



S.I.S.S.

Screen International Security Services Ltd.

General Privacy Policy & Security Notice

Screen International Security Services Ltd. ("SISS") is concerned about the protection of personal information. SISS is committed to protecting the privacy of clients and users. It is our policy to keep company and personal information (such as name, phone number, address, e-mail address, and research/verification results) private and confidential. We do not sell or rent your personal information or your company's information to others. It is SISS' policy to maintain the confidentiality and privacy of personal data submitted to SISS in writing, electronically, or while visiting www.sissltd.com. All employees of SISS receive a thorough background check as a condition of employment and adhere to our internal policies and procedures. We maintain paper shredders or locked shredder bins in all office areas, all computers are password protected, all internal networks are protected by firewalls, all file cabinets remain locked with only pertinent personnel having access to the keys, and we actively monitor and control the entrance of anyone to our premises.

Information You Provide

SISS will not disclose the personal information you provide to a third party without your permission, except in connection with the business transaction for which it was collected. Third party disclosure of the information you provide may include affiliate companies, third party agents, in-country sources, educational institutions, employers, courts, law enforcement agencies and other persons or entities that may provide or verify information as necessary for SISS to process your transaction. Information you provide may also be disclosed in response to legal requirements. SISS does not sell or rent the personal information you provide; nor does SISS maintain or sell mailing lists or exchange services in return for the use of your information.

Information Collected and Electronically Stored Automatically

When you visit our website to read or download information, we may automatically collect and electronically store only the following information described below:

- Domain name/URL type and IP address from which you access our website
- Type of browser and operating system used to access our website
- Date, time, country, state, telephone area code where your server is located
- Pages of our site that were viewed during your visit
- Internet address of the website from which you linked directly to our website; and the pages you viewed

This information is collected to help us to improve our website, determine technical design specifications, and identify system performance or problem areas.

Information Collected via E-Mail

If you identify yourself by sending an e-mail containing personal information, you may volunteer to provide us personally-identifying information such as your mailing address or phone number, for example. E-mail is not necessarily secure against interception. If your communication is very sensitive or includes confidential information, you may want to send it via postal mail, fax, or a secure exchange service/platform. Information collected in this manner may be used for responding to requests for information.

Security, Intrusion, and Detection

For security purposes, all network traffic is monitored in order to identify unauthorized attempts to upload or change information, or cause damage or conduct criminal activity on this website. To protect the system from unauthorized access and use, and to ensure that the system is functioning properly, individuals accessing our website are subject to having all of their activities on this website monitored. Unauthorized attempts to upload or change information, or otherwise cause damage to this website, are strictly prohibited and may be punishable under federal law.

Personal Information Disclosure: United States and Overseas

SISS does not transfer personal data to third parties outside of the United States or its territories, except in cases where such transfer is necessary to conduct a background check on you from sources of information outside of the United States.

Disclaimer

While SISS believes the information herein to be reliable, human or mechanical error remains a possibility; therefore, SISS does not guarantee or warrant the accuracy, completeness of the information posted on this website. SISS shall not be responsible for any error or omission, or for the use of, or the results obtained from the use of, this information.

Policy Changes

This policy may be amended from time to time. Any changes that are made to the existing privacy policy of SISS will be posted on this website.

Contact Information

If you have questions about our privacy and security policies, contact us toll-free at (800) 838-7477.

CALIFORNIA PRIVACY STATEMENT

This California Privacy Statement supplements SISS's General Privacy Policy and Security Notice and is intended for and applies solely to all visitors, users, clients, and others who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act (CCPA) and any terms defined in the CCPA have the same meaning when used in this notice. SISS is referred to in this Notice as "we" or "us". This Notice explains how we collect, use, and disclose personal information about California residents. Under the CCPA, "personal information" is information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly with a particular California resident or household ("Personal Information"). Personal Information does not include publicly available information, such as information that is lawfully made available from federal, state, or local records, and de-identified or aggregate consumer information.

SISS's Role

SISS may collect and use consumer personal information for its commercial and business purposes and related operational purposes. SISS may have direct responsibilities as a business subject to the CCPA. For example, for certain activities related to direct interaction with consumers who have a direct relationship with SISS, interacting with prospective/current clients, website and web application use, engaging vendors, and interacting with visitors/users of our Website. In these cases, this privacy policy is applicable. SISS also collects information in its capacity as a service provider to our clients, providing investigative, consultancy, security and related services. In that case, SISS may receive personal information from our clients where we have no direct relationship with the individuals whose personal information we process, and information is provided to us solely for the business purpose of providing those services. If you are a customer or other user associated with one of our clients on whose behalf we have collected or processed your information, this privacy policy does not apply to you, and if you have questions or wish to exercise your rights relating to your personal information (such as information, access or deletion), please contact that client directly.

