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Privacy at Sterling

Version 2.3
September 22, 2023

Changes in this version:

- Addition of Quebec-specific procedures and codes of practice via linked PDF
- Updates to Sterling office addresses
- Addition of A-Check through acquisition



Sterling is built on privacy and trust.

Organizations and individuals around the world trust us to collect, verify, and protect millions of people's background and identity information. We need to earn and keep that trust for our business to work.

This document helps us do that by telling you what we do with your **personal information**, which is any information that can identify you. This document is divided into three parts: [The Basics](#), [The Details](#), and [The Legal and Technical Stuff](#). This way we can include all the information that the law says we should, without making the important parts too hard to understand.

A note about this document

This document is a static version of [our privacy website](#), and it is very long. It is intended to be layered, meaning you see the most important information first, and you choose whether to get more details. On the website, the various sections and tables only open up if you deliberately expand them. Some people will find reading this information online easier than reading it in this format.

Please start by reading [The Basics](#) and use the links embedded in this document to find the information that is most important to you. If you cannot find what you are looking for, or if you have suggestions for how we can make this easier to read, please [contact us](#).

The Basics

How we use your personal information depends on why we have it. We might have your personal information for more than one reason. In this document, we use these words to describe our relationships with different people:

- If we are doing services for you or our client to check your background or identity, whether it is for employment, tenancy, volunteering, platform use, or another purpose, you are a **candidate**
- If you are accessing one of our publicly available websites, you are a **website visitor**
- If you can order our services as an individual or as part of an organization, to get background or identity information about yourself or someone else, you are a **client**
- If we think you might want to be our client because of your job, your online behavior, or because you contacted us, you are a **prospect**
- If we ask you for information to help complete background or identity services (for example to verify someone's past employment, provide a reference, or witness a form), you are a **source**
- If you work for Sterling as an employee, contractor, vendor, or volunteer, you are applying to do work for us, or you used to do work for us, you are a **worker**

These are the most important things to know about how we handle personal information:

We do not sell your personal information.

+ Tell me more.

- Our clients pay us to collect and compile candidates' personal information, but we [do not sell it](#).
- We use personal information about clients, prospects, sources, workers, and website visitors to market and sell our services, operate our business, and provide background screening and identity services, but we do not sell it to other people or organizations.

We follow the law when we collect and use your personal information.

+ Tell me more.

- There are many laws around the world that apply to us. They set different rules about privacy. Some of the things we talk about in this document are only allowed in certain places. When we are not allowed to do something, we do not do it
- Sometimes, the law that applies to your personal information is the law where you live. Sometimes, it is the law where you work, where our client is located, or where we are located. If you want to know which laws we apply to your personal information, [contact us](#)
- The General Data Protection Regulation (GDPR) and other European privacy laws set unique standards for privacy, including the need to have a "lawful basis" before collecting or handling personal information. For more information about how European privacy laws apply to us, [click here](#)
- The California Consumer Privacy Act (CCPA) also has special requirements. For more information about those, [click here](#)
- We are an APP entity and we therefore follow the [Australian Privacy Principles](#), which set out certain requirements for handling personal information in Australia
- If the law requires us to have a 'privacy policy' or otherwise provide information about how we handle personal information, this document is intended for that purpose

We are registered with public authorities to conduct national police checks in Canada, the United Kingdom, Australia, the United States, and other countries.

+ Tell me more.

- A significant part of our business is conducting criminal record checks or police checks, which we do in most countries around the world. When we conduct a police check, it is either because you asked us to, because our client asked us to, or because you are (or want to become) one of our workers
- When our client asks us for a police check, they determine the [purposes for the check](#). When you ask us for a police check, our purpose is to provide you a service that you have freely chosen to use. When we do police checks on our workers, our purpose is to protect our company and other workers and comply with our legal and contractual obligations
- In **Canada**, local police services do police checks by searching the Canadian Police Information Centre (CPIC), a part of the Royal Canadian Mounted Police (RCMP). We have RCMP-approved contracts with our local police partners and always follow RCMP policy and Canadian laws when conducting police checks in Canada
- In the **United Kingdom**, each constituent country has its own service for conducting police checks, and there are different levels of check depending on the purpose. We work as a registered body with the Disclosure and Barring Service in England and Wales, and we have similar relationships with Disclosure Scotland and AccessNI. We conduct these checks according to each disclosure service's code of practice and UK law
- In **Australia**, we conduct national coordinated criminal history checks as an accredited body with the Australian Criminal Intelligence Commission (ACIC). We follow all ACIC rules around how those checks are done, which include the Australian Crime Commission Act 2002 and the [Australian Privacy Principles](#)
- In the **United States**, we are an FBI-approved channeler for forwarding fingerprints to the FBI and delivering FBI background check results. We conduct those checks strictly in accordance with FBI rules and guidelines
- In other countries, if we are required to be registered or licensed to conduct police or criminal record checks, we either become registered, or we work with a [partner or service provider](#) that is registered
- Results of police checks have no set expiry date. They are point-in-time checks, meaning that the results only reflect police records on the date they are released by each police agency. Decision makers are responsible for determining how long police checks are to be accepted as 'valid,' based on their own risk management strategy and assessments

If you are a candidate or a source, we use your personal information to complete only the services our client asks for. We share service results only with the client that requested them.

+ Tell me more.

- We offer a lot of services which involve many [types of personal information](#). Our client decides which services to order, so you should ask them what services are being done in your case
- We collect some information from you, some from our client, and some from [other sources](#) that have information about you
- We do not keep an ongoing file about you and provide that file to clients who ask for it. Instead, we create a new file each time one of our clients asks us to complete services about you. Each file is only accessible to one client
- We offer some services that involve ongoing monitoring of arrest records, professional licenses, government watch lists, or other publicly available information. This monitoring is only done for the client that requests it, and any information we found is only provided to that client.
- We sometimes use information from services we performed previously to allow us, or other similar companies we partner with, [to complete new services about you faster and more accurately](#). For example:
 - If we already verified your education, we or our partner might not verify it again. Instead, we might check the information we received from you or the educational institution and bring that information into a new background check; or
 - If you disputed past background check results and that caused a correction to your information, we or our partner might bring that corrected information into a new background check; or
 - If we already found out where to look for background information about you, we or our partner might use that knowledge to check in the same place again if we get a new background check
- We or our client tell you before we collect your personal information to complete services, and have you sign a form to say it is OK. [There are some exceptions](#), but they are rare and only when the law allows it

- We may also need to use your personal information to [make sure our systems and services are efficient, accurate and secure](#), comply with the law, and comply with our contractual obligations with sources

If you are a website visitor, or a client or candidate using one of our service platforms, we track what you do on our websites to make sure they are working and to give you useful information.

+ Tell me more.

- We use [cookies and other tracking tools](#) to watch what you do on our websites. This helps us make sure the websites are secure and working properly and helps us look for ways to make them better
- We might try to find out your location and other information about you to give you information that will be useful to you

If you are a website visitor, advertisers and social media platforms can also track your activities.

+ Tell me more.

- Like most companies, we work with other organizations to make the information on our websites interactive, exciting and relevant
- Our public websites have advertisements and social media buttons. These allow [advertising providers and social media platforms to see what you do](#), because when your computer downloads those buttons or advertisements, it communicates directly with those other organizations' servers

If you are a client or a prospect, we try to tell you about our services unless you tell us not to.

+ Tell me more.

- We use contact information from the internet or from companies that sell professional contact lists to contact people who might want to use our services
- We use information about people who look at our websites and buy our services to target advertising
- We ask social media platforms and advertisers to target ads to the kinds of people that might need our services
- We do not use your personal information for marketing and sales [if you ask us not to](#)

If you are a worker, we use your information to make sure you get pay, benefits, and a safe, efficient, compliant, and fair workplace, but we also respect your right to a private life.

+ Tell me more.

- We collect [a few kinds of personal information from you and others](#) to decide if you are the right person for the job and to protect our company
- Where permitted by law, we monitor your activities in our offices and on our computer and phone systems to ensure safety, security, quality of work, productivity, and compliance with company policies
- We collect personal information and [share it with other organizations or government bodies](#) if necessary to comply with the law, pay you, and provide benefits

- We do not track your activities when you are not in our offices or connected to our computer equipment or systems, or look into your activities outside of work. The only exception is if we suspect illegal activity or other serious misconduct and the law allows us to investigate further

We work hard to make sure your personal information stays secure.

+ Tell me more.

- We encrypt personal information when it sits in our systems and transits between our systems
- We use firewalls, data loss prevention tools, and other barriers and alerts to watch out for hackers, viruses, and other threats
- We and independent third parties and clients do audits and tests to make sure our security systems are working
- We do our best to reduce the amount of information we process and transfer to the bare minimum
- We collect and communicate personal information outside of Sterling through secure channels whenever possible
- We lock paper documents in secure places
- We make sure only approved people come into our offices
- We only work with [service providers that also have a high standard](#) for protecting your personal information
- For more information about information security, [keep reading here](#)

We only keep your personal information for as long as we need it.

+ Tell me more.

- If you are a candidate and services were requested by our client, we keep your personal information until our client asks us to delete it
- Sometimes, the law or a source requires us to keep information for a minimum amount of time
- If you are a candidate having fingerprint collection or screening done in the United States, we do not keep your fingerprints for more than 29 days
- If you are a candidate having a national coordinated criminal history check done in Australia, we keep the results of that check for no more than 12 months, and we keep the information you submitted for us to complete the check for no less than 12 months and no more than 18 months
- If you are a candidate and we receive a UK criminal disclosure certificate about you, we keep it for no more than six months
- If you are a client, we keep your personal information at least as long as you are using our services
- If you are a worker, we keep your personal information as long as you work for us, and for a certain amount of time afterwards based on local rules and customs. We might delete some things sooner if we do not need them anymore
- For more information about retention of personal information, [keep reading here](#)

We use trusted partners and service providers to help us do our job and manage our business.

+ Tell me more.

- When we provide services, [we work with other companies](#) around the world to support our activities
- We work with technology companies to build and manage our computer systems. While they do not usually have a reason to use your personal information, they might have it in their custody or need to access it to do their work
- We work with other companies that do the same kind of services that we do, to perform services that our workers cannot because we do not have an office in a certain place, we do not know a certain language, or we need another kind of help

- If you are a worker, we work with other companies to help us train you, monitor your work and improve efficiency, pay you, and provide benefits

We are a global company, and we transfer personal information between countries. We protect your personal information and respect your rights the same way, no matter what.

+ Tell me more.

