



## PRIVACY POLICY

Last Modified: August 17, 2015

### 1. INTRODUCTION

**a. Purpose.** The purpose of this Privacy Policy is to describe how CIS, Inc. ("CIS" or "Company") collects, uses and shares information about consumers through its business, including its online interfaces (e.g., websites and mobile applications) owned and controlled by, CIS, including [www.CISinfo.net](http://www.CISinfo.net) and [www.CISscreens.net](http://www.CISscreens.net) (collectively referred to herein as "Information").

CIS is a type of consumer reporting agency ("CRA") known as a "Reseller" pursuant to the Fair Credit Reporting Act ("FCRA"), 15 U.S.C. §1681a(u). As a CRA, CIS may furnish a consumer report that contains a particular consumer's personal information under the following circumstances and no other:

- (1) In response to the order of a court having jurisdiction to issue such an order, or a subpoena issued in connection with proceedings before a Federal grand jury.
- (2) In accordance with the written instructions of the consumer to whom it relates.
- (3) To a person which CIS has reason to believe:
  - (A) intends to use the information in connection with a credit transaction involving the consumer on whom the information is to be furnished and involving the extension of credit to, or review or collection of an account of, the consumer;
  - (B) intends to use the information for employment purposes;
  - (C) intends to use the information in connection with the underwriting of insurance involving the consumer;
  - (D) intends to use the information in connection with a determination of the consumer's eligibility for a license or other benefit granted by a governmental instrumentality required by law to consider an applicant's financial responsibility or status;
  - (E) intends to use the information, as a potential investor or servicer, or current insurer, in connection with a valuation of, or an assessment of the credit or prepayment risks associated with, an existing credit obligation;
  - (F) otherwise has a legitimate business need for the information—
    - (i) in connection with a business transaction that is initiated by the consumer; or (ii) to review an account to determine whether the consumer continues to meet the terms of the account.
  - (G) executive departments and agencies in connection with the issuance of government-sponsored individually-billed travel charge cards.
- (4) In response to a request by the head of a State or local child support enforcement agency (or a State or local government official authorized by the head of such an agency), if the person making the request certifies to the consumer reporting agency that—
  - (A) the consumer report is needed for the purpose of establishing an individual's capacity to make child support payments or determining the appropriate level of such payments;

- (B) the paternity of the consumer for the child to which the obligation relates has been established or acknowledged by the consumer in accordance with State laws under which the obligation arises (if required by those laws);
  - (C) the person has provided at least 10 days' prior notice to the consumer whose report is requested, by certified or registered mail to the last known address of the consumer, that the report will be requested; and
  - (D) the consumer report will be kept confidential, will be used solely for a purpose described in subparagraph (A), and will not be used in connection with any other civil, administrative, or criminal proceeding, or for any other purpose.
- (5) To an agency administering a State plan under section 654 of title 42 for use to set an initial or modified child support award.
- (6) To the Federal Deposit Insurance Corporation or the National Credit Union Administration as part of its preparation for its appointment or as part of its exercise of powers, as conservator, receiver, or liquidating agent for an insured depository institution or insured credit union under the Federal Deposit Insurance Act (12 U.S.C. 1811 et seq.) or the Federal Credit Union Act (12 U.S.C. 1751 et seq.), or other applicable Federal or State law, or in connection with the resolution or liquidation of a failed or failing insured depository institution or insured credit union, as applicable.
- (7) CIS may furnish a consumer report for employment purposes only if—
- (A) the person who obtains such report from CIS certifies to CIS that—
    - (i) the person has complied with paragraph (2) with respect to the consumer report, and the person will comply with paragraph (3) with respect to the consumer report if paragraph (3) becomes applicable; and
    - (ii) information from the consumer report will not be used in violation of any applicable Federal or State equal employment opportunity law or regulation; and
  - (B) CIS provides the consumer with the report, or has previously provided, a summary of the consumer's rights under this subchapter, as prescribed by the Bureau under section 1681g(c)(3) of the FCRA.
- (8) CIS may furnish a consumer report relating to any consumer pursuant to subparagraph (A) or (C) of subsection (a)(3) of this section in connection with any credit or insurance transaction that is not initiated by the consumer only if—
- (A) the consumer authorizes CIS to provide such report to such person; or
  - (B)(i) the transaction consists of a firm offer of credit or insurance;
  - (ii) CIS has complied with subsection (e) of this section; (iii) there is not in effect an election by the consumer, made in accordance with subsection (e) of this section, to have the consumer's name and address excluded from lists of names provided by the agency pursuant to this paragraph; and (iv) the consumer report does not contain a date of birth that shows that the consumer has not attained the age of 21, or, if the date of birth on the consumer report shows that the consumer has not attained the age of 21, such consumer consents to CIS furnishing such information.
  - (C) Consumer may elect to have the consumer's name and address excluded from any list provided by CIS under subsection (c)(1)(B) of this section in connection with a credit or insurance transaction that is not initiated by the consumer, by notifying the agency in accordance with paragraph (2) that the consumer does not consent to any use of a consumer report relating to the consumer in connection with any credit or insurance transaction that is not initiated by the consumer.

