

## Privacy Policy (FCRA Addendum)

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# Addendum to the Privacy Policy (notice to persons in the United States)

This Addendum is provided to US residents who are natural persons (“**Consumers**”) and is solely applicable to Control Risks Group LLC where it processes Consumer data for the provision of services which are governed by the Fair Credit Reporting Act 15 U.S.C. § 1681 (the “**FCRA**”).

This Addendum should be read in conjunction with Control Risks’ [Privacy Policy](#) (the “**Privacy Policy**”). Capitalized terms not otherwise defined in this Addendum shall have the meanings ascribed to them under the Privacy Policy.

Where there are conflicts between this Addendum and the Privacy Policy, this Addendum shall control but only to the extent that the FCRA applies.

“**consumer**”, “**end user**”, and “**permissible purpose**” mean those concepts, roles and activities as defined in the FCRA.

### Permissible Purpose

Control Risks may be engaged by clients to provide written, oral, or other communication of information bearing on a Consumer’s credit worthiness, credit standing, credit capacity, character, general reputation, personal characteristics, or mode of living (a “**Consumer Report**”) which is used or expected to be used or collected in whole or in part for the purpose of serving as a factor in evaluating a Consumer’s eligibility: for

- employment;
- promotion;
- reassignment; or
- retention,

as a potential or existing employee (“**Employment Purposes**”). Employment Purposes are seen as permissible purposes for generating Consumer Reports under the FCRA. In such circumstances, clients must certify to Control Risks that they have a permissible purpose for obtaining the Consumer Report and clients may not share the contents of the Consumer Report, either in whole or in part, with any further third parties other than the Consumer in question.

## Consumer Rights

Under the FCRA, a Consumer (“you”) has certain rights regarding their data.:

### [You have the right to know if information contained in a Consumer Report has been used against you.](#)

Where a Consumer Report is used to deny an application for credit, insurance, or employment – or to take another adverse action against a Consumer – the Consumer must be notified in writing. Generally, Control Risks will not be able to provide this information as it does not make the employment decisions or give an opinion on a Consumer’s eligibility for Employment Purposes. Please contact your employer or prospective employer to exercise your rights to know if information in a Consumer Report has been used against you.

### [You have the right to access your file.](#)

You have the right to request and obtain any information about you in a Consumer Report. In some cases, Control Risks will provide this information for free, for example if:

- a person has taken adverse action against you because of information in your Consumer Report;
- you are the victim of identity theft and place a fraud alert in your file;
- your file contains inaccurate information as a result of fraud;
- you are on public assistance; or
- you are unemployed but expect to apply for employment within 60 days.

### [You have the right to rectification.](#)

If you identify information in your file that is incomplete or inaccurate, Control Risks will initiate a dispute procedure to correct or explain the disputed information (unless Control Risks determines that your request is unfounded or without merit). See <https://www.consumerfinance.gov/rules-policy/regulations/1022/43/> for an explanation of dispute procedures under the FCRA.

### [You have the right to have inaccurate, incomplete or unverifiable information deleted.](#)

Inaccurate, incomplete, or unverifiable information must be removed or corrected, usually within 30 days. Generally, Control Risks will resolve disputes within 30 days of initiation of the dispute procedure. However, Control Risks may continue to report information it has verified as accurate.

## More information

This Addendum is subject to changes, amendments, or may be supplemented from time to time. New versions will be published on our website and will be effective immediately upon publication. Changes may also be communicated via email. Please check this page occasionally to see any updates or changes.

For any questions regarding this Addendum, please contact us using the details in the “Contact” section of the Privacy Policy.

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