- We have offices [all over the world](#). Some of these mostly do work for their own countries or regions. Others, such as our offices in India and the Philippines, support everything we do around the world
- Where we do not have offices, we work with local [partners and service providers](#) that help with local services
- We do not transfer personal information across borders if the law, or our contract with our client or source, says we cannot
- Our [information security](#) is the same everywhere, so your information stays secure no matter where it goes
- In any country where personal information is handled, [that country's government, police or courts can sometimes demand access](#). It is not easy for governments or courts to do that, and it is very rare. If that happens, [we will carefully consider our response](#) with your interests in mind
- If you are candidate undergoing fingerprint collection or screening in the United States, we do not transfer your personal information outside the United States
- If you are a candidate undergoing a national coordinated criminal history check in Australia, transfers of your personal information are [limited to specific countries](#)
- There are rules about [transferring personal information from Europe](#). We follow these rules carefully, including by being Privacy Shield certified and signing special contracts within our organization and with our service providers. Sometimes, we or our client might need your consent to transfer personal information outside of Europe
- If you live in California, please read our [Personal Information Disclosure: United States or Overseas](#)

We do not want information about kids. Please do not give it to us!

+ Tell me more.

- Our websites and our services are designed for adult business professionals, not for children. If you are a child, please do not use our websites or services
- We do not perform background or identity services on young people. In the US, that means people under 18 years old. In other countries the age can be younger, but we do not normally perform any services anywhere, on children under 13 years old. If you are a candidate under 13 years old or if you are asked to give us information about a child, please [contact us](#) so we can review your case
- We do not employ children as workers

We will help you understand and exercise your rights to access, correct, delete, and make choices about your personal information.

+ Tell me more.

- You can make choices about your personal information. Sometimes you also have certain rights under the law. You can [contact us](#) to make choices and exercise your rights, but we cannot always do what you ask us to do. Sometimes we have to do something different to follow a law, a contract or our own policy. Sometimes we have to ask our client what to do
- If we are using your information based on your consent, you can [contact us](#) to withdraw your consent at any time. If we are using your information based on something other than your consent, like a legal or contractual obligation, then we might still need to use your personal information even if you want to withdraw your consent

- If you think information we have about you is incorrect, [contact us](#) and we will investigate and, if necessary, correct it. If we received your personal information from another party, like a credit bureau or police service (including ACIC, the RCMP, the DBS or the FBI), we may be able to re-check the information directly with the source, or we may need to refer you to the source to ask for a review
- If you ask to exercise any rights or make any choices, we will either do what you ask, tell you why we cannot, or help you find the right person or organization to ask. You can ask us:
 - for **information** about your personal information. You can ask if we have it, who we get it from, how we use it, where we store and access it, who we share it with, how long we keep it, and how we protect it when we share it across borders or between organizations
 - for a **copy** of your personal information
 - to **correct** your personal information if it is incorrect
 - To **add a comment** to your personal information if you want it to be clarified or if you disagree with us about whether it is correct
 - to **stop using** your personal information, either temporarily or permanently, for some or all purposes.
 - to **delete** your personal information
 - to **share** your personal information with another organization
- We do not discriminate against people when they make choices or exercise their rights, but certain choices might mean we cannot do something else you want us to do, like provide information or a perform service. We will explain the consequences of any choice you make
- If you are not happy with how your personal information has been collected, used, disclosed, or otherwise handled, you can [make a complaint](#) to us or to a regulatory or supervisory body

Are you in Quebec? If so, please see additional information [here](#).

There is more...

If you still have questions that we have not answered above, please continue to [The Details](#).

The Details

While [The Basics](#) set out our core commitments and key information about how we handle personal information, there are many other details you might want. We have organized these details into categories below.

[Types of personal information, sources, and purposes for collection](#)

[Online tracking and cookies](#)

[Access and disclosure](#)

[Notice and consent](#)

[Retention](#)

[Accuracy](#)

[Information security](#)

[International data transfers](#)

[Requests for personal information from public authorities](#)

Types of personal information, sources, and purposes for collection

Each table below tells you the types of personal information we collect, what we do with it, and where we get it from, based on [your relationship with us](#). Remember, you might fit into more than one of these categories. In addition to the ways that each type of personal information is used in these tables, personal information is also used for [service improvement and compliance](#) if allowed by law.

Some types of personal information have one or more letters next to them, [corresponding with the categories of personal information set out in California law](#).

You can find more information about the **lawful basis** for handling your personal information under European data protection laws [here](#).

We do not use your personal information for purposes other than the ones listed in this document or that you have been told about elsewhere, unless you would reasonably expect it or we are allowed or required to do so by law.

+ Candidates

Not all types of information are collected. We only collect what we need for the services our client asks for.

Type of information	What we do with it	Where we get it from
Name ^{A,B}	<ul style="list-style-type: none"> Identify you internally, with our clients, and with third parties involved in performing services 	<ul style="list-style-type: none"> You or our client
Other names you have used ^{A,B}	<ul style="list-style-type: none"> Look for background information related to your other name <p><i>If your name has been changed or corrected due to your gender identity, please contact us to help us complete services correctly while protecting your privacy</i></p>	<ul style="list-style-type: none"> You or our client Public records Publicly available media or social media Credit/consumer reporting agencies Third parties that we contact in the course of performing services
Date of birth ^{A,B,C}	<ul style="list-style-type: none"> Identify you internally, with our clients, and with third parties involved in performing services 	<ul style="list-style-type: none"> You or our client
Contact information ^{A,B} (including personal or business phone number, email address, and mailing address)	<ul style="list-style-type: none"> Communicate with you to complete services about you Comply with our legal obligations to contact you Allow you to exercise your privacy rights Connect you with other work or volunteer opportunities, if you ask us to 	<ul style="list-style-type: none"> You or our client

+ Candidates

Not all types of information are collected. We only collect what we need for the services our client asks for.

Type of information	What we do with it	Where we get it from
Address history ^{A,B}	<ul style="list-style-type: none"> Match you to background records 	<ul style="list-style-type: none"> You or our client Credit/consumer reporting agencies Public records
Documents to prove identity or address ^{A,B}	<ul style="list-style-type: none"> Verify your identity Request your personal information from sources 	<ul style="list-style-type: none"> You or our client
Sex or gender ^{A,B,C}	<ul style="list-style-type: none"> Complete services where the source requires us to ask for your sex or gender <p><i>If your legally recognized sex or gender has been changed or corrected, or if your identity is different from the sex or gender indicated on official documents, you are welcome to contact us to help us complete services correctly while protecting your privacy.</i></p>	<ul style="list-style-type: none"> You or our client
Government-issued identity numbers ^{A,B} (examples: Social Security Number, Social Insurance Number, National Insurance Number, driver's license number)	<ul style="list-style-type: none"> Verify your identity Verify your right to work or immigration status Get records from sources that use your government identity number to identify you 	<ul style="list-style-type: none"> You or our client
Biometric information ^E (examples: fingerprints, fingerprint geometry, facial geometry, photographs)	<ul style="list-style-type: none"> Check records that are identified by your fingerprints Verify your identity Create a profile or ID card with your picture 	<ul style="list-style-type: none"> You
Physical attributes ^{B,C,E} (examples: race, weight, eye color, hair color)	<ul style="list-style-type: none"> Validate that police or court records match your description 	<ul style="list-style-type: none"> You or our client
Criminal history, police records, and court records	<ul style="list-style-type: none"> Complete criminal, police and court record check or monitoring services 	<ul style="list-style-type: none"> You or our client Law enforcement or other government agencies Courts, court runners, or court data aggregators Credit/consumer reporting agencies Public records
Credit or bankruptcy history ^B	<ul style="list-style-type: none"> Complete credit or financial history services Verify your identity 	<ul style="list-style-type: none"> Credit/consumer reporting agencies Government agencies Public records
Employment history ^{B,I}	<ul style="list-style-type: none"> Verify your current or past employment Match you to your social media profiles 	<ul style="list-style-type: none"> You or our client Your current or past employers or their recordkeeping service providers Agencies that placed you with your current or past employers Publicly available media or social media References you have provided
Education history ^J	<ul style="list-style-type: none"> Verify your education Match you to your social media profiles 	<ul style="list-style-type: none"> You or our client Educational institutions you have attended or their recordkeeping service providers Government education authorities in jurisdictions where you have attended school Publicly available media or social media References you have provided
Volunteering history ^{B,I}	<ul style="list-style-type: none"> Verify your volunteering history Connect you to new volunteer opportunities, if you ask us to 	<ul style="list-style-type: none"> You or our client Organizations you have volunteered with or their recordkeeping service providers Publicly available media or social media References you have provided
Travel history	<ul style="list-style-type: none"> Verify your activities when you were not working or studying 	<ul style="list-style-type: none"> You or our client References you have provided

+ Candidates

Not all types of information are collected. We only collect what we need for the services our client asks for.

