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DATA DRIVEN SAFETY, LLC

DATA ACQUISITION, STORAGE AND DISSEMINATION POLICY

1. Purpose.

This policy explains Data Driven Safety's (hereinafter "we/us/our") policies, practices and expectations for gathering, storing, managing and distributing data. It is intended to help us achieve a rational and consistent approach to procuring/managing data while giving our data providers visibility into the standards we expect them to adhere to.

2. Data Acquisition.

We limit our acquisition of public and non-public information (hereinafter, the "DDS Data") to established, reputable sources in the government and private sectors (hereinafter, the "Data Sources"). Our strong preference is to obtain information directly from the governmental source that created the relevant records.

All information within the DDS Data is and shall continue to be obtained by the Company in a lawful manner, consistent with any contractual obligations imposed by the Data Sources.

We will not consume medical records, social security numbers, restricted juvenile information, sealed case data or other highly-sensitive information from public information sources.

All information provided to us by our customers for matching and other similar services (hereinafter, the "Customer Data") will be used in strict conformity to all legal and contractual obligations and, in no event, shall such data be commingled with the DDS Data.

We shall always strive to reduce the administrative burden of our requests for DDS Data on governmental personnel. This includes an obligation to make timely payments to Data Sources.

3. Accuracy of Collected Information.

At all times we shall use reasonable efforts to accurately consume, store, manipulate and reproduce the DDS Data. No representation as to the accuracy, correctness, timeliness or completeness of the DDS Data will be made to customers and a disclaimer of such warranties will accompany all provision of data to third parties at least to the extent contractually required by the

Data Sources.

4. Data Storage.

We shall at all times securely protect the integrity and confidentiality of the DDS Data and the Customer Data, specifically including any component of the information that identifies the individual associated with the record (e.g., date of birth, driver license number, etc.). DDS Data shall be purged in a timely manner and in accordance with all legal requirements.

Customer Data will be purged from all DDS systems within ten (10) business days of the earlier of (I) the cessation of services for such customer or such customer's written request to DDS. In addition, DDS shall honor a request to return such Customer Data to the originating customer if the request is made in writing. Notwithstanding the foregoing, DDS reserves the right to retain an archival copy of all Customer Data for legal compliance and audit purposes for ten (10) years. Such archived data shall not be accessed for any reason other than as necessary for DDS to comply with applicable legal requirements.

5. Data Dissemination.

We will only transact business with reputable customers that have provided satisfactory assurances of their legitimate, legal purpose for using DDS Data. Our provision of information to these customers shall be conditioned on execution, in advance, of a DDS-approved contract covering receipt and use of the DDS Data.

In no event shall we provide a subset of DDS Data to a customer (or any other third party) if the dissemination of that information will run counter to our contractual and other lawful obligations. In support of the foregoing, DDS shall maintain records (on a per-Data Source basis) as to use and dissemination limitations associated with the DDS Data.

September 1, 2015 – Approved by Jason E. Murphy
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