



## EXHIBIT D

### Consumer Information Privacy Policy

<b>Department</b>	Compliance/Operations	<b>Effective Date</b>	04/01/2018
<b>Owner</b>	Jared Delacerda	<b>Revision Date</b>	04/01/2018
<b>Description</b>	Document the purpose of the collection of consumer information, the intended use, and how information is shared, stored, and destroyed.		

Shield Screening is a consumer reporting agency. It is required by the Fair Credit Reporting Act, 15 U.S.C. §1681 *et seq.* (“FCRA”) to maintain the confidentiality of all consumer information.

Shield Screening obtains information on an individual consumer only upon the request of a user who has a permissible purpose under the FCRA to request information on that consumer. The FCRA requires a user to certify to Shield Screening that it has obtained the written consent of the consumer to request information before Shield Screening can supply the requested information.<sup>1</sup> The user must submit to reasonable audits by Shield Screening to confirm that it is, in fact, obtaining such consents.

Shield Screening does not maintain a database of consumer information.

Any information gathered on any consumer may only be provided to the user authorized by the consumer to receive the information. Shield Screening cannot and does not share, sell or distribute consumer information with or to any third party other than the requesting party thereof. Any consumer, upon proper identification, has the right under the FCRA to request Shield Screening to furnish to the consumer any and all information it may have on that consumer. The consumer has the right to dispute the accuracy or completeness of any information contained in the consumer’s file. The consumer’s rights under the FCRA may be obtained by contacting us or going to the FTC website at: <https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>

However, Shield Screening may be required, upon receipt of a court order to release the information in civil litigation or as otherwise required by law, to disclose information regarding a consumer to law enforcement agencies.

---

<sup>1</sup> There is an exception for employer investigations of suspected employee misconduct or for compliance with law or employer policies, e.g., sexual harassment investigations.

Revised 11/14/2012

Revised By: Tammy Person

Other privacy initiatives and procedures include, but are not limited to:

- Access to confidential consumer information is limited within Shield Screening to those who have a need to know the information: obtaining and transmitting information on the consumer or those dealing with a consumer request for information or consumer disputes.
- Access to Shield Screening's computer terminals, file cabinets, fax machines, trash bins, desktops, etc. are secure from unauthorized access.
- Shield Screening maintains a secure network to safeguard consumer information from internal and external threat.
- Any backup data is maintained in an encrypted form.
- Shield Screening maintains records on each request for information and identifies each user who requested information on a consumer.
- Employees are prohibited from "browsing" files or databases without a business justification.
- Destruction of consumer information follows the Federal Trade Commission's
  - requirements that the information be unreadable upon disposal.
- Shield Screening uses cookies on our website.