Type of information	What we do with it	Where we get it from
Professional credentials, designations, memberships, sanctions or reprimands ^{B,I}	<ul style="list-style-type: none"> Verify your professional standing, participation or completion of professional development courses Check or monitor for professional sanctions or reprimands 	<ul style="list-style-type: none"> You or our client Professional organizations with which you have been associated, or their recordkeeping service providers Public records Publicly available media or social media References you have provided
Opinions about you	<ul style="list-style-type: none"> Complete reference interviews 	<ul style="list-style-type: none"> You or our client Your current or past employers or their recordkeeping service providers Agencies that placed you with your current or past employers References you have provided
Appearance on government watch or sanctions lists	<ul style="list-style-type: none"> Check or monitor for presence on government watch or sanctions lists 	<ul style="list-style-type: none"> Law enforcement or other government agencies
Health information, including substance test results ^C	<ul style="list-style-type: none"> Test for substance use or other health conditions 	<ul style="list-style-type: none"> You or our client Substance testing laboratories that have taken a sample for this purpose Medical professionals that have seen you for this purpose
Eligibility to work ^{A,B,C}	<ul style="list-style-type: none"> Verify that you are allowed to work in a certain country 	<ul style="list-style-type: none"> You or our client Government agencies
Tax information ^{A,B}	<ul style="list-style-type: none"> Complete employment-related tax forms 	<ul style="list-style-type: none"> You or our client
Driving records	<ul style="list-style-type: none"> Check your driver's license validity and driving history 	<ul style="list-style-type: none"> You or our client Government agencies
Directorship and corporate governance history ^{B,I}	<ul style="list-style-type: none"> Verify your involvement with corporations as a director or officer 	<ul style="list-style-type: none"> You or our client Public records Publicly available media or social media Corporations with which you have had previous involvement
Place of birth ^C	<ul style="list-style-type: none"> Complete services where the source requires us to ask for your place of birth 	<ul style="list-style-type: none"> You or our client
Publicly available social media activities	<ul style="list-style-type: none"> Complete services involving social media checks 	<ul style="list-style-type: none"> Social media platforms
Mentions in online or print media	<ul style="list-style-type: none"> Complete services involving media checks 	<ul style="list-style-type: none"> Online and print media platforms
Other public record information	<ul style="list-style-type: none"> Complete other public record search or monitoring services 	<ul style="list-style-type: none"> You or our client Government agencies Public records
Telephone call recordings ^H	<ul style="list-style-type: none"> Ensure quality service, train our employees, and investigate complaints or problems 	<ul style="list-style-type: none"> You
Your opinions about us and our services	<ul style="list-style-type: none"> Measure and improve the quality of our service 	<ul style="list-style-type: none"> You
Skills and interests ^{C,I}	<ul style="list-style-type: none"> Help match you with volunteering or other relevant opportunities, if you ask us to 	<ul style="list-style-type: none"> You
Billing and payment card information ^B	<ul style="list-style-type: none"> Collect payment for services that our client requires you to pay for 	<ul style="list-style-type: none"> You
IP address when you use our candidate platform ^{A,F}	<ul style="list-style-type: none"> Maintain your session Determine your location Ensure security on our candidate platform 	<ul style="list-style-type: none"> Your device or internet service provider
Location when you use our candidate platform ^{F,G}	<ul style="list-style-type: none"> Provide an experience that is relevant to your location 	<ul style="list-style-type: none"> Your device or internet service provider
Login credentials for our candidate platform ^{A,F}	<ul style="list-style-type: none"> Authenticate you when you use our candidate platform 	<ul style="list-style-type: none"> You
Authentication information provided by a social media or cloud services platform ^{A,F}	<ul style="list-style-type: none"> Authenticate you when you choose to use those platforms to identify yourself to our system 	<ul style="list-style-type: none"> You Social media or cloud services platforms
Dates, times and length of session on our candidate platform ^F	<ul style="list-style-type: none"> Maintain your session Ensure security on our candidate platform 	<ul style="list-style-type: none"> Your device

+ Candidates

Not all types of information are collected. We only collect what we need for the services our client asks for.

Type of information	What we do with it	Where we get it from
Access to and modification of data on our candidate platform ^F	<ul style="list-style-type: none"> Keep records of what information was provided to us, when, and by whom Ensure security on our candidate platform 	<ul style="list-style-type: none"> You
Device and browser information when you use our candidate platform ^F	<ul style="list-style-type: none"> Make sure the experience on our candidate platform works for you 	<ul style="list-style-type: none"> Your device
Your behavior on our candidate platform ^F	<ul style="list-style-type: none"> Look for ways to improve the experience on our candidate platform 	<ul style="list-style-type: none"> You

+ Website visitors

Type of information	What we do with it	Where we get it from
Name ^{A,B}	<ul style="list-style-type: none"> Provide information you request Contact you to tell you more about our services 	<ul style="list-style-type: none"> You Companies that can match your behavior on our website to your information elsewhere
Job title and organization ^{B,I}	<ul style="list-style-type: none"> Provide information you request Contact you to tell you more about our services 	<ul style="list-style-type: none"> You Companies that can match your behavior on our website to your information elsewhere
Contact information ^{A,B} (examples: phone number, email address, mailing address)	<ul style="list-style-type: none"> Provide information you request Contact you to tell you more about our services 	<ul style="list-style-type: none"> You Companies that can match your behavior on our website to your information elsewhere
Registration or subscription preferences for webinars, whitepapers, newsletters or other content ^F	<ul style="list-style-type: none"> Provide information you request Contact you to tell you more about our services 	<ul style="list-style-type: none"> You
IP address ^{A,F}	<ul style="list-style-type: none"> Determine your location Ensure security on our websites Identify you or your employer 	<ul style="list-style-type: none"> Your device or internet service provider
Location ^{F,G}	<ul style="list-style-type: none"> Provide an experience that is relevant to your location 	<ul style="list-style-type: none"> Your device or internet service provider
Your behavior on our websites ^F	<ul style="list-style-type: none"> Look for ways to improve the experience on our websites Determine what you might be interested in 	<ul style="list-style-type: none"> You
Dates, times and length of session ^F	<ul style="list-style-type: none"> Look for ways to improve the experience on our websites Ensure security of our websites 	<ul style="list-style-type: none"> Your device
Device and browser information ^F	<ul style="list-style-type: none"> Make sure the experience on our websites works for you 	<ul style="list-style-type: none"> Your device

+ Clients

Type of information	What we do with it	Where we get it from
Name ^{A,B}	<ul style="list-style-type: none"> Connect you with the services you order Provide information you request Contact you about services you order Contact you to tell you more about our services 	<ul style="list-style-type: none"> You Another person at your organization

+ Clients		
Type of information	What we do with it	Where we get it from
Job title and organization ^{B,I}	<ul style="list-style-type: none"> Keep track of our different contacts within your organization Manage our relationship with your organization 	<ul style="list-style-type: none"> You Another person at your organization
Contact information ^{A,B} (examples: phone number, email address, mailing address)	<ul style="list-style-type: none"> Connect you with the services you order Provide information you request Contact you about services you order Tell you more about our services 	<ul style="list-style-type: none"> You Another person at your organization
Telephone call recordings ^H	<ul style="list-style-type: none"> Ensure quality service Train our employees Investigate complaints or problems 	<ul style="list-style-type: none"> You
Records of your use of our services ^D	<ul style="list-style-type: none"> Perform services for you Manage our relationship with you 	<ul style="list-style-type: none"> You
Records of email, chat and other communication with you, including whether you have read an email ^F	<ul style="list-style-type: none"> Perform services for you Manage our relationship with your organization Train our employees Ensure quality service Tell you more about our services 	<ul style="list-style-type: none"> You
Billing and payment card information ^B	<ul style="list-style-type: none"> Collect payment for services we have provided 	<ul style="list-style-type: none"> You
IP address when you use our client platform ^{A,F}	<ul style="list-style-type: none"> Maintain your session Determine your location Ensure security on our client platform 	<ul style="list-style-type: none"> Your device or internet service provider
Location when you use our client platform ^{F,G}	<ul style="list-style-type: none"> Provide an experience that is relevant to your location 	<ul style="list-style-type: none"> Your device or internet service provider
Login credentials for our client platform ^{A,F}	<ul style="list-style-type: none"> Authenticate you when you use our client platform 	<ul style="list-style-type: none"> You
Authentication information provided by a social media or cloud services platform ^{A,F}	<ul style="list-style-type: none"> Authenticate you when you choose to use those platforms to identify yourself to our system 	<ul style="list-style-type: none"> You Social media or cloud services platforms
Dates, times and length of session on our client platform ^F	<ul style="list-style-type: none"> Maintain your session Ensure security on our client platform 	<ul style="list-style-type: none"> Your device
Access to and modification of data on our client platform ^F	<ul style="list-style-type: none"> Keep records of what information was provided to us, when, and by whom Ensure security on our client platform 	<ul style="list-style-type: none"> You
Device and browser information when you use our client platform ^F	<ul style="list-style-type: none"> Make sure the experience on our client platform works for you 	<ul style="list-style-type: none"> Your device
Your behavior on our client platform ^F	<ul style="list-style-type: none"> Look for ways to improve the experience on our client platform Tell you relevant information about our services 	<ul style="list-style-type: none"> You
Your opinions about us and our services	<ul style="list-style-type: none"> Measure and improve the quality of our service 	<ul style="list-style-type: none"> You

+ Prospects

Type of information	What we do with it	Where we get it from
Name ^{A,B}	<ul style="list-style-type: none"> Provide information you request Contact you to tell you about our services 	<ul style="list-style-type: none"> You Companies that sell lists of professional contact information Your social media profiles Your company's website Other publicly available sources
Job title and organization ^{B,I}	<ul style="list-style-type: none"> Provide information you request Contact you to tell you about our services 	<ul style="list-style-type: none"> You Companies that sell lists of professional contact information Your social media profiles Your company's website Other publicly available sources
Contact information ^{A,B} (examples: phone number, email address, mailing address)	<ul style="list-style-type: none"> Provide information you request Contact you to tell you about our services 	<ul style="list-style-type: none"> You Companies that sell lists of professional contact information Your social media profiles Your company's website Other publicly available sources
Telephone call recordings ^H	<ul style="list-style-type: none"> Ensure quality service Train our employees Investigate complaints or problems 	<ul style="list-style-type: none"> You
Records of email, chat and other communication with you, including whether you have read an email ^F	<ul style="list-style-type: none"> Manage our relationship with your organization Train our employees Ensure quality service Tell you more about our services 	<ul style="list-style-type: none"> You

+ Sources

Type of information	What we do with it	Where we get it from
Name ^{A,B}	<ul style="list-style-type: none"> Communicate with you about a candidate Report information you provided to our client 	<ul style="list-style-type: none"> You A candidate who knows you Our client
Job title and organization ^{B,I}	<ul style="list-style-type: none"> Communicate with you about a candidate Understand your relationship with a candidate Report information you provided to our client 	<ul style="list-style-type: none"> You A candidate who knows you Our client
Contact information ^{A,B} (examples: phone number, email address)	<ul style="list-style-type: none"> Communicate with you about a candidate 	<ul style="list-style-type: none"> You A candidate who knows you Our client
Your relationship with a candidate ^{B,I}	<ul style="list-style-type: none"> Put information you provide about a candidate into context 	<ul style="list-style-type: none"> You A candidate who knows you Our client

Your opinions about a candidate	<ul style="list-style-type: none"> Report information you provided to our client 	<ul style="list-style-type: none"> You
Records of email, chat, and other communication with you ^F	<ul style="list-style-type: none"> Train our employees Ensure quality service 	<ul style="list-style-type: none"> You
Telephone call recordings ^H	<ul style="list-style-type: none"> Ensure quality service Train our employees Investigate complaints or problems 	<ul style="list-style-type: none"> You
Your opinions about your experience with us	<ul style="list-style-type: none"> Measure and improve the quality of our service 	<ul style="list-style-type: none"> You
IP address when you use our platform ^{A,F}	<ul style="list-style-type: none"> Maintain your session Determine your location Ensure security on our client platform 	<ul style="list-style-type: none"> Your device or internet service provider
Location when you use our platform ^{F,G}	<ul style="list-style-type: none"> Provide an experience that is relevant to your location 	<ul style="list-style-type: none"> Your device or internet service provider
Dates, times, and length of session on our platform ^F	<ul style="list-style-type: none"> Maintain your session Ensure security on our client platform 	<ul style="list-style-type: none"> Your device
Access to and modification of data on our platform ^F	<ul style="list-style-type: none"> Keep records of what information was provided to us, when, and by whom Ensure security on our client platform 	<ul style="list-style-type: none"> You
Device and browser information when you use our platform ^F	<ul style="list-style-type: none"> Make sure the experience on our client platform works for you 	<ul style="list-style-type: none"> Your device
Your behavior on our platform ^F	<ul style="list-style-type: none"> Look for ways to improve the experience on our client platform Tell you relevant information about our services 	<ul style="list-style-type: none"> You

