

PRIVACY POLICY

Last Updated: April 25, 2023

This Privacy Policy and Notice (we refer to it as our “Privacy Policy”) describes how Diverse Facility Solutions Inc. (“DFS” or “we” or “us”) collects, uses, shares, retains, and protects information about you when you (1) visit us at www.diversefacilitysolutions.com or one of the pages thereon (the “Website”); (2) communicate with us via email and other electronic messages; (3) create an account on our Website; and (4) otherwise interact with us online or offline, such as on the telephone and in written correspondence. We adopt this Privacy Policy to fulfill our service commitment to you and to comply with legal obligations as we process personal information, described below.

This Privacy Policy does not apply to information collected or used by any third party, affiliate, or affiliate of a third party, including those that may link to or can be accessible via the Website. Please review their policies. DFS is not responsible for the content or the privacy policies or practices of any third-parties, third-party websites, or third-party applications.

Before accessing, using, or interacting with the Website you should carefully review this Privacy Policy. We may change our Privacy Policy from time to time and encourage you to review it whenever you interact with us.

User Consent: By choosing to interact with DFS, including through our Website and by communicating with us via email or telephone, you consent to the collection and use of information as described in this Privacy Policy and you represent that you are at least 18 years old. If you are under the age of 18 or you do not consent to the collection, use and/or disclosure of your personal information as set forth in this Privacy Policy, please exit and do not use our Website or other applications or services.

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What Personal Information Does DFS Collect?

For purposes of this Privacy Policy, unless noted otherwise, when we use the term “personal information,” we mean information that identifies, relates to, describes, references, is reasonably capable of being associated with or could reasonably be linked, directly or indirectly, with a particular person or household (“personal information”).

We may collect the following, personal information: real name (including first and last name), alias, postal address, email address and phone number. We may also collect first-party cookie tracking information.

How Does DFS Collect Information About Me?

We collect and store information that you give us directly. For example, when you:

- **Fill out the Form “Contact Us:”** we may collect your name, email address, telephone number and other information you voluntarily provide when you fill out our online form “Contact Us.”
- **Apply for employment with DFS:** we may collect your name, address, phone number, education, federal work status, race, gender, and veteran status. We use a Third-Party service provider, Paycom, to collect and store this information.
- **Email us or sign up for notifications:** we may collect your name, email address, phone number, and address.

We also partner with certain Third-Party Service providers as follows:

- We offer Client Resources through a third-party portal maintained by **Trax Insights or Trax Analytics**. Trax provides a janitorial suite of solutions by utilizing certain data points and technology to create janitorial procedures. Trax may use cookies and other technologies to collect data on your behavior and devices. Trax is contractually forbidden to sell the data collected on our behalf. For more information on what is collected and stored by Trax, please review its privacy policy.
- We invite you to apply for a position as one of our team members. As a service company, we understand that our staff is the key to our success. We value our team members and offer competitive salaries and benefit packages. We partner with **Paycom**, which maintains our up-to-date job postings and other employee-related content. Paycom collects and stores data you provide to the third-party provider on forms and the company’s website. Paycom is contractually forbidden to sell any of the data collected on our behalf. For more information on what is collected and stored by Paycom, please review its privacy policy and terms of use.

We also receive and store certain types of information automatically when you interact with us online or with the Website.

- Some of our online services, including our Website and third party services, may use Cookies. Cookies are small bits of information that are stored on your hard drive or in connection with your Internet browser that may identify you as a certain user but do not identify you by name or postal address, unless you have provided us with such information or set up preferences in your browser to do so automatically. Specifically, DFS uses first-party cookies to provide you with a more customized service and to track and measure website usage.
- DFS uses Google Analytics to collect anonymized data points about how visitors use our Website, including the number of visitors to the Website, from where visitors navigated to get to our Website, and the webpages. This information is collected and maintained in an anonymous form and used to compile reports and help us improve our Website. If you choose to opt-out of Google Analytics, you can install a [browser add-on](#) in your browser across all websites (please note that DFS is not responsible for the content of external websites).
- Our third-party service provider(s) may use log data for troubleshooting, statistics, analytics, quality assurance, and to monitor system security.

DFS may also learn information indirectly about you, which you make publicly available, such as on a social network or shared with third parties. Please note, any content or information you share with or provide to third parties regarding DFS, your communications with DFS, or using or related to the Website may not be private or confidential and is not the responsibility of DFS.

How Does DFS Use Information About Me?

