

ACTON International, Ltd - Privacy Policy

This privacy policy explains what information we process and how it is processed.

Background. ACTON processes and brokers information gathered from its data suppliers. ACTON's data suppliers strictly comply with all pertinent privacy regulations and handle inquiries from the data subjects. ACTON has no contact with the data subjects referenced within the brokered data, but will work with the data suppliers to respond to all inquiries. ACTON does not gather data through the use of cookies or through the use of any other collection methods. ACTON's customers include international data brokers and identity verification providers.

-1- Brokered Information. Personal identifying information is used only for the legitimate business interests (defined below) of ACTON's customers and to comply with applicable laws and regulations. Brokered information may include the data subject's name, address, cell phone, DOB, marital status, occupation, income, dwelling type and the existence of children within the home. ACTON does not broker sensitive information such as personal data revealing: racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; health or sex life.

-2- Legitimate Business Interests. ACTON's customers may use the brokered data for any of the following legitimate business interests: (1) identity verification; (2) electronic directory assistance; (3) fraud detection; (4) background screening; (5) collection of unpaid bills; (6) anti-terrorism; (7) designing analytical models to develop market segmentation codes.

-3- Control of Data. A data subject may at any time remove his/her personal identifying information from ACTON's brokered databases by sending an email to ACTON requesting its removal (bwilson@acton.com).

-4- Security. ACTON uses industry-standard encryption technology when receiving and transferring data from its data suppliers and customers.

-5- US-EU Privacy Shield. ACTON complies with the EU-U.S. Privacy Shield Framework. These programs were designed by the U.S. Department of Commerce and European Commission to provide companies on both sides of the Atlantic with a mechanism to comply with EU data protection requirements when transferring personal data from the European Union to the United States in support of trans-Atlantic commerce. The Privacy Shield Framework provides a set of robust and enforceable protections for the personal data of EU individuals. The Framework provides transparency regarding how participating companies use personal data, strong U.S. government oversight, and increased cooperation with EU data protection authorities (DPAs). The Privacy Shield Framework offers

EU individuals access to multiple avenues to address any concerns regarding participants' compliance with the Framework, including free dispute resolution. The Framework ensures a continuing level of protection consistent with Privacy Shield Principles when personal data collected under the Framework is transferred to third parties. The Framework also makes it easier for EU individuals to understand and exercise their rights. To learn more about the EU-U.S. Privacy Shield Framework, and see the list of participating organizations, please visit <https://www.privacyshield.gov>.

-6- Arbitration and Oversight. As further explained in the Privacy Shield Principles, a binding arbitration option will also be made available to data subjects in order to address residual complaints not resolved by other means. ACTON is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC).

-7- Onward Transfer Liability. ACTON is liable for any onward transfer of personal data to any third party vendors or service providers that ACTON may use in the provision of its services.

-8- Disclaimers. While ACTON has safeguards in place to prevent unauthorized access or interception, there is no absolute guarantee of security. In the event of an interception or unauthorized access, ACTON shall not be responsible for such interception or unauthorized access, or any direct, indirect, special, incidental, or consequential damages (including lost profits) suffered by a data subject, even if ACTON has previously been advised of the possibility of such damages. ACTON does not warrant, either expressly or impliedly, that the information provided by a data supplier shall be free from interception or unauthorized access, and does not provide any implied warranties of merchantability and fitness for a particular purpose.

-9- Cooperation with Law Enforcement. ACTON cooperates with inquiries from law enforcement agencies and will assist when ACTON is required by law to do so, or when ACTON in the exercise of its judgment, determines it is necessary to protect itself, its data suppliers and its customers.

-10- Independent Recourse. In compliance with the EU-US Privacy Shield, ACTON commits to resolve complaints from data subjects concerning their privacy and ACTON's collection or use of personal information. European Union individuals with inquiries or complaints regarding this privacy policy should contact ACTON: bwilson@acton.com, or in writing at the address listed below.

ACTON has further committed to refer unresolved privacy complaints under the EU-US Privacy Shield to an independent dispute resolution mechanism handled by the European Union (EU) Data Protection Authorities (DPAs). ACTON therefore agrees to resolve all disputes in connection with our policies and practices through the aforementioned EU Data Protection Authorities (DPAs).

-11- Changes to the Privacy Policy. ACTON may, at any time and without notice, add to, change, update or modify this Privacy Policy, simply by posting such change, update or modification on our website. If ACTON decides to change its Privacy Policy, the changes will be posted on the website so that you are always aware of what information is collected, how it is used, and under what circumstances it will be disclosed. Any such change, update or modification will be effective immediately upon posting on the website.

-12- Contact Information

Our postal address is:

ACTON International, Ltd
5760 Cornhusker Hwy – Suite 2
Lincoln, NE 68507
United States of America

Attn: Privacy Officer

We can be reached via e-mail:

bwilson@acton.com

Last updated on September 6, 2016