AFFILIATE COMPANIES

Mind Your Business has no parent, subsidiary, or affiliate companies that are covered by this 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) Policy.

# AFFIRMATION OF EU-U.S. DATA PRIVACY POLICY

Mind Your Business, Inc. complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-US DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Mind Your Business, 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 Kingdome (and Gibraltar) in reliance on the EU-U.S. DPF. Mind Your Business, 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 <https://www.dataprivacyframework.gov/>.

# TYPES OF, AND PURPOSE FOR, DATA COLLECTED

Mind Your Business gathers personal information regarding individuals, who have unambiguously consented to in writing, on behalf of its clients by manually or electronically contacting the appropriate sources of the data (court records, references, licensing bureaus, etc.), including but not limited to:

1. criminal history at the federal, state, and local levels;
2. verification of credentials, including education and licensure;
3. state motor vehicle records abstracts;
4. consumer credit reports;
5. verification of present and past employment;
6. personal and professional references;
7. national and international sanctions and exclusions database checks;
8. sex offender registry checks; and,
9. drug and occupational health screening.

Mind Your Business, Inc. collects and uses personal information to prepare and provide background checks reports to employers or their agents (such as recruiters or staffing firms) for use in making employment-related decisions, such as who to hire, retain, promote, or re-assign. These reports may at times be use for:

1. investigation into a suspicion of work-related misconduct or wrongdoing;
2. investigation into matters of employee compliance with employer policies; or,
3. investigation into matters of employee compliance with federal, state, or local laws and regulations.

# TYPES OF THIRD PARTIES TO WHICH PERSONAL INFORMATION IS DISCLOSED AND PURPOSE FOR SUCH DISCLOSURE

Mind Your Business, Inc. transfers data to third parties such as: public record researchers, vendors and state regulated agencies. Mind Your Business, Inc. transfers data to these organizations to verify; employment, education, court records and credit bureaus to name a few. All companies we partner with go through a rigorous vetting process and are tested to ensure quality.

# RIGHT OF INDIVIDUALS TO ACCESS THEIR OWN PERSONAL INFORMATION FOR CORRECTION, AMENDMENT, OR DELETION

Mind Your Business, Inc. acknowledges that individuals have the right to access their personal information. An individual may request, in writing, access to all personal information collected and maintained about him or her by Mind Your Business, Inc. Upon receipt of such request, Mind Your Business, Inc. will provide all such information in a manner and form that maintains the security and confidentiality of the information. Mind Your Business, Inc. affords the individual a reasonable opportunity to correct, amend, or delete information that is inaccurate or incomplete, except where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy, or where the rights of persons other than the individual would be violated. In cases where the information is subject to the Fair Credit Reporting Act (“FCRA”), Mind Your Business, Inc. complies with the FCRA's requirements regarding access and correction rights of consumers. To request information relating to his or her personal information, the party may contact Mind Your Business, Inc. by e-mail at the following email address, [ccaruso@mybinc.com,](mailto:ccaruso@mybinc.com) or by fax at 1- 828-698-9918. In addition, the individual will be asked to provide enough evidence of his or her identity, so we may ensure that information is being released only to the subject of the data. If we are unable to provide the individual with access to his or her personal information or to correct the data, we will notify the individual and provide all relevant details and circumstances preventing Mind Your Business, Inc. from doing so. Note that depending on our contractual obligations with our client, for whom we procure the information, we may have to refer access inquiries to that specific entity.

# LIMITING USE AND DISCLOSURE OF PERSONAL INFORMATION

Although Mind Your Business, Inc. obtains an individual’s unambiguous consent in writing to its gathering and disclosure of personal information, and because of Mind Your Business’s

commitment to afford individuals every possible protection, if you would like to opt-out from Mind Your Business, Inc. using your personal information, or would like to limit its use and disclosure, send an email to [ccaruso@mybinc.com,](mailto:ccaruso@mybinc.com) or call 1-828-698-9915. If opting-out by email or telephone, please provide us with: (1) your complete legal name; (2) month and year of birth; and, (3) the name of the Mind Your Business, Inc. client with whom you have applied for a position. Additionally, individuals can request that their personal data be deleted or that its use be restricted to specific purposes. We will respond promptly to all requests in accordance with applicable data privacy laws and will work with you to ensure your preferences are respected.

# INDEPENDENT DISPUTE RESOLUTION MECHANISM

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Mind Your Business, Inc. commits to resolve complaints about your privacy and our collection or use of your personal information transferred to the United States pursuant to the DPF Principles. European Union, UK, and Swiss individuals with DPF inquiries or complaints should first contact Mind Your Business, Inc. at:

Mind Your Business, Inc. Attn: Christina Caruso 500 Beverly Hanks Center Hendersonville, NC 28792

1-828-698-9915

[ccaruso@mybinc.com](mailto:ccaruso@mybinc.com)

Mind Your Business, Inc. has further committed to refer unresolved privacy complaints under the DPF Principles to an independent dispute resolution mechanism, Data Privacy Framework Services, operated by BBB National Programs. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <https://bbbprograms.org/programs/all-programs/dpf-consumers/ProcessForConsumers> for more information and to file a complaint. This service is provided free of charge to you.

If your DPF complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See <https://www.dataprivacyframework.gov/s/article/G-Arbitration-Procedures-dpf?tabset-35584=2>

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Mind Your Business, Inc. commits to cooperate and comply respectively 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.

In the event that a dispute arises regarding our data privacy practices or the handling of personal data, individuals may seek recourse through the UK Information Commissioner's Office (ICO). The ICO provides a pathway for resolving privacy-related concerns, and we are committed to cooperating fully with the ICO to address any complaints or disputes. In addition to internal resolution processes, individuals may lodge a complaint with the ICO, who will assess and, if necessary, investigate the issue in accordance with UK data protection regulations. This serves as an independent recourse mechanism for ensuring that individuals' privacy rights are upheld.

# INVESTIGATORY AND ENFORCEMENT AGENCIES

Mind Your Business, Inc. is subject to the investigatory and enforcement powers of the Federal Trade Commission (“FTC”).

# DISCLOSURE OF PERSONAL INFORMATION PURSUANT TO LAWFUL REQUEST

Mind Your Business, Inc. may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

# ONWARD TRANSFER OF PERSONAL INFORMATION TO THIRD PARTIES

In the context of an onward transfer, Mind Your Business, Inc. is liable for the processing of personal information it transfers to third parties acting as our agents unless we can prove we were not responsible for the events giving rise to the damages.

# HUMAN RESOURCES DATA WITHIN THE CONTEXT OF THE EMPLOYMENT RELATIONSHIP

If your complaint involves human resources data transferred to the United States from the EU, the United Kingdomand/or Switzerland in the context of the employment relationship, and Mind Your Business, Inc. does not address it satisfactorily, Mind Your Business, Inc. commits to cooperate with the panel established by the EU data protection authorities (DPA Panel) (and/or the Swiss Federal Data Protection and Information Commissioner, as applicable) and comply with the advice given by the DPA Panel (and/or Commissioner, as applicable) with regard to such human resources data. To pursue an unresolved human resources complaint, you should contact the state or national data protection or labor authority in the appropriate jurisdiction. Complaints related to human resources data should not be addressed to the BBB EU-U.S. Data Privacy Framework Services.

Contact details for the EU data protection authorities and Swiss FDPIC can be found at <http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm> https://[www.edoeb.admin.ch/edoeb/en/home/the-fdpic/links/data-protection---](http://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/links/data-protection---) switzerland.html

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