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Ethos Risk Services Privacy Policy

CURRENT REVISION DATE AND VERSION: 11/19/2023 - v. 2.3

1 Privacy Policy

1.1 OVERVIEW

Ethos Risk Services is sensitive to privacy issues on the Internet. We believe it is important that you understand how we treat the information you may provide to us. This privacy statement applies to information collected by the websites we manage and control, including ethosrisk.com, ethosrs.com, evestigate.ethosinvestigations.com, and other domains owned and operated by Ethos Risk Services.

In the normal course of business, we will collect both personal information about you and non-personal information associated with you. We will always endeavor to protect this information, hold it in confidence, and protect it from theft. In general, we utilize both non-personal and personally identifiable information that you provide to us or that we collect in the normal course of business to communicate with you about our service and product offerings and deliver those offerings in an efficient manner. For these purposes, Ethos Risk Services employees, authorized contractors, and third-party agents will have access to some or all non-personal and personally identifiable information.

Unless specifically stated otherwise, the information you provide or that is associated with you is never shared with anyone other than Ethos Risk Services employees, authorized contractors, and third-party agents. Ethos Risk Services never trades or sells its users' personal information except as provided in this policy.

1.2 HOW WE GATHER INFORMATION

Ethos Risk Services gathers and stores information in many ways, including but not limited to the following:

1.2.1 Evestigate

Our case management system Evestigate requires unique identifiable user information to establish a user account and access available assets. This information includes first and last name, email address, phone number, and residential or business address, and can be provided by the user through an access request form within Evestigate or through our client services personnel. We will use this information to communicate with the user about relevant case work and services.

1.2.2 Media Kit Request

Our website ethosrisk.com has a form for requesting a media kit that can collect first and last name, email address, phone number, and address. This information will be used to provide the user with the requested media kit and for follow-up communications regarding our services.

1.2.3 Contact Form

Our website ethosrisk.com has a contact form that can collect first and last name, email address, and phone number. This information will be used to respond to the user and for follow-up communications regarding our services.

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1.2.4 Assignment Form

Our website ethosrisk.com has a form for new and existing clients to submit case work. This information will be pushed into our Evestigate case management platform and will be used to perform requested work and to communicate with the user about relevant case work and services.

1.2.5 Continuing Education

Our website ethosrisk.com has a form for requesting information about our continuing education opportunities that can collect first and last name, email address, phone number, and address. This information will be used to provide the user with the requested information and for follow-up communications regarding our services.

1.2.6 Newsletter

Our website ethosrisk.com has a form for subscribing to our newsletter that can collect first and last name, email address, phone number, and address. This information will be used to provide the user with the requested information and for follow-up communications regarding our services.

1.2.7 Pre-Employment Screening

Our website ethosrisk.com has a form for requesting a pre-employment screening for a job applicant that can collect first and last name, email address, phone number, and address of the user along with first and last name, maiden name, DOB, address, phone, gender, and race of the applicant to be screen. The user's information will be used to provide the user with the requested information and for follow-up communications regarding our services, the applicant information will only be used to provide the screening service.

1.2.8 Fingerprinting

As part of the fingerprinting services Ethos Risk Services provides, our website ethosrs.com has a form for scheduling a fingerprinting appointment that can collect first and last name, phone number, email, and an ORI/OCA number. This information will be used to communicate with the user about the scheduled fingerprinting appointment and to submit the fingerprint results to the state of Florida and associated recipients based on the ORI/OCA number.

1.2.9 Your Employer

Our client organizations can sign up individual employees into our Evestigate case management portal. This information includes first and last name, email address, phone number, and residential or business address. We will use this information to communicate with the user about relevant case work and services.

1.2.10 Normal Course of Business

When you contact Ethos Risk Services, we may keep a record of your communication to help solve any issues you might be facing. We may use your email address to inform you about our services, such as letting you know about upcoming changes or improvements.

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1.2.11 Marketing and Communications Channels

Ethos Risk Services may use Twitter, Facebook, Linked In, or other social media outlets to market and promote its offerings and services. Any communications you make with Ethos Risk Services using these media may be used by Ethos Risk Services in accordance with this policy.

1.3 VENDORS, SUPPLIERS, OR OTHER ACCESS TO YOUR INFORMATION

We may provide access to your personal information to our affiliates or other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.