**b. Scope: Third Party Sites.** Some of CIS's Information is based on third parties that are not owned or controlled by CIS. Please be aware that CIS is not responsible for the privacy practices of such third parties.

## **2. INFORMATION THAT CIS COLLECTS**

As a Reseller, CIS assembles and merges information contained in the database of another consumer reporting agency or multiple consumer reporting agencies concerning any consumer for purposes of furnishing such information to any third party, to the extent of such activities; and does not maintain a database of the assembled or merged information from which new consumer reports are produced. CIS retains copies of the consumer reports that it has produced for a period of time in order to comply with certain record retention requirements. All such records are securely stored pursuant to CIS's Information Security Policy.

CIS also collects information that consumers provide to them. For example, CIS may collect information when a consumer modifies the consumer's credit information, purchases products or services from CIS, requests information from CIS, contacts CIS's customer support, or otherwise communicates with CIS. This information may include, but is in no way limited to:

- Name
- Address
- Billing address
- Shipping address
- Email address
- Telephone number
- Credit card number (solely for payment purposes)

## **3. HOW CIS USES AND SHARES CONSUMER INFORMATION**

**a. To Provide Products, Services, and Information.** As described above, CIS only shares consumer information when it collects information regarding a consumer so that it can provide consumer reporting products and services, and provide information that a consumer or a consumer's potential or existing creditor requests from CIS. CIS uses a consumer's personal information to contact the consumer about that consumer's consumer reports, including the consumer's possible disputes and inquiries.

**b. Sharing with Third Parties.** CIS may provide information to third party service providers that assists CIS process orders, and fulfill and deliver products and services. CIS may also use third parties to help host its Information and process payments. These service providers may have access to consumers' personal information in order to provide these services, but when this occurs CIS implements reasonable contractual and technical protections to limit the service providers' use of that information to helping CIS provide the service.

**c. Transfer in the Event of Sale or Change of Control.** If the ownership of all or substantially all of CIS's business changes or it otherwise transfers its assets relating to its business to a third party, such as by merger, acquisition, bankruptcy proceeding or otherwise, CIS may transfer or sell consumers' personal information to the new owner. In such a case, unless permitted otherwise by applicable law, the consumers' information would remain subject to the promises made in the applicable privacy policy.

#### **4. SECURITY OF YOUR INFORMATION**

CIS uses industry standard physical, technical and administrative security measures and safeguards to protect the confidentiality and security of consumer and its proprietary information. However, since the Internet is not a 100% secure environment, we cannot guarantee, ensure, or warrant the security of any information a consumer may electronically transmit to CIS. There is no guarantee that information may not be accessed, disclosed, altered, or destroyed by breach of any of CIS's physical, technical, or managerial safeguards.

#### **5. CHANGES TO CIS'S PRIVACY POLICY**

CIS's Privacy Policy may change from time to time. CIS will not reduce the rights under this Privacy Policy, except as permitted by applicable law. CIS will post any privacy policy changes on its website and, if the changes are significant, it will provide a more prominent notice (including, for certain services, email notification of privacy policy changes).

#### **QUESTIONS AND HOW CONTACT US**

If you have any questions, concerns, complaints or suggestions regarding CIS's Privacy Policy or otherwise need to contact CIS, please contact CIS by email at [compliance@cisinfo.net](mailto:compliance@cisinfo.net), by phone at (800) 275-7722 or by US postal mail at the following address:

PO Box 5000, Route 517, Allamuchy, NJ 07820