DFS may use and process information about you, including personal information, for one or more of the legitimate business purposes described in this Privacy Policy. For example, DFS (and/or our Service Providers) may use information about you to:

- Respond to your inquiries and questions and to provide you customer support services
- Deliver communications, information or services, and promotions
- Present, optimize, and maintain the security of our Website and their contents
- Detect and prevent fraud or other crimes
- Respond to law enforcement requests and as required by applicable law or court order
- Fulfill or meet the reason your information was collected or provided
- Allow you to participate in interactive features on our Website
- Personalize your Website experience and to deliver content, product and service offerings relevant to your interests, including targeted offers through our Website, and third-party sites

Does DFS Share the Information It Receives About Me?

We do not believe that we “sell” your personal information as such is defined by applicable privacy laws, and, accordingly, we do not offer a “do not sell” opt-out. We will not sell personal information that we collected without giving you an opportunity to opt-out and unless we first give you notice of our intent to sell and an express opportunity to opt-out of that sale. We do not knowingly sell the personal information of Consumers under the age of 16.

We may share your personal information with third-party service providers with whom we have entered into contracts that require personal information be kept confidential and prohibit the retention, use, or disclosure of personal information for any purpose other than the services specified. We may also share your information for the following purposes, which are not a sale: (i) if you direct us to share personal information; (ii) if you are a California resident, to comply with your requests under the CCPA; (iii) disclosures amongst the entities that constitute DFS, or as part of a merger or asset sale; and (iv) as otherwise required or permitted by applicable law.

How Does DFS Secure Information About Me?

We realize that you trust us to protect your personal information. We take that trust seriously and maintain physical, electronic and procedural safeguards that are consistent with industry standards to help protect the privacy, accuracy, and reliability of personal information and to protect it from loss, misuse, unauthorized access, disclosure, acquisition, exfiltration, alteration and destruction.

We also take commercially reasonable steps to ensure that our third-party service providers reasonably protect and secure your information. If DFS becomes aware that a third-party service provider is using or disclosing information improperly, we will take necessary and immediate steps to end or correct such improper use or disclosure.

What Choices Do I Have?

DFS seeks to ensure all individuals are provided with the rights mandated by their governing jurisdiction. Not all of the rights discussed herein will apply to everyone and, depending upon your jurisdiction, may not apply to you. For example, California Residents have the right, under certain circumstances, to request that DFS disclose, delete or correct their personal information. California Residents can read more [here](#).

If you are a resident of Virginia, Colorado, Connecticut, or Utah, you may have the right to request that we:

- Provide you access to recorded personal information that you have previously provided to us
- Correct or amend inaccurate information we have about you
- Delete the collected information assuming that request does not conflict with our legal obligations or other legitimate business purposes for maintaining information
- Honor your request to opt-out of processing of personal data for purposes of targeted advertising, sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects concerning the consumer.

Virginia, Colorado and Connecticut residents may also have the right to appeal our decision about the request.

To exercise these rights, as described above, please submit a request to us by either:

- Calling us at 866-364-8139
- Visiting us at www.diversefacilitysolutions.com to link to privacy@dfscompany.com
- Emailing us directly at privacy@dfscompany.com

Communications from DFS

Users may opt-out of receiving certain communications from DFS by following the unsubscribe process described in our communications or by contacting us by using the contact information provided below. Please note that such requests may take some time to fulfill and that certain communications may be non-optional.

Notice to California Residents of Their Rights

The California Consumer Privacy Act (the “CCPA”) and as amended by the California Privacy Rights Act (the “CPRP”), also known as Proposition 24, provides California Residents (as defined in the Act), specific rights regarding their personal information. For purposes of the CCPA, personal information does not include: publicly available information from government records; de-identified or aggregated consumer information; and, information excluded from the CCPA’s scope, including: health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data, certain information covered by sector-specific privacy laws, such as the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA), the California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994 (DPPA). Any terms defined in the CCPA have the same meaning when used in this Notice.

The rights conferred by the CCPA and CPRA apply solely to visitors, users, and others who reside in the State of California. The following sections describe your rights and explains how to exercise those rights.