Business Purposes

We collect personal information to offer and administer our services and products. These include investigative, consultancy, security and related services. We use personal information for the following business purposes:

- To provide the products or perform services for clients pursuant to a written agreement, including contacting you in the course of our ordinary commercial relationship, verifying client information, processing payments, or similar activities as needed to provide services for or on behalf of our clients.
- To improve our communications with you. Emails sent to you by SISS may include standard tracking, including open and click activities. SISS may collect information about your activity as you interact with our email messages and related content in order to verify or maintain the quality of our communications.
- For operating and improving our website and web applications and your customer experience, including debugging to identify and repair errors that impair existing intended functionality or to verify or maintain the quality of our website, and to improve,

upgrade or enhance the website services. For example, we may collect and analyze data on your use of our website and process it for the purpose of improving our online experience.

- For security purposes, including detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity.
- For other business purposes, which will be disclosed at the time we collect personal information.

Categories of Personal Information under the CCPA:

- **Identifiers.** This may include a real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.
- **Personal information described in the California Customer Records Statute (Cal. Civ. Code § 1798.80(e)).** This may include a name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.
- **Characteristics of Protected Classification under California or Federal Law.** This may include age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth, and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).
- **Commercial information.** This may include Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- **Biometric information.** This may include genetic, physiological, biological, or behavioral characteristics that can be used, singly or in combination with each other or with other identifying data, to establish your identity, including deoxyribonucleic acid (DNA), fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.
- **Internet or other similar network activity.** This may include browsing history, search history, or information on a consumer's interaction with a website, application, or advertisement.
- **Geolocation data.** This may include physical location or movements.
- **Sensory data.** This may include audio, electronic, visual, thermal, olfactory, or similar information.

- **Professional or employment-related information.** This may include current or past job history or performance evaluations.
- **Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. § 1232g, 34 C.F.R. Part 99)).** This may include education records directly related to a student maintained by an educational institution or party acting on its behalf, such as report cards, transcripts, class lists, student schedules, student identification codes, student financial information, and student disciplinary records.
- **Inferences drawn from other personal information.** This may include information, data, assumptions, or conclusions derived from facts, evidence, or another source of information or data reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.

Categories of Personal Information We Collect

The following are the categories of personal information under the CCPA that we have collected on consumers in the preceding 12 months:

- Identifiers
- Personal Information described in the California Customer Records Statute (Cal. Civ. Code § 1798.80(e))
- Characteristics of Protected Classification under California or Federal Law
- Commercial Information
- Internet or other similar network activity
- Geolocation data
- Professional or employment-related information
- Non-public educational information (per the Family Educational Rights and Privacy Act (20 U.S.C. § 1232g, 34 C.F.R. Part 99))
- Inferences drawn from other personal information

We may collect your personal information from the following sources.

- Information directly from you, the consumer, that you choose to provide, when you interact with us, for example, when you communicate with us by phone, email or otherwise, register for an event, subscribe to marketing or other communications, or inquire about or purchase a product or service.
- Information we automatically collect when you interact with our website, content or emails such as your IP address and the pages you visited, and when you use our services, we may collect information on how you use those services. Please see our Website Use and Cookies Policy for additional information.
- Information provided by our clients in order for us to provide specific services as a service provider, or information from third parties, acquired at the direction of our clients in order to provide the services.
- Information from other sources, including service providers or publicly available sources.

Disclosure/Sharing of Personal Data

In the preceding 12 months, we have not sold any personal information.

We share personal information for business purposes with the following categories of third parties:

- Our affiliates, as needed to operate our business and provide services.
- Service providers, such as vendors, consultants and other service providers who perform certain services on behalf of SISS, in which case we enter a contract that describes the purpose of processing and requires the recipient to not use it for any purpose except performing the contracted service.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

Your Rights

Subject to the CCPA and other applicable laws, you have the following rights concerning your data processed by SISS:

- Access: You have the right to request to access the personal information that SISS holds about you, including categories of information collected, categories of sources from which the information is collected, our business purpose for collecting information, and categories of third parties with whom we share your information.
- Deletion: You can request that SISS erase/destroy your personal data.
- Non-discrimination: SISS will not discriminate against a consumer because the consumer exercised any of the consumer's rights under the CCPA.

Please contact us if you wish to exercise your rights under CCPA

Email: mihran@sissltd.com

Telephone: +1 800-838-7477

In Writing: SISS Ltd, 9300 Wilshire Blvd, Suite 450, Beverly Hills, CA 90212