+ Workers

Type of information	What we do with it	Where we get it from
Name ^{A,B}	<ul style="list-style-type: none"> Identify you 	<ul style="list-style-type: none"> You Someone you know who refers you to us
Contact information ^{A,B} (examples: phone number, email address, mailing address, residential address)	<ul style="list-style-type: none"> Communicate with you about working for Sterling 	<ul style="list-style-type: none"> You Someone you know who refers you to us
Interests and other personal characteristics you share with us ^C	<ul style="list-style-type: none"> Decide what kind of job you might want to do Associate you with other similar people who work for Sterling Provide support to you if you need it 	<ul style="list-style-type: none"> You
Professional background information ^{A,B,I,J} (examples: skills, education history, employment history, professional credentials, professional sanctions, other people's opinions about your work)	<ul style="list-style-type: none"> Decide if you have the right skills and background to work for us 	<ul style="list-style-type: none"> You Your current and former employers or their recordkeeping service providers Educational institutions where you have studied or their recordkeeping service providers Professional organizations or regulatory bodies or their recordkeeping service providers References you provide
Personal background and identity information ^{A,B,C,I,J} (examples: date of birth, place of birth, sex or gender, address history, criminal history, police and	<ul style="list-style-type: none"> Decide if your background or activities create any risks for the company or our clients Make sure you are allowed to work in the country where you are applying 	<ul style="list-style-type: none"> You Police, courts, and government agencies Credit/consumer reporting agencies

+ Workers		
Type of information	What we do with it	Where we get it from
court records, credit history, substance or health testing results, public social media activity, identity documents or numbers, appearance on government watch or sanctions lists, nationality, citizenship, or immigration status)		<ul style="list-style-type: none"> Substance testing labs or medical professionals that you have gone to as part of your work for Sterling Social media platforms Other publicly available sources
Information about protected class or characteristics, if you tell us about them <small>C</small> (examples: sex or gender, gender identity, race, ethnicity, sexual orientation, disability or health status, and others)	<ul style="list-style-type: none"> Run diversity and inclusion programs and affinity groups for workers Manage accommodations for different needs 	<ul style="list-style-type: none"> You
Attendance information ¹ (examples: hours worked, reasons for leave or tardiness, information about a medical condition, information about your family, information about a disability)	<ul style="list-style-type: none"> Manage staffing, hours and attendance Manage accommodations for different needs 	<ul style="list-style-type: none"> You Medical professionals you ask to speak with us Family members or other representatives you ask to speak with us
Information about workplace benefits, support, and health ^{A,B,C} (examples: medical information, substance test results, disability information, marital status, family information, transportation records, vehicle information, charitable donation information, professional development and education information, personal concerns or problems)	<ul style="list-style-type: none"> Manage benefits Provide support services to workers Maintain a healthy and substance-free workplace 	<ul style="list-style-type: none"> You Substance testing labs or medical professionals that you have gone to as part of your work for Sterling or that you have asked to speak to us Family members or other representatives you ask to speak with us Benefits providers
Tax and payroll information ^{A,B,C} (examples: identity documents, date of birth, government ID numbers, loan information, wage garnishment information, banking information, marital status, family information)	<ul style="list-style-type: none"> Make sure you get paid Report payroll and tax information to government authorities Pay taxes 	<ul style="list-style-type: none"> You Government agencies Courts
Network and equipment use information ^F (examples: access logs, IP address, login credentials, data access, internet browsing activities, email records, chat records, telephone calls, information about your home office, information about your mobile device, voicemails)	<ul style="list-style-type: none"> Make sure our systems are secure Investigate unusual or suspicious behavior Investigate suspected violations of company policy or the law 	<ul style="list-style-type: none"> You Your device
Information about your job performance, quality, and productivity ¹ (examples: computer and network activity, telephone call recordings, email and chat logs, performance appraisals, training records, corrective action records, assessments of quality and quantity of work done)	<ul style="list-style-type: none"> Manage individual, team and company performance, quality, and productivity 	<ul style="list-style-type: none"> You Monitoring of activities on our systems Your supervisor Other workers
Emergency contact information ^{A,B}	<ul style="list-style-type: none"> Communicate with you, your family or your friends in an emergency 	<ul style="list-style-type: none"> You
Your opinions and feedback about Sterling, your job, and other workers	<ul style="list-style-type: none"> Measure our performance as a workplace Improve the experience for our workers 	<ul style="list-style-type: none"> You
Biometric information ^E (examples: fingerprints, fingerprint geometry, hand geometry, face geometry, photographs)	<ul style="list-style-type: none"> Allow you to access our offices Allow you to track your working hours Provide you with a company ID card 	<ul style="list-style-type: none"> You

+ Workers		
Type of information	What we do with it	Where we get it from
Information about your personal belongings in our offices (examples: contents of bags or storage lockers)	<ul style="list-style-type: none"> Make sure our offices are secure 	<ul style="list-style-type: none"> You
Information about your activities in our offices ^H (examples: entry and exit records, security video and audio recordings)	<ul style="list-style-type: none"> Ensure our offices are secure Investigate unusual or suspicious behavior Investigate suspected violations of company policy or the law 	<ul style="list-style-type: none"> You Recording devices
Information collected as part of an investigation ^{D,F,G,H,I} (examples: activity on social media, in the news, or in public; information about interpersonal relationships; complaints or concerns voiced by others; internal and external communications)	<ul style="list-style-type: none"> Investigate suspected violations of company policy or the law 	<ul style="list-style-type: none"> You Social media platforms News outlets Remote monitoring Other workers, clients, or other relevant people

Service improvement and compliance

We constantly analyze our systems and services to make sure they work as well as possible. Whenever we can, we do this analysis with anonymous information, meaning identifiable information (for example, your name, date of birth, and government-issued identification numbers) is removed, but we also need to analyze identifiable information. Also, we have some legal obligations to ensure our systems are secure and our results are accurate. Finally, some sources audit us to make sure we are using information properly.

If the law and contracts with our clients allow it, we use personal information for these purposes:

- Watching system activity and data movement to make sure your personal information is secure
- Reviewing service fulfillment and results to make sure they have been done correctly
- Testing systems to make sure they work right and to find coding mistakes
- Making sure sources are providing us with consistent and accurate information
- Checking that our workers, service providers, and other people or organizations that help us operate are doing their work properly
- Looking for patterns, analyzing manual and automated business activities, and gathering other business information to help our people and our systems work faster, more accurately, and more efficiently in the future
- Allowing sources (like consumer and credit reporting agencies, courts, police services, government agencies, and others) to check that we are collecting and using information from them properly

Mergers and acquisitions

Like many industries, our industry undergoes a lot of changes. This means that we might buy other companies, or we might be bought by another company. We might also join together with other companies to create a new partnership or joint venture. When we do this, personal information from different companies might be mixed together. However, the commitments in this privacy statement remain the same. Any new company that has access to your personal information through merger, acquisition or joint venture activity will not use it for any new purposes.

Online tracking and cookies

When you use websites and read emails, information is created about your activities. This can be as simple as a log of your IP address accessing the website or an indication of whether you read an email, or it can be more complex, like step-by-step records of everywhere you have clicked and how long you have stayed on each page. Many websites save small files called “cookies” on your computer, so that the same website can recognize you as you move around the website

and when you come back in the future. There are a few websites that you can refer to for more information about how cookies work. We recommend <http://aboutcookies.org>.

To keep things easy to understand, we call cookies and other internet tracking technologies “trackers” throughout this section.

Sterling and other organizations we work with use trackers when you use our websites and read our emails. Depending on how you interact with us, these trackers serve different functions. When you access one of our websites for the first time, we show you a banner that allows you to see what kinds of trackers will be used on that website and what they do. Some trackers need to be on for functional reasons, but you might be able to turn off others. If you have choices about trackers, you can make those choices through that banner.

Our websites have trackers for the following reasons:

To allow our websites to work properly and securely.

+ Tell me more.

Our websites are complex and use a full range of technological capabilities, including security protocols. For these capabilities to operate correctly, the websites need to use trackers to maintain a secure connection with your computer. If these trackers are not in place, some parts of the website do not work, and we cannot secure your connection.

To customize the website experience for you and remember your preferences when you move around our websites or visit again in the future.

+ Tell me more.

You can make certain choices when you use our websites, like your country, your language, the size of the text on the screen, or other customizations. Our websites will also automatically adjust based on information provided by your device, like the type of device you are using, your browser, and your location. Sometimes, you can ask a secure login page to remember who you are to make it easier to log in the next time you visit. Sometimes we are required to gather and maintain this information to ensure our website is usable and comply with local laws where you are.

To understand who is visiting our websites or reading our emails, what they are looking at, and how we can improve their experience.

+ Tell me more.

Our electronic communications are only useful if they give our website visitors, clients, candidates, sources, and workers what they are looking for. To be sure of that, we use trackers to see how many people look at our websites or emails, which parts they look at most (and least), how much time they spend on average on each page, and what they are doing when they get stuck or stop using the website. We use this information in aggregate form (meaning we cannot tell who you are) to understand trends that help us improve our online interactions with people. We might also use it to improve our interactions with you. For example, if we can tell that you never open our emails, we might stop sending them to you. Also, if you are a client, candidate, source, or worker and you report a technical problem, we might look at a log of what you have done to help us solve the problem.

To target our sales, marketing, and advertising efforts to the right people and allow advertising and social media platforms to see what you do on our websites.

+ Tell me more.

If you are a website visitor or a client, we (along with our social media and advertising partners) use trackers to attempt to identify you or the organization you work for using publicly available information, or associate you with your profiles on social media and advertising platforms. This helps us and our partners better understand who you are to ensure that sales, marketing, and advertising efforts are relevant, targeted, and effective. If you interact with us as a candidate or a source, we do not use trackers for this purpose and will not use your personal information for sales, marketing, or advertising.

Access and disclosure

Each table below tells you the people and organizations that might have access to your personal information (or to whom we might disclose your information) based on [your relationship with us](#). Remember, you might fit into more than one of these categories.

