

# Global Screening Compliance: Protecting Your Candidates' Data

Leading the Global Screening  
Industry with a Unique Approach  
to Privacy Compliance



## Table of Contents

Introduction	3
Data Protection Principles When Screening Globally	3
Conclusion	5

## Introduction

As populations become increasingly mobile—with employees living and working across multiple countries during their lifetime—performing comprehensive background checks through a reputable global screening provider is essential to making the workplace as safe as possible around the world. The processing of personal data (also referred to as Personally Identifiable Information, or “PII” in certain countries such as the United States) is central to the background screening process.



But as an employer, how can you be sure the provider you engage to complete the background checks for your global employees is keeping their personal data safe and secure at all times? And as a candidate, how can you be sure your personal data is secure throughout the background screening process?

We strive to be a leader in the responsible use of information by employing an industry leading, comprehensive ninestep risk management program to ensure the privacy and security of candidate personal data throughout the screening process. Our program focuses on:

- Following extremely high voluntary standards of compliance;
- Limiting access to personal data to those who are properly credentialed and have a clear need for access;
- Maintaining a secure platform; and
- Observing strict collection and retention limitations

## Data Protection Principles When Screening Globally

### Following extremely high, voluntary standards of compliance

**Step 1 - Follow the most stringent privacy requirements worldwide** from European Union (EU) and United States (U.S.) law. We take the most protective of the world’s many privacy requirements and make them mandatory for all global screening requests, even in countries where no privacy or consumer protection regimes exist. For example, all candidates—regardless of where they live or where the search was completed—may dispute the result collected through the Consumer Advocacy Center, even if it’s not required by law in the country where the candidate lives or the location in which the search is completed. Likewise, global screening results are never repurposed—they are only used to perform the exact search to which the candidate consented.

In addition, our U.S. Employment Screening businesses have self-certified

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pursuant to the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework. Under these privacy frameworks, First Advantage complies with strict requirements regarding the transfer of personal data from the EU and Switzerland to the United States. Pursuant to Privacy Shield frameworks, any onward transfer of personal data is only permitted to authorized suppliers with whom First Advantage has an onward transfer agreement to perform some part of the data processing. All suppliers are required to sign a Professional Services Agreement and meet all onboarding requirements. These standards are applied for all data transfers, including those outside of the EU and Switzerland. Confirmation can be obtained by reviewing the following [www.privacyshield.gov/list](http://www.privacyshield.gov/list).

**Step 2 - Conduct regular security and compliance audits.** Audits are an excellent method for ensuring that processes are followed and compliance is monitored. We regularly audit our global operations to ensure personal data is secure. Audits are conducted on the following groups:

- Customers: These audits ensure our customers meet their contractual obligations under the U.S. Fair Credit Reporting Act (FCRA) and other privacy and consumer protection regulations, where applicable.
- Suppliers: These audits verify that suppliers are adhering to data security requirements.

In addition, privacy audits are conducted annually by our Privacy, Security and Compliance Organization (PSCO) prior to the annual recertification to ensure compliance with Privacy Shield Standard Operating Procedures.

### **Limiting access to personal data to those who are properly credentialed and have a clear need for access**

**Step 3 - Verify credentials of all suppliers accessing our screening products.** All third-party suppliers must meet a set of contractual, security and operational requirements. Security requirements are audited at least annually. To the best of our knowledge, we are the only truly global background screening company in the world that requires compliance with such strict standards from its suppliers.

**Step 4 - Complete new customer security reviews.** Information security is not just the responsibility of First Advantage but also the responsibility of our customers. Prior to allowing access to any global screening data or allowing a customer to access Direct Advantage, our premier user interface, from outside the U.S., every customer must successfully meet credentialing requirements and must complete an onboarding process. This includes a data flow analysis to identify any delivery restrictions to certain countries.

### **Maintaining a secure platform**

**Step 5 - Provide access to information on a secured platform.** Our global operations and our suppliers use a proprietary Web-based platform to fulfill all searches. This platform, Global Case Management (GCM), provides a common, secure platform for processing orders. The use of GCM eliminates the need to send personal data by facsimile or email, since all information is entered and retained within GCM. GCM was designed with privacy built into the everyday system functions, making privacy a default rather than a choice. Activity in GCM can be further monitored by global screening operations staff through the use of exception and management reports.

**Step 6 - Control access to secured platform.** Access to GCM is only available to a user who is coming from an Internet Protocol (IP) address that has been verified during the onboarding process and has been entered into that supplier's set up. The use of IP address restrictions to control access further helps prevent inappropriate access to GCM from unauthorized IP addresses. IP address restrictions also permit First Advantage to allow GCM user access only from approved and credentialed locations or through a secure, remote connection such as Virtual

Private Network (VPN).

### Observing strict collection and retention limitations

**Step 7 - Mask personal data and track access to it in a secure platform.** We have designed privacy into our systems and operations to reduce the risk of accidental disclosure of personal data where it is not required to process global background searches. For example, we mask personal data and track access to it.

**Step 8 - Impose collection limitations.** We only request the information that is required to complete each search so that the search is completed using the minimum personal data necessary.

**Step 9 - Remove data no longer needed to reduce risk.** We remove data and attachments when they are no longer needed according to the rules of the specific source, country or region. This makes adherence to the many different privacy rules and source data retention requirements easier. Our customers also have the option to set customized retention periods within their account set up options. Finally, candidate information can be deleted upon request in order to help support compliance with certain privacy laws and regulations.

Be sure the provider you engage to complete the background checks for your global employees is keeping their personal data safe and secure at all times.

## CONCLUSION

Maintaining the security of personal data flows is a crucial part of any employer's global screening program and should be a key concern of any candidate who must pass a background screen prior to receiving an offer of employment. Selecting a global screening partner with a comprehensive risk management program that is subject to continuous cross-checks and audits will help provide peace of mind that the data collected is secure, used only for the purpose of fulfilling the background screening search and retained only for as long as necessary.



We can help. For more information, contact First Advantage today:

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