1.4 LEGAL ACCESS TO YOUR INFORMATION

We may share personal information with companies, organizations, or individuals outside of Ethos Risk Services if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:

- meet any applicable law, regulation, legal process or enforceable governmental request.
- enforce applicable Terms of Service, Terms of Use, or other potential violation of Ethos Risk Services contracts or rules, including investigation of potential violations.
- detect, prevent, investigate or otherwise address fraud, security or technical issues.
- protect against harm to the rights, property or safety of Ethos Risk Services, our users or the public as required or permitted by law.

1.5 INFORMATION THAT WE COLLECT FROM YOU ON OUR WEBSITES

We also may use various technologies to collect information from your computer or device and about your activities on our websites.

1.5.1 Information Collected Automatically

We may automatically collect information from you when you visit our websites. This information may include your IP address, your browser type and language, access times, the content of any undeleted cookies that your browser previously accepted from us, referring or exit website address, internet service provider, date/time stamp, operating system, locale and language preferences, and system configuration information.

1.5.2 Cookies

When you visit our websites, we may assign your computer or device one or more cookies to facilitate access to our site and to personalize your online experience. Some of these cookies are necessary for the website to function, and others provide enhanced functionality and personalization. Other cookies help us measure and improve the performance of our websites, and some of the cookies are used to build a profile of your interests and show you relevant content. Using a cookie, we also may automatically collect information about your online activity on our site, such as the web pages you visit, the links you click, and the searches you conduct on our site. Most browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies. If you choose to decline cookies please note that you may not be able to sign in or use some of the interactive features offered

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on our websites. A cookie is a small text file that is stored on a user's computer or device for record keeping purposes. Cookies can be either session cookies or persistent cookies. A session cookie expires when you close your browser and is used to make it easier for you to navigate our website. A persistent cookie remains on your computer or device for an extended period. We may allow our authorized service providers to serve cookies from our websites to allow them to assist us in various activities, such as doing analysis and research on the effectiveness of our site, content and advertising.

You may delete or decline cookies by changing your browser settings (click "Help" in the toolbar of most browsers for instructions) If you do so, some of the features and services of our websites may not function properly.

1.5.3 Other Technologies

We may use standard Internet technology, such as web beacons and other similar technologies, to track your use of our websites. We also may include web beacons in promotional e-mail messages or newsletters to determine whether messages have been opened and acted upon. The information we obtain in this manner enables us to customize the services we offer to users of our websites to deliver targeted advertisements and to measure the overall effectiveness of our online advertising, content, programming or other activities. Web beacons (also known as clear gifs, pixel tags or web bugs) are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of web users or to access cookies. Unlike cookies, which are stored on the user's computer hard drive, web beacons are embedded invisibly on the web pages (or in email) and are about the size of the period at the end of this sentence. Web beacons may be used to deliver or communicate with cookies, to count users who have visited certain pages and to understand usage patterns.

1.6 INFORMATION COLLECTED FROM OTHER SOURCES

We may also obtain both Personal Information and other information about you from third party companies such data aggregation firms that sell public information and append this data to other information we have collected. Examples of such information that we may receive include updated postal and email addresses, as well as corporate and additional demographic information. We may combine this information with information we collect through our websites or from other sources.

1.7 HOW WE PROTECT YOUR PERSONAL INFORMATION

Ethos Risk Services safeguards the security of the data you send us with physical, electronic, administrative and managerial procedures. Likewise, we urge you to take every precaution to protect your personal data when you are on the Internet. These precautions include storing passwords in a reputable password manager, using unique passwords for every website or application, changing your password often, using a combination of letters, numbers, and symbols, and using a secure browser over a secured network.

Ethos Risk Services websites currently use at least TLS v1.2 encryption on all web pages where personal information is submitted. This is designed to protect the confidentiality of your personal information as it is transmitted to us over the Internet.

Any Ethos Risk Services website that processes credit card transactions has been designed to not store credit card numbers on our servers. Credit card numbers are submitted to a credit card authorization service. This service provides Ethos Risk Services with credit card validation information only. We do not have access to your personal financial data.

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Ethos Risk Services may employ independent contractors to help manage data services, and such contractors may have access to data, similar to the access we give our employees. For example, we may choose to use a third-party application service to manage our customer relationship management activities, and Ethos Risk Services may store sales account data, including personally identifiable information, with such a service provider. We endeavor to ensure that these third-party providers are protecting your information, but we are not ultimately responsible for their practices.