When a person or an organization works on our behalf to store data, maintain our systems, or help us perform services, we only choose people or organizations that will protect your personal information appropriately and use it only the way we ask them to. We require these partners and service providers to make that commitment through a contract.

+ Candidates and sources

Who has access	What information do they get	What do they do with it
Sterling's client support, service fulfillment, finance, compliance, privacy, information technology, and data analytics teams	<ul style="list-style-type: none"> All personal information 	<ul style="list-style-type: none"> Communicate with you and our client about our services Fulfill and collect payment for services Maintain our systems Analyze our business activities Comply with our legal obligations
Our client	<ul style="list-style-type: none"> All personal information collected when we provide services to that client 	<ul style="list-style-type: none"> Determined by our client
Organizations you ask us to share your information with	<ul style="list-style-type: none"> The information you ask us to share 	<ul style="list-style-type: none"> Determined by the recipient organization
Data storage and processing providers	<ul style="list-style-type: none"> All personal information in our custody 	<ul style="list-style-type: none"> Store, carry out automated tasks on, and provide access to, data
Technology support providers	<ul style="list-style-type: none"> Personal information in our custody with which we require technical support 	<ul style="list-style-type: none"> Provide technical assistance in developing and using our systems
Other companies that provide services similar to ours	<ul style="list-style-type: none"> Personal information required to complete services 	<ul style="list-style-type: none"> Provide services we cannot complete due to geographic, linguistic, or technical limitations Provide services when we need help to handle overflow volume
Court researchers	<ul style="list-style-type: none"> Name Date of birth Government-issued identifiers Address history Other information required to complete court research Court records 	<ul style="list-style-type: none"> Retrieve and report court records

+ Candidates and sources		
Who has access	What information do they get	What do they do with it
Drug and health testing sites and labs	<ul style="list-style-type: none"> Name Date of birth Government-issued identifiers Other information required to complete drug and health testing Health information, including test results 	<ul style="list-style-type: none"> Collect and test biological specimens for drugs or other health-related purposes
Local police services and national criminal record checking authorities like the Australian Criminal Intelligence Commission, the UK Disclosure and Barring Service, the Royal Canadian Mounted Police, or the Federal Bureau of Investigation	<ul style="list-style-type: none"> Name Date of birth Government-issued identifiers Address history Other information required to complete police record searches Police records Fingerprints or other biometric identifiers (images or geometry) 	<ul style="list-style-type: none"> Conduct police record checks Conduct law enforcement duties
Biometric collection or transmission services	<ul style="list-style-type: none"> Fingerprints or other biometric identifiers (images or geometry) Name Address Date of birth Government-issued identifiers Professional license numbers Physical characteristics Reasons for a request for services 	<ul style="list-style-type: none"> Conduct fingerprint-based public record checks
Translation services	<ul style="list-style-type: none"> Personal information we have received in a language our workers cannot understand 	<ul style="list-style-type: none"> Translate documents or information Provide services in the language required by our client
Survey services	<ul style="list-style-type: none"> Name Contact information Opinions about our services 	<ul style="list-style-type: none"> Conduct surveys
Credit card processing services	<ul style="list-style-type: none"> Billing and payment card information 	<ul style="list-style-type: none"> Process payment for services

+ Website visitors, clients, and prospects		
Who has access	What information do they get	What do they do with it
Sterling's marketing and sales teams	<ul style="list-style-type: none"> All personal information 	<ul style="list-style-type: none"> Develop and carry out our marketing and sales activities
Marketing analytics, communications, and data aggregation providers	<ul style="list-style-type: none"> IP address and location Web browsing behavior Information entered in contact forms on marketing websites 	<ul style="list-style-type: none"> Analyze the use of our marketing websites to provide a better and more relevant user experience Identify users to target marketing and sales activities Manage marketing communications

Advertising and social media partners	<ul style="list-style-type: none"> Name Job title and employer Contact information 	<ul style="list-style-type: none"> Deliver targeted marketing and advertising to you
Data storage and processing providers	<ul style="list-style-type: none"> All personal information 	<ul style="list-style-type: none"> Store, carry out automated tasks on, and provide access to, data
Technology support providers	<ul style="list-style-type: none"> Personal information with which we need technical support 	<ul style="list-style-type: none"> Provide technical assistance in developing and using our systems
Survey services	<ul style="list-style-type: none"> Name Contact information Opinions about our services 	<ul style="list-style-type: none"> Conduct surveys

+ Workers

Who has access	What information do they get	What do they do with it
Sterling's human resources, finance, and executive teams, and your direct and indirect supervisors	<ul style="list-style-type: none"> All personal information 	<ul style="list-style-type: none"> Manage all aspects of Sterling's relationship with you
Recruiting companies	<ul style="list-style-type: none"> Name Contact information Employment, education and other professional background information 	<ul style="list-style-type: none"> Help you become a Sterling worker
Payroll providers	<ul style="list-style-type: none"> Name Government identifiers Tax information Banking information Hours worked Wage/salary Other payroll- and tax-related information 	<ul style="list-style-type: none"> Ensure payment of wages/salary and related taxes and fees
Data storage, processing and delivery providers, including data centers/cloud providers, applicant tracking systems, recruiting systems, human resources information systems, and others	<ul style="list-style-type: none"> All personal information 	<ul style="list-style-type: none"> Store, carry out automated tasks on, and provide access to, data
Technology support providers	<ul style="list-style-type: none"> Personal information with which we need technical support 	<ul style="list-style-type: none"> Provide technical support
Organizations involved in background screening (see the table for "candidates" above)	<ul style="list-style-type: none"> Personal information required to complete background checks (see the table for "candidates" here) 	<ul style="list-style-type: none"> Background screening
Benefits providers, including healthcare providers, financial institutions, and others	<ul style="list-style-type: none"> Identifying information Health information Information about family members Financial information Other information required to provide benefits 	<ul style="list-style-type: none"> Provision of benefits, including health plans, retirement plans, and support services
Survey services	<ul style="list-style-type: none"> Name Department Job title 	<ul style="list-style-type: none"> Conduct surveys

+ Workers		
Who has access	What information do they get	What do they do with it
	<ul style="list-style-type: none"> Contact information Opinions about Sterling 	

Notice and consent

When we collect and use your personal information, you are almost always notified beforehand. There might be a brief notice provided to you right when your information is collected, or you may be asked to view this document, or both.

Depending on our relationship with you, we may notify you or someone else may notify you about the collection of your personal information:

- If you are a **candidate**, our client will usually notify you either by providing you with a paper notice or disclosure, or by sending you an invitation through our platform which contains information about your privacy and a link to this document. If you request services for yourself, you will be given information about the services and a link to this document before you submit your request
- If you are a **source**, you can visit our website and follow a link to this document when we contact you about using you as a source. If your information is provided by a candidate, that candidate should tell you that they are providing your personal information
- If you are a **website visitor** or **client**, you can follow a link to this document when you visit our website or log into our client portal
- If you are a **prospect**, you can visit our website and follow a link to this document after we first make contact, or you can ask the person you speak with to provide more information about your privacy
- If you are a **worker**, you will be provided a link to this document when you first apply to work for us, and you can follow a link to this document through our internal or external websites at any time afterwards

Sometimes, notice is not given before your personal information is collected. This is rare, but may happen in the following circumstances:

- You are a **source** and the candidate does not tell you that they are providing your personal information. We will contact you shortly after we have received your contact information
- You are a **prospect** and we contact you through publicly available channels
- You are a **candidate** for certain types of due diligence investigations and our client has determined that the investigation can be done without notice to you

You must provide consent or authorization for some of the things we do with your personal information. That can be expressed by many actions, including by signing a form, checking a box, or simply providing your personal information after being told how it will be used. Many of the things we do with your personal information do not require your consent, though, because you do not really have a choice (for example, if a certain activity involving your personal information is required by law or required for employment) or because asking for your consent would defeat the purpose (for example, if we are conducting an investigation into suspected workplace policy violation). If you want to know whether you have consented to the collection and handling of your personal information, or if you want to withdraw your consent, please [contact us](#) and we will explain your options.

Retention

We keep personal information long enough to meet our and our clients' contractual, legal, and business needs. Once we no longer need your personal information, it is deleted or anonymized, meaning you can no longer be identified from any remaining information. To delete data, we de-index it from our databases and overwrite it with new information. There are many factors that go into deciding how long to keep personal information. Our general retention guidelines are as follows:

- If you are a **candidate or source** in the United States or Canada, we usually need to keep your personal information for at least six years to comply with our legal and contractual obligations. If you are in another country, we may only

need to keep your personal information for a few months so we can fulfill the services and collect payment for them, but sometimes we might need to keep it longer because of the type of information we collected about you or where we collected it from. Also, our clients use our system to keep records of all the services they have requested, so they might need us to keep your personal information longer. We do not delete personal information collected on behalf of our client until our client asks us to delete it

- If you are a **candidate having fingerprint collection or screening done with Sterling Identity**, we keep fingerprints and criminal history information for no more than 29 days. After that, they are deleted. We are required to retain certain information about your fingerprint screening for one to three years for compliance with FBI audit requirements. Beyond that, we keep personal information in active accounts for seven years, after which it is anonymized. If your account is inactive, we anonymize your personal information three years after your last login
- If you are a **candidate having a national coordinated criminal history check done in Australia**, we do not keep the results of that check for more than 12 months, and we keep the information you submitted for us to complete the check for no less than 12 months and no more than 18 months
- If you are a **candidate and we receive a UK criminal disclosure certificate about you**, we do not keep the certificate for more than six months

To find out how long personal information is retained in your case, [contact us](#) and we will let you know or tell you how to find out.

Accuracy

Much of the personal information we collect comes directly from you, so you control if it is accurate or not. When we collect personal information from sources, the source is responsible for making sure it is accurate. No matter how we collect your personal information, we correct it if we find out it is inaccurate, either because you told us it was inaccurate, or we discovered it was inaccurate through regular quality control checks. To ask for correction of your personal information, [contact us](#).

Information security

We have advanced security measures to secure and protect your personal information, such as internal and external firewalls, monitoring and alert systems to prevent and detect hackers, and 128-bit encryption of data in transit and at rest. Our servers are in secure locations that are carefully monitored and audited. Most of our employees access personal information only through secure virtual desktop interfaces, and our online interfaces are encrypted, password-protected, and monitored.

We have rigorous physical security policies to prevent unauthorized physical access to our offices. Our servers and offices, including electronic storage and paper documents containing personal information, are kept in access-controlled and monitored environments.