Right to Request Access to Specific Information and Data Portability Rights

The CCPA grants California Residents the right to ask DFS about its collection and use of the personal information it has collected, used, and disclosed over the past twelve (12) months. Instructions on how a California Resident can submit a verifiable consumer request for access to this information (referred to as a “Request to Know”) are below. Once we receive and confirm that you have made a verifiable consumer Request to Know, we will make an individualized disclosure to you about:

- Categories of personal information we collected about you;
- Categories of sources for the personal information we collected about you;
- Our business or commercial purpose for collecting the personal information;
- Categories of third parties with whom we share that personal information;
- Certain, specific pieces personal information we collected about you (“Data Portability Request”); or,
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing: (1) sales, identifying the personal information categories that each category of recipient purchased; and, (2) disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Right to Request Deletion of Your Data

California Residents have the right to request that we delete the personal information that we have collected and retained (“Requests to Delete”). Upon our receipt of a verifiable request to delete personal information (*see* below), we shall delete the personal information from our records and will direct our service providers to delete your personal information from their records.

However, **please note** that DFS may deny your request to delete and need not comply with such a request (and need not ask third-party service providers to comply) if retaining the information is necessary to perform certain functions or commitments, including: completing the transaction for which the personal information was collected; providing a service requested; otherwise performing our contract with you or taking reasonably anticipated actions within the context of our ongoing business relationship with you; detecting security incidents and protecting against malicious, deceptive or otherwise illegal activity or to prosecute those responsible for those activities; complying with a legal obligation or otherwise using the personal information, internally, in a lawful manner; complying with the California Electronic Communications Privacy Act; fulfilling the terms of a written warranty or product recall conducted in accordance with federal law; or, for a purpose otherwise contemplated by Cal. Civ. Code Section 1798.105(c)-(d) or as otherwise amended.

Right to Correct Inaccurate Personal Information

The CPRA provides an additional right for California Residents to request that we correct inaccurate personal information that we maintain about them (the “**Right to Correct**”). DFS will use commercially reasonable efforts in order to comply with California consumer requests to correct.

How to Exercise Your Access, Data Portability, Deletion and Correction Rights

You may make a verifiable request to exercise your right to access or data portability twice within a 12-month period. To exercise the access, data portability, deletion, and correction rights described above, please submit a verifiable consumer request to us by either:

- Calling us at 866-364-8139
- Emailing us at privacy@dfscompany.com

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf may make a verifiable consumer request related to the personal information about you. If the request is made through an agent, we reserve the right to require a signed authorization or verification of the agent's identity from you in order to protect the privacy of the personal information requested. You may also make a verifiable consumer request on behalf of your minor child.

We cannot provide you with the information sought in a Request to Know, or comply with a Request to Delete or Correct, if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. A verifiable request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative;
- Describe your request with sufficient detail that allows us to properly understand, evaluate and respond to it.

We reserve the right to require additional information from you to verify your request before we respond. Any information provided to us in a verifiable customer request will be used only to verify the requestor's identity or authority to make the request.

Response Timing and Format

We will acknowledge your request or exercise of the foregoing Rights within ten (10) days of receipt with information regarding how we will process your request. We will endeavor to respond to a verifiable consumer request within forty-five (45) days of receipt. If we require more time to provide a response, we will inform you of the reason and extension period in writing. We typically deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the twelve (12) month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

As mentioned above, we may collect or process sensitive data as needed or required to deliver services you have requested. You may request that we delete this information, subject to certain exceptions as provided by the CCPA.

Other California Privacy Rights

Under California Civil Code Section 1798.83 (known as the "Shine the Light" law), residents of California may request certain information about our disclosure of personal information during the prior calendar year to third parties for their direct marketing purposes. To make such a request, please write to us at the address below or at privacy@dfscompany.com with "Request for California Privacy Information" on the subject line and in the body of your message. We will comply with your request within thirty (30) days or as otherwise required by the statute. Please be aware that not all information sharing is covered by the "Shine the Light" requirements and only information on covered sharing will be included in our response.

Non-Discrimination

We will not discriminate against you for exercising any of the rights conferred by California statute, including the CCPA. Unless permitted by law, we will not: deny you goods or services; charge you different prices or rates; provide you a different level or quality of goods or services; or suggest that you may receive a different price or rate or a different level or quality of goods or services.

Changes to Our Privacy Policy

DFS may modify this Privacy Policy from time to time. The most current version will govern our use of your information and will be located at [www.diversefacilitysolutions.com/privacy-policy.com](http://www.diversefacilitysolutions.com/privacy-policy). You may contact us to obtain prior versions. We will notify you of material changes to this policy by posting a notice at the Website or by emailing you at an email address associated with your Website Account, if applicable, and provide an "at a glance" overview of any changes.

Contact for More Information

Diverse Facility Solutions is located at 12838 S. Cicero Ave., Alsip, Illinois 60803. Should you have any comments or questions about how we collect and use your personal information, communication can be directed to our postal address, via email to privacy@dfscompany.com or by telephone to 773-582-1022.