1.8 ACCESS AND USE OF YOUR PERSONAL INFORMATION

To review and update your personal contact information as a user of our Evestigate case management portal, log in with your username and password, click your name in the top right to access the menu, then select "Manage Your Account". We encourage you to review your preferences regularly to keep the information current.

If at any time after registering for information, your personal data changes, you change your mind about receiving information from us, wish to cancel your account or request that Ethos Risk Services no longer use your information to provide you services, contact us at privacy@ethosrisk.com to have the information changed or removed, subject to our need to comply with our legal obligations or contractual agreements.

1.9 NEWSLETTERS AND PROMOTIONAL EMAILS

If you no longer wish to receive our newsletters and promotional communications from Ethos Risk Services, you may opt-out of receiving them by following the instructions included in each newsletter or communication.

1.10 LINKS TO OTHER SITES

The Ethos Risk Services web sites contain links to other sites that are not owned or controlled by Ethos Risk Services. Please be aware that Ethos Risk Services is not responsible for the privacy or security practices of such other sites. We encourage you to be aware when you leave our site and to read the privacy statements of every web site that collects personally identifiable information.

1.11 CALIFORNIA CONSUMER PRIVACY ACT & CALIFORNIA PRIVACY RIGHTS ACT

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are residents of the State of California in the United States to annually request and obtain, at no charge, information about the personal information (if any) we have disclosed to third parties for direct marketing purposes in the preceding calendar year. This information would include a list of the categories of personal information that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request to the privacy@ethosrisk.com.

As of January 1st 2023, Ethos Risk Services is required to comply with the California Consumer Rights Act, an amendment and expansion of the CCPA. California residents may exercise their right to delete their personal information (subject to certain exceptions) correct inaccurate information, access their personal information, know what personal information collected and to whom it is sold, opt out of the sale of information, limit the use and disclosure of sensitive personal information, and bear no retaliation of exercising these rights. If you are a California resident and would like to make such a request, please submit your request to the privacy@ethosrisk.com.

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Ethos Risk Services refers California employees, job applicants, and independent contractors to section 1.2.7 of this policy to detail what data is collected and for what purpose. Ethos Risk Services does not sell or market applicant or employee data. Ethos Risk Services may provide employee and applicant data to a third-party software platform for the use of Human Resources management only. Employee data is retained for the duration of employment

1.12 CHILDREN

Our services are not directed to children under the age of 13. We do not knowingly collect personal information from children under the age of 13, nor do we knowingly distribute such information to third parties. If we become aware that we received personal information from someone under the age of 13, we will take steps to delete such information from our records. If you believe we have personal information from someone under 13, please contact us privacy@ethosrisk.com.

1.13 CHANGES TO THIS PRIVACY STATEMENT

We reserve the right to modify this privacy statement at any time, so please review it frequently. If we decide to change our privacy policy, we will post those changes to this privacy statement, the homepage, and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

1.14 CONTACT US

If you have any questions or suggestions regarding our privacy policy, please contact us at privacy@ethosrisk.com.

It is Ethos Risk Services' policy to respect your privacy regarding any information we may collect while operating our website. Accordingly, we have developed this privacy policy in order for you to understand how we collect, use, communicate, disclose and otherwise make use of personal information. We have outlined our privacy policy below.

- We will collect personal information by lawful and fair means and, where appropriate, with the knowledge or consent of the individual concerned.
- Before or at the time of collecting personal information, we will identify the purposes for which information is being collected.
- We will collect and use personal information solely for fulfilling those purposes specified by us and for other ancillary purposes, unless we obtain the consent of the individual concerned or as required by law.
- Personal data should be relevant to the purposes for which it is to be used, and, to the extent necessary for those purposes, should be accurate, complete, and up to date.
- We will protect personal information by using reasonable security safeguards against loss or theft, as well as unauthorized access, disclosure, copying, use or modification.
- We will make readily available to customers information about our policies and practices relating to the management of personal information.
- We will only retain personal information for as long as necessary for the fulfilment of those purposes.

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We are committed to conducting our business in accordance with these principles in order to ensure that the confidentiality of personal information is protected and maintained. Ethos Risk Services may change this privacy policy from time to time at Ethos Risk Services' sole discretion.