When we collect and communicate personal information outside of Sterling, we take care to do so through secure connections (like an SSL web connection or through a direct electronic integration) whenever possible. If we cannot exchange personal information that way because of technological limitations, we exceptionally collect and communicate personal information by phone, fax, postal mail, or email. If we have asked you to provide your personal information and you are not comfortable with the way you have been asked to provide it, [contact us](#) and we will provide an alternate method.

All our employees have been background checked and have taken security and privacy training courses. Our workers are only permitted to access your personal information if they need it to do their work.

Our contracts with service providers require them to protect your personal information properly and allow us to monitor them to be sure they do.

These information security practices are the same in all our offices around the world. Your personal information is protected to the same level whenever it is with Sterling, no matter where it goes.

International data transfers

Almost all the personal information we have is stored in data centers or with cloud providers in Canada, the European Union, Singapore, or the United States. A small amount of personal information is also stored in our offices around the world, including personal information about our workers, personal information that we have sent or received by mail or courier service, and information that is subject to special local rules. Our offices are in Australia, Canada, China, Hong Kong, India, Malaysia, Mexico, the Netherlands, the Philippines, Poland, Singapore, the United Arab Emirates, the United Kingdom, and the United States. We also have some workers who work remotely in other countries.

Any of [the types of information we collect](#) may be handled in any of the countries where we operate, for any of the purposes we collect personal information. The [people and organizations who access personal information](#) may be located anywhere in the world. Where your personal information is stored and accessed depends on why we have it and which part of our organization is using it. The following are general guidelines about where personal information is most frequently stored and accessed:

- If you are engaging with our [United States companies](#) (Sterling, Sterling Volunteers, Sterling Diligence, or Sterling NOW), then personal information will primarily be stored in the United States and processed in the European Union, India, Mexico, the Philippines, and the United States
- If you are engaging with **Sterling Identity** for fingerprinting services, your personal information is stored and accessed in the United States only
- If you are engaging with our [Canadian company](#) (Sterling Backcheck and myBackCheck.com), then personal information will primarily be stored in Canada and the United States and processed in Canada, the European Union, India, Mexico, the Philippines, and the United States
- If you are engaging with our [Europe, Middle East, and Africa companies](#) (Sterling EMEA), then personal information will primarily be stored in Canada or the United States and processed in the European Union, India, the Philippines, the United Arab Emirates, the United Kingdom, and the United States
- If you are engaging with our [Asia-Pacific companies](#) (Sterling RISQ and National Crime Check), then personal information will primarily be stored in Australia, Singapore, and the United States and processed in Australia, China, Hong Kong, Malaysia, the Philippines, Singapore, and the United States
- If you are undergoing an **Australian national coordinated criminal history check**, your personal information will be stored in Singapore and processed in Australia, Malaysia, the Philippines, and Singapore

If we are asked to collect information about you from sources outside of a country where we are located or using a language we do not know, your personal information might be stored and accessed from additional countries.

[We follow European rules for protecting cross-border transfers](#) of personal information, including by being Privacy Shield certified.

Personal information disclosure: United States or overseas

When Sterling is acting as an Investigative Consumer Reporting Agency under California state law, personal information collected from candidates in the United States may be transferred outside of the United States as follows:

- To Sterling's affiliate operations centers in the Philippines and India for service fulfillment
- To Sterling's information technology service providers in Canada, Singapore and the European Union if needed to transfer personal information between the United States and our affiliates around the world
- To third parties from which personal information must be collected or verified to fulfill services requested by our client (for example, if our client asks for a criminal record check in Brazil, personal information will be transferred to the organization in Brazil that provides police certificates)
- To our affiliates, partners or service providers that provide country- or region-specific services, where our client has requested those services (for example, if our client asks for an education verification in Japan, personal information may be transferred to a company in Asia with expertise in verifying Japanese education history in the Japanese language)

Risks of international data transfers

No matter where we store or access your personal information, we protect it to the same high standard and your rights remain the same. This means that if we handle personal information in a country with weaker privacy and data protection laws than what would usually apply, we still follow the stricter laws. However, if local laws in a different country apply to your personal information, then local authorities in that country (like courts, police, or the government) might be able to demand access to personal information. This is very unlikely to happen, but if it does, we [carefully consider our response](#) before providing information to public authorities and always take your interests into account.

Requests for personal information from public authorities

Law enforcement agencies, national security agencies, courts, or other public bodies in any jurisdiction where we are subject to the law may ask us for personal information, no matter where it is stored. If we get a production order, warrant, subpoena, or other enforceable demand, we will comply as required by law. If we get a request by a public authority to provide information voluntarily, we will consider your interests, our business interests, the interests of our clients, public safety implications, and our legal obligations before we decide whether to communicate personal information. If the personal information was collected from or on behalf of a client, we will consult with the client before proceeding if allowed by law.

We may decide to share personal information with law enforcement or other third parties proactively if necessary to investigate or report a violation of the law or a contractual agreement, if allowed by law.

For the experts

There are some things that we are required to say by law, but that are difficult to understand for someone who is not an expert. Instead of making it harder to read about privacy by mixing those things into The Basics and The Details, we have added a section called [The Legal and Technical Stuff](#) for the people who are really interested. Lawyers, regulators, and privacy geeks, this is for you!

The Legal and Technical Stuff

[Sterling companies](#)

- Americas
- Europe, Middle East and Africa
- Asia-Pacific

[Information for people in Europe \(EU/EEA, UK, Switzerland\)](#)

- [The GDPR and other European data protection laws](#)
- [Controllers and processors](#)
- [Lawful basis for processing personal information](#)
- [Additional conditions for processing special categories of personal information](#)
- [Cross-border data transfers, including Privacy Shield](#)
- [Automated decision making and profiling](#)

[Information for people in California](#)

- [The California Consumer Privacy Act](#)
- [Businesses and service providers](#)
- [Sale of personal information](#)
- [Categories and disclosure of personal information](#)

Sterling companies

Sterling is a global company with operations in several countries and under several brand names. The following tables identify each local Sterling entity. No matter which Sterling company you have engaged with, you are welcome to contact the one closest to where you live, and they will help you find what you need.

+ Americas		
Legal name	Doing business as	Address
Sterling Infosystems Inc. (USA)	Sterling Sterling Volunteers Talentwise ESIQ Verified Person Sterling Talent Solutions	6150 Oak Tree Boulevard, Suite 490 Independence, Ohio 44131 USA
Bishops Services LLC (USA)	Sterling Diligence	6150 Oak Tree Boulevard, Suite 490 Independence, Ohio 44131 USA
STS SID LLC (USA)	Sterling Identity	10220 SW Greenburg Road Portland OR 97223 USA
Sterling Backcheck Canada Corp.	Sterling Backcheck	200-19433 96 Avenue Surrey, BC V4N 4C4 Canada
A-Check America, LLC	A-Check	6150 Oak Tree Boulevard, Suite 490 Independence, Ohio 44131 USA
Employment Background Investigations, LLC	EBI	6150 Oak Tree Boulevard, Suite 490 Independence, Ohio 44131 USA

+ Europe, Middle East, and Africa		
Legal name	Doing business as	Address

Sterling (EMEA) Limited (United Kingdom) ICO Registration Number: Z9745943	Sterling Sterling's global representative in the United Kingdom	Suite 6, Axis 2 Business Centre, Axis Court Swansea Vale, Swansea, SA7 0AJ United Kingdom
Sterling EMEA BV (Netherlands)	Sterling Sterling's global representative in the European Union	Weesperstraat 61, kantoor 105 1018 VN Amsterdam, Netherlands
Sterling sp. z o.o. (Poland)	<i>Service provider for other Sterling businesses</i>	ul. Marii-Curie-Skłodowskiej 12 50-381 Wrocław, Poland

+ Asia-Pacific		
Legal name	Doing business as	Address
Sterling Information Resources India Private Limited	<i>Service provider for other Sterling businesses</i>	9 th Floor, G-Corp Tech Park, Kasarvadavli, Ghodbunder Road, Thane (West), 400615 Maharashtra, India
Sterling Talent Solutions Philippines Inc.	<i>Service provider for other Sterling businesses</i>	The Curve Building, 3 rd Avenue Corner 32 nd Street, 23 rd Floor, Bonifacio Global City (BGC), Taguig City 1634, Manila, Philippines
AIM Screening Pty Ltd (Australia)	Sterling RISQ	Suite 902, Level 9, 50 Berry Street North Sydney 2060 NSW Australia
AIM Screening (M) Sdn Bhd (Malaysia)	Sterling RISQ	W307/W308, Level 3, West Tower, Wisma Consplant 1, No. 7, Jalan SS16/14 7500 Subang Jaya, Selangor, Darul Ehsan, Malaysia
AIM Screening Pte Ltd (Singapore)	Sterling RISQ	101 Thomson Road, #10-1 United Square, Singapore 307591
AIM Screening Limited (Hong Kong)	Sterling RISQ	Unit C, 11/F, On Hing Building, 1 On Hing Terrace, Central, Hong Kong
RISQ Group Management Consulting Co Ltd (China)	Sterling RISQ	1508. Bldg.B, Jia Tai International Tower, No.41 East Fourth Ring Middle Rd, Chaoyang District, Beijing, China 100025
National Crime Check Pty Ltd (Australia)	National Crime Check	100 Jude Lane, Kent Town, South Australia 5067, Australia

Information for people in Europe (EEA, UK, and Switzerland)

The GDPR and other European data protection laws

Data protection laws in the European Economic Area (EEA) — which includes the European Union (EU) — as well as data protection laws in the United Kingdom (UK), Switzerland, and some other European countries, apply to some of the personal information that Sterling handles. Usually, this is because the data [controller](#) is located in Europe (no matter where you are located) or is offering you a product or service and you are located in Europe.

European data protection laws will not necessarily apply to your personal information just because you are in Europe or you have European citizenship. European data protection laws probably apply to your personal information if:

- You are a client, prospect, or website visitor located in Europe
- You are a candidate located in Europe and you have requested services about yourself
- You are a candidate or source and we are performing services for an organization located in Europe
- You are a worker for a Sterling company in Europe

Even if you are located in Europe, European data protection laws probably do not apply to your personal information if:

- You are a client, prospect, or website visitor looking for Sterling services that are not related to Europe (for example, you are looking for background screening services to support your company's United States locations)
- You are a candidate and you are requesting services for yourself that are not related to Europe (for example, a Canadian or Australian online criminal record check)
- You are a candidate or source and we are performing services for an organization located outside Europe
- You are a worker for a Sterling company outside Europe

For more information about what laws we apply to your personal information, [contact us](#).

Controllers and processors

Under data protection laws in EEA and EU member states, as well as the UK, Switzerland, and some other European countries, there is a distinction between “controllers” and “processors” of personal information. Controllers determine the purposes and means of collecting and handling personal information, and processors collect and handle personal information on behalf of controllers, only following the controllers’ instructions and the law and not making their own decisions about what to do with personal information. You can find more information about controllers and processors [here](#).

When the GDPR or other European laws apply, Sterling is sometimes a controller and sometimes a processor. When we collect and use personal information of **workers, clients, prospects, and website visitors**, we are always a controller. When we collect and use personal information of **candidates and sources**, we are sometimes a controller and sometimes a processor.

When we are a controller, we are responsible for all aspects of compliance with European privacy and data protection laws and you can generally exercise any of your rights directly with us. We sometimes share these responsibilities with another organization (usually our client) but we are still accountable for what we do with personal information.

When we are a processor, we are responsible for securing and protecting personal information in our custody, reporting any requests or problems to the controller (usually our client), and following that controller’s instructions. We cannot decide whether it is appropriate to collect your personal information or how or whether you can exercise your rights.

The difference does not usually matter much to you, but sometimes it will affect our ability to make decisions about your personal information. For example, if we are a processor, we might not be able to decide whether to give you a copy of your personal information or delete your personal information; the controller will have to decide. We also might not be able to take personal information that we collected for one client and share it with another client. If you contact us and we cannot do what you ask because we are a processor, we will explain that to you and contact the controller (usually our client) to make sure your request gets to the right place.

Lawful basis for processing personal information

Under data protection laws in EEA and EU member states, as well as the UK, Switzerland, and other European countries, there must be a “lawful basis” for collecting and handling your personal information. You can find more about the different options that organizations can choose as a lawful basis [here](#). Sometimes, additional conditions must be met when we collect “[special categories](#)” of personal information, or information about criminal convictions.

Each of the following is a lawful basis for processing personal information under European law:

- **Contract** means we need to handle your personal information to fulfill our duties under a contract with you
- **Consent** means you have made a free and informed choice to allow us to handle your personal information. When we rely on your consent to process your personal information, you may withdraw that consent any time
- **Legal obligation** means we are required by law to handle your personal information
- **Vital interests** means handling your personal information is necessary to protect someone’s life
- **Legitimate interests** means handling your personal information is necessary to meet our, our client’s, or someone else’s reasonable business needs while balancing those needs with the protection of your own interests and rights

Each table below indicates the lawful basis for each personal information processing activity, depending on [your relationship with us](#).

+ Candidates and sources

Processing activity	Lawful basis
Performing and collecting payment for services requested by you	Contract
Performing and collecting payment for services requested by our client, which may include handling special categories of personal information or criminal history	Legitimate interests of our client or another lawful basis established by our client
Complying with audit, retention and other obligations imposed by the third-party source of personal information	Legal obligation in Europe, our legitimate interest to comply with a legal obligation outside of Europe, or the third-party source's legitimate interest to ensure proper use of personal information it holds
Carrying forward past service results and using them to complete services for a different client	Our, your, and our client's legitimate interest to perform services quickly and accurately
Collecting your opinions about our services	Consent
Sending you legally mandated notices about our services and your personal information	Legal obligation
Recording and reviewing telephone calls and other communications	Our and our client's legitimate interest to maintain service quality
Ensuring our systems are secure	Legal obligation
Analyzing and improving our services	Our legitimate interest to understand how our business works and operate quickly, efficiently, and accurately

+ Website visitors, clients, and prospects

Processing activity	Lawful basis
Contacting you about services you have requested or changes to the way we perform services	Contract
Contacting you to provide information you have asked for or subscribed to	Consent
Determining whether you might be interested in our services, and contacting you to market or sell our services	Our legitimate interest to market and sell our services
Sending you legally mandated notices	Legal obligation
Recording and reviewing telephone calls and other communications	Our legitimate interest to maintain service quality
Tracking your online activity	Our legitimate interests to maintain high-quality websites and market and sell our services

+ Workers

Processing activity	Lawful basis
Collecting and reviewing your application for employment	Consent
Conducting an interview, confirming your qualifications and background, including criminal history, other sanctions, and publicly available social media content	Our legitimate interests to hire high-quality workers and protect our assets and reputation

Paying your wages or salary	Contract
Deducting and paying income taxes and other payroll-related activities	Legal obligation
Providing health and pension benefits	Legal obligation
Accommodating sickness, disability, and pregnancy	Legal obligation
Maintaining workplace health and safety	Legal obligation
Monitoring your activities on our networks and in our offices for security	Legal obligation
Monitoring and evaluating your attendance, work activities, policy adherence, and job performance	Our legitimate interests to perform business functions efficiently and effectively, and protect our assets and reputation
Investigating allegations of improper behavior	Our legitimate interests to enforce our organizational policies and protect our assets and reputation
Collecting and analyzing your opinions about Sterling	Our legitimate interest to promote a happy workforce
Maintaining emergency contact information	Vital interests

Additional conditions for processing special categories of personal information and criminal convictions

Under data protection laws in in EEA and EU member states, or the UK, Switzerland, and other European countries, certain types of personal information require additional conditions to be met beyond a lawful basis. These include:

- racial or ethnic origin
- political opinions
- religious or philosophical beliefs
- trade union membership
- genetic data
- biometric data
- data concerning health
- data concerning sex life or sexual orientation
- criminal convictions and offenses or related security measures

If you are a **candidate and we are performing services requested by our client**, and the services require us to handle one or more of these types of personal information, our client must make sure the appropriate conditions are met for processing these types of personal information.

If you are a **candidate and we are performing services requested by you**, we process these types of personal information based on your consent.

We do not collect or handle any of these types of personal information about our **clients, prospects, or website visitors**.

If you are a **worker** in a European country:

- We might collect information about your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, sex life, or sexual orientation in our day-to-day interactions with you if you have manifestly made the information public (for example, by posting about it publicly on a social media platform or speaking about it to the press) or if you have decided of your own accord to share it with us (for example, by providing us with the name and contact information of your spouse or domestic partner). We do not ask you to provide this information, we avoid collecting it wherever possible, and we do not collect it if it is prohibited by law where you work
- We might collect your racial or ethnic origin to promote and assess workplace diversity and equal opportunity. If we do, the collection of this information is optional and only done where we have permission to do so under local employment laws in the country where you work and have appropriate policy documents controlling how the information is used

- We collect information about your health to comply with our obligations under employment laws (for example, to accommodate a disability, health condition, or pregnancy), or to protect public health (for example, by monitoring workplace health during an outbreak of sickness)
- We collect information about criminal convictions and offenses or related security measures as part of some pre-employment background checks:
 - In the United Kingdom, we do this based on the substantial public interest to prevent or detect unlawful acts, subject to appropriate policy documents controlling how the information is used
 - In the Netherlands, we do this based on our right under Dutch law to assess your application to work for us and protect our interests by preventing the commission of criminal acts against us or other workers
 - In Poland, we do not collect this type of information about our workers
- We do not collect your genetic or biometric information, as those are defined in European data protection laws

Cross-border data transfers, including Privacy Shield

If your personal information is subject to data protection laws in EEA and EU member states, or the UK, Switzerland, or some other European countries, it may be transferred outside of the relevant jurisdiction based on one or more of the following legal mechanisms:

- Relevant authorities have decided that your personal information will be protected adequately once it is transferred. [These countries and sectors](#) have been deemed to be adequate by European Authorities
- We, our client, or a third-party partner or service provider have signed contractual clauses with the recipient of personal information that relevant authorities have deemed to ensure adequate protection of personal information
- We, our client, or a third-party partner or service provider has binding corporate rules within their corporate group that relevant authorities have deemed to ensure adequate protection of personal information
- You have provided your consent for us to transfer data to allow us to carry out services for you or on behalf of a client

[Contact us](#) for more information about the legal mechanism for transfer of your personal information, and to see copies of safeguards that have been used for that transfer, if applicable.

Sterling Infosystems Inc. and its US affiliates and subsidiaries operating under the brand name of Sterling (listed below under “Privacy Shield Covered Entities”) comply with the EU-US and Swiss-US Privacy Shield Frameworks as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information transferred from the EU, Switzerland, and UK to the United States. Sterling has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. Sterling remains responsible for [personal information that is communicated to third parties](#) for processing. If there is any conflict between this statement and the Privacy Shield Principles, the Privacy Shield Principles will prevail. To learn more about the Privacy Shield program and to view our certification, please visit <https://www.privacyshield.gov>. In compliance with the Privacy Shield Principles, Sterling commits to resolve complaints about our collection or use of your personal information. EU and Swiss individuals with inquiries or complaints regarding the handling of personal information under the Privacy Shield should first contact us. The Federal Trade Commission has jurisdiction over Sterling’s compliance with Privacy Shield. We commit to cooperating with the EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC), and comply with the advice given by the DPAs and the FDPIC with regard to personal information transferred from the EU, Switzerland, or the UK. We may also be subject to the investigatory and enforcement powers of the Federal Trade Commission. In some circumstances, you may be able to invoke binding arbitration to resolve your complaint where your personal information has been transferred to and processed in the United States.

While the Privacy Shield framework is no longer considered an adequate mechanism for transferring personal information from the EU to the United States, it is still in place and Sterling still complies with its principles. You can still exercise any rights you may have under the Privacy Shield framework.

Privacy Shield Covered Entities

- Bishops Services, LLC d/b/a Sterling Diligence
- Sterling Infosystems Inc. d/b/a ESIQ
- Sterling Infosystems Inc. d/b/a Sterling
- Sterling Infosystems Inc. d/b/a Sterling Talent Solutions
- Sterling Infosystems Inc. d/b/a Talentwise

- Sterling Infosystems Inc. d/b/a Verified Person
- Sterling Infosystems Inc. d/b/a Verified Volunteers
- Sterling Infosystems Inc. d/b/a Sterling Volunteers
- STS SID LLC d/b/a SureID
- Employment Background Investigations, LLC

Automated decision making and profiling

Sterling does not use automated means to evaluate or profile you or make decisions about you which have legal effects or otherwise significantly affect you. Our clients may use our services to make decisions about you. We do not know how our clients make decisions based on our services.

We may use automated means to gather or validate information about you. You can contact us to dispute any personal information that you believe is incorrect, whether or not it was gathered automatically.

Information for people in California

The California Consumer Privacy Act

The California Consumer Privacy Act (CCPA) is a law that protects the personal information of people in California. However, it only applies to some personal information, because other information is protected by other laws. Some or all of the protections and requirements in the CCPA may apply to your personal information in the following circumstances:

- You are a client, prospect, or website visitor and you live in California
- You are a worker in California
- You are a candidate or a source for a service that does not involve background checks (for example, onboarding or I-9 forms, fingerprinting services, or investment due diligence services)

The CCPA probably does not apply to your personal information in the following circumstances:

- You do not live in California (laws in your state will apply to your personal information instead)
- You are a candidate or a source for background screening services (the federal Fair Credit Reporting Act and similar state laws will apply to your personal information instead)

For more information about what laws apply to your personal information, [contact us](#).

Businesses and service providers

Under the CCPA, there is a distinction between “businesses” and “service providers.” Businesses determine the purposes and means for collecting and handling personal information, and service providers collect and handle personal information on behalf of businesses, only following the businesses’ instructions and the law and not making their own decisions about what to do with personal information.

When the CCPA applies, Sterling is sometimes a business and sometimes a service provider. When we collect and use personal information of **workers, clients, prospects, and website visitors**, we are always a business. When we collect and use personal information of **candidates and sources**, we are usually a service provider.

When we are a business, we are responsible for all aspects of compliance with the CCPA and you can generally exercise any of your rights directly with us.

When we are a service provider, we are responsible for securing and protecting personal information in our custody, reporting any requests or problems to the business (usually our client), and following that business’s instructions. We cannot decide whether it is appropriate to collect your personal information or how or whether you can exercise your rights.

The difference does not usually matter much to you, but sometimes it will affect our ability to make decisions about your personal information. For example, if we are a service provider, we might not be able to decide whether to give you a copy of your personal information or delete your personal information. We also might not be able to take personal information

that we collected for one client and share it with another client. If you contact us and we cannot do what you ask because we are a service provider, we will explain that to you and contact the relevant business (usually our client) to make sure your request gets to the right place and you get a response from the right organization.

Sale of personal information

Sterling does not sell personal information that is subject to the CCPA.

Categories and disclosure of personal information

The CCPA defines a specific list of categories of personal information and requires that we indicate each category of personal information we collect, why we collect it, where we get it from, and to whom we disclose it for a business purpose.

Each category is assigned a letter in the table below, corresponding with the subdivision of the CCPA that describes that category. We have added notations to the tables that set out the [types of personal information, sources, and purposes for collection](#) to indicate which category each type of personal information in that table belongs to.

For detailed information about who we disclose personal information to, see the section entitled [people and organizations that access personal information](#).

+ Categories of Personal Information			
Category		Collected	Disclosed
A	Identifiers such as 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	Yes	Yes
B	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	Yes	Yes
C	Characteristics of protected classifications under California or federal law	Yes	Yes
D	Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	Yes	Yes
E	Biometric information	Yes	Yes
F	Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement	Yes	Yes
G	Geolocation data	Yes	Yes
H	Audio, electronic, visual, thermal, olfactory, or similar information	Yes	Yes
I	Professional or employment-related information	Yes	Yes
J	Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, Sec. 1232g; 34 C.F.R. Part 99)	Yes	Yes
K	Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	No	No

Your Rights and Choices

You can make choices about your personal information and exercise certain rights under the law. We cannot always do what you ask us to do. Sometimes we have to do something different to follow a law, a contract or our own policy. Sometimes we have to ask our client what to do. Sometimes we cannot do something because information we have collected cannot be linked to you, like anonymous browsing information.

If you ask to exercise any rights or make any choices, we will either do what you ask, tell you why we cannot, or help you find the right person or organization to ask. We will not unfairly discriminate against you for making a choice or exercising your rights, but if there are consequences to making a choice, we will tell you what they are.

You can ask:

- for **information** about your personal information. You can ask if we have it, who we get it from, how we use it, where we store and access it, who we share it with, how long we keep it, and how we protect it when we share it across borders or between organizations. This is sometimes called the *right to know* or the *right to be informed*
- for **a copy** of your personal information. This is sometimes called the *right to know* or the *right of access*
- to **correct** your personal information if it is incorrect. This is sometimes called the *right to rectification* or a *dispute*
- To **add a comment** to your personal information if you want it to be clarified or if you disagree with us about whether it is correct
- to **stop using** your personal information, either temporarily or permanently, for some or all purposes. This is sometimes called the *right to restriction of processing*, the *right to object*, or the *right to opt out*. If we are using your personal information based on your consent, this might also be a *withdrawal of consent*
- to **delete** your personal information. This is sometimes called the *right to be forgotten*
- to **share** your personal information with another organization. This is sometimes called the *right to data portability*

To exercise any of these rights, use [this form](#), [call us](#), or email us at privacy@sterlingcheck.com.

Complaints

If you are not happy with how we have collected, used, disclosed, or otherwise handled your personal information, or if you tried to make a choice or exercise rights about your personal information and you are not happy with the outcome, you can make a complaint using [this form](#), by [calling us](#), or by emailing us at privacy@sterlingcheck.com. We commit to investigating and resolving all complaints we receive about privacy and data protection.

If you are still not satisfied, in some places you can complain to a regulatory or supervisory authority. See the table below for who to contact.

+ Complaints to regulatory or supervisory authorities	
Country	Authority
United Kingdom	Information Commissioner's Office
European Union	Your national data protection authority
Switzerland	The Federal Data Protection and Information Commissioner
United States	<ul style="list-style-type: none"> – Federal Trade Commission – Consumer Financial Protection Bureau – Your state's Attorney General
Canada	<ul style="list-style-type: none"> – The Office of the Privacy Commissioner of Canada – The Office of the Information and Privacy Commissioner of Alberta – The Office of the Information and Privacy Commissioner for British Columbia

	– La Commission d'accès à l'information du Québec
Australia	Office of the Australian Information Commissioner
Singapore	The Personal Data Protection Commissioner
Hong Kong	The Privacy Commissioner for Personal Data
Philippines	The National Privacy Commission
Malaysia	Department of Personal Data Protection
Other countries	Email us at privacy@sterlingcheck.com for more information

Background check disputes

If you are a candidate, you have received the results of your background check, and you believe the results are incorrect, you can use the contact the information provided with the copy of your background check to request a dispute.

United States

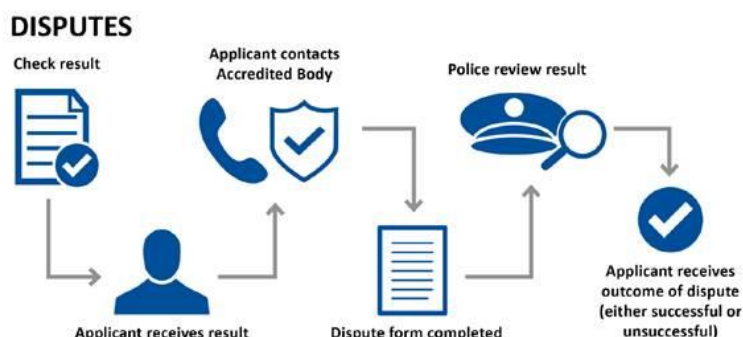
Contact our dispute resolution team at 1-844-468-6522 or dispute.resolution@sterlingcheck.com.

Canada

Contact our candidate support team at 1-866-455-5671 or econsentsupport@sterlingbackcheck.ca.

Australia (ACIC national coordinated criminal history checks)

If you believe that the information returned on your police check is incorrect, please contact us at help@sterlingrisq.com or on (02) 9392 8866 for assistance.



Please note that the dispute process can take between four to 21 business days.

All other countries

Contact our privacy team using [this form](#) or by emailing privacy@sterlingcheck.com.

Global telephone numbers

We strongly recommend you contact us online or by email. This helps ensure your request will be directed to the right place, right away. If you prefer to reach us by telephone, please use the numbers in the table below to reach one of our representatives.

+ Global Telephone Numbers	
Country	Telephone Number
United States (Sterling)	1-800-899-2272
United States (Sterling Volunteers)	1-855-326-1860
United States (Sterling Identity)	1-844-787-3431
United States (Sterling Diligence)	1-833-231-5766
Canada	1-866-455-5671
United Kingdom	01792 478838
Australia	(02) 9392 8866
China	+86 4006 516 177
Hong Kong SAR	+852 2525 2331
Singapore	+65 6352 7390
Philippines	+63 (02) 7795 9229
Malaysia	+603 5630 1125
India	+91 2225974430
All other countries in Asia-Pacific	+63 (02) 7795 9229
All other countries in the Americas	+1 604 881-2011
All other countries in Europe, the Middle East and Africa	+44 (0)1792 478838

Responsible individuals

We have appointed individuals whose sole responsibility is the protection of personal information and compliance with privacy or data protection laws. If you cannot or do not want to use the forms and resources above, you are always welcome to contact the responsible individual for your region at privacy@sterlingcheck.com. These are the job titles of the responsible individuals:

Europe, Middle East, and Africa: Data Protection Officer (EMEA)

Americas and Asia-Pacific: Global Head of Privacy

Privacy Contact Form

Please complete this form to exercise your privacy rights. If you have difficulty using this form, you can email us at privacy@sterlingcheck.com. You can also contact us by [postal mail](#) or by [telephone](#), but by using this form or our email address your request will be handled more quickly and efficiently.

Information you enter on this form will be used only for the purposes of responding to your inquiry. It will be stored in the United States and Canada for a maximum of seven years for audit purposes and to respond to any future claims or inquiries relating to your request.

Name: _____

Date of birth (optional): _____
this will help us find information about you if you are a candidate.

Your relationship to Sterling (select the most relevant option):

- ☐ **Candidate (we have performed or will perform background screening or identity services on you)** Please provide the name of the organization that requested services on you: _____
- ☐ Website visitor
- ☐ Client (you can order our services to get background or identity information about other people)
- ☐ Prospect (we are seeking to have you as a client)
- ☐ Source (we have asked you for information to help complete background or identity services on someone else)
- ☐ Worker (you have performed or will perform work for Sterling as an employee or contractor)
- ☐ Other/don't know

Email: _____
We will respond to your inquiry by email. A copy of this form will be sent to your email address as well.

Phone number (optional): _____
If you provide your number, we may contact you by telephone to clarify your request.

I am:

- ☐ Contacting Sterling about my own personal information
- ☐ Contacting Sterling on someone else's behalf

How can we help?

Note: Sterling does not sell your personal information, so there is no need to contact us to ask us not to sell your personal information.

- ☐ I need a copy of my personal information, or to know how it has been handled
- ☐ Stop using my personal information
- ☐ Correct my personal information or add a comment
- ☐ Delete my personal information
- ☐ Share my personal information with a third party
- ☐ Complain about how my personal information has been handled
- ☐ Other

SUBMIT