



# 4Thought Marketing Background Checks

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## Executive Summary

4Thought Marketing operates as a fully remote organization and maintains strict security policies to comply with legal requirements and customer expectations. This document outlines our comprehensive background check process for all personnel who will have access to our systems, customer data, or internal operations.

### Key Points:

- ALL employees and contractors undergo the same level of background screening
- Background checks are mandatory before commencing work
- The company handles customer PII only with explicit pre-approval, stored securely in Egnyte
- No PII is permitted on personal devices or laptops
- Screening requirements are documented at [4ThoughtMarketing.com/trust](https://4thoughtmarketing.com/trust)

# Purpose and Scope

## Purpose

This policy ensures that 4Thought Marketing maintains a secure workforce by conducting appropriate background verifications on all personnel, thereby protecting our customers, systems, and reputation.

## Scope

This policy applies to:

- **All full-time employees** regardless of location or role
- **All contractors and consultants** with access to internal systems
- **All temporary workers** with system access
- **Limited exceptions:** Marketing personnel without internal system access may be exempt with documented approval

## Data Handling Context

4Thought Marketing's security posture is informed by our controlled data exposure:

- We do NOT store or process health information
- We do NOT store or process financial information
- We MAY store customer PII data only with explicit pre-approval from customers
- All approved PII is stored exclusively in our secure Egnyte server
- PII is NEVER retained on personal laptops or portable devices
- Our primary PII exposure is limited to email addresses for standard operations

## Policy Statement

4Thought Marketing requires comprehensive background checks for all personnel before their start date. This policy is non-negotiable for positions with system access and applies globally to our fully remote workforce.

### Core Principles:

1. Background verification is completed BEFORE work commencement
2. All personnel receive the same level of screening regardless of role
3. Any felony or equivalent criminal history is disqualifying
4. No re-verification is currently required post-hire
5. Regional variations in process are accommodated where legally required

## **Background Check Requirements**

### **Universal Screening Components**

All 4Thought Marketing personnel undergo verification of:

1. **Identity Verification**
  - Government-issued ID validation
  - Address verification

## **2. Criminal Background Check**

- County/local criminal records
- State/provincial criminal records
- Federal/national criminal records
- International criminal databases (where available)

## **3. Security Checks**

- Sex offender registry search
- Terrorist watchlist screening
- OFAC (Office of Foreign Assets Control) check
- Global sanctions lists

## **4. Professional Verification** (as applicable)

- Education verification

- Employment verification
- Professional license verification

## Regional Processes

As a fully remote organization, 4Thought Marketing adapts its background check process to comply with local laws and available services in each team member's location.

### United States Personnel

**Vendor:** [HireRight](#)

#### Services Provided:

- HireRight County Criminal, Felony and Misdemeanor Records Search™
- HireRight State Sex Offender Registry Search™ (all US states)
- HireRight Widescreen Plus, including:

- County courts
- State Administrative Offices of Courts
- Departments of Correction
- Departments of Public Safety
- Federal Office of Foreign Asset Control (OFAC)
- 30+ years of compiled background check records

## **India-Based Personnel**

**Vendor:** [Securitas India](#)

### **Services Provided:**

- Criminal record check (database and court verification)

- Personal ID verification
- Public Safety Verification
- Interpol and UN sanctions check
- Address verification
- Education/employment verification as needed

## **Costa Rica-Based Personnel**

**Process:** Direct documentation from government sources

### **Requirements:**

- Criminal background certificate from the Costa Rican [Ministry of Justice](#)
- Must be provided before work commencement
- Document must be current (within the last 90 days)

- Original or certified copy required

## **Other International Locations**

For personnel in countries outside the US, India, or Costa Rica:

- Background checks are conducted using locally appropriate vendors
- Minimum requirements match the universal screening components
- Legal compliance with local privacy and employment laws is mandatory
- The Security Officer approves all international vendor selections

## **Disqualification Criteria**

### **Automatic Disqualification**

The following findings result in automatic disqualification:

- Any felony conviction or equivalent
- Presence on terrorist watchlists or sanctions lists
- Sex offender registry listing
- Identity fraud or falsification of application materials

## **Review Required**

The following require review by the Security Officer and HR:

- Misdemeanor convictions
- Pending criminal charges
- Significant discrepancies in employment or education history

## **Historical Note**

To date, 4Thought Marketing has maintained a zero-tolerance approach and has not hired any

individual with any criminal history.

## Re-verification and Ongoing Monitoring

### Current Policy

- Background checks are conducted **once** at the pre-employment stage
- No periodic re-verification is currently required
- This applies to all personnel regardless of tenure

### New Policy Considerations 2025

#### 1. Annual Attestations (Recommended)

- Require employees to annually attest they have not been convicted of any crimes
- Include attestation in annual security awareness training
- Document acceptance of data handling policies

## 2. Documentation

- Maintain clear records of initial screening
- Document access levels to Egnyte and customer data

# Data Privacy and Retention

## Privacy Principles

- Background check information is treated as confidential
- Access is limited to HR and Security Officer only
- Information is stored separately from general personnel files
- Compliance with GDPR, CCPA, and other applicable privacy laws

## Retention Schedule

- **Successful hires:** 7 years from separation date
- **Unsuccessful candidates:** 2 years from decision date
- **Disputed results:** Until resolution plus standard retention period

## Data Security

- Electronic records are encrypted at rest and in transit
- Physical records (if any) are stored in locked, access-controlled locations
- Audit trails maintained for all access to background check records

## Compliance

This policy supports compliance with:

- **SOC2 Type II** requirements for personnel security

- **GDPR** for EU data subjects
- **CCPA** for California residents
- **FCRA** (Fair Credit Reporting Act) for US personnel
- Local employment and privacy laws in all operating jurisdictions

## **Adverse Action Process (US - FCRA Compliance)**

If a background check reveals disqualifying information:

1. Pre-adverse action notice sent with copy of report
2. Candidate given opportunity to dispute (minimum 5 business days)
3. Final adverse action notice if decision unchanged
4. Documentation of all steps retained

# Vendor Information

## Primary Vendors

### HireRight (United States)

- Industry-leading background check provider
- SOC2 certified
- FCRA compliant
- Global reach with 200+ countries covered

### Securitas India

- Leading security services provider in India
- 25,000+ trained personnel
- Comprehensive database access

- Government-approved verification services

## **Vendor Management**

- Annual review of vendor certifications
- Contractual requirements for data protection
- Right to audit clauses
- Incident notification requirements

## **Contact Information**

### **For Policy Questions:**

- Security Officer: security at 4thoughtmarketing.com

### **For Background Check Status:**

- US Candidates: HireRight Candidate Portal
- India Candidates: Securitas India Representative
- Other Locations: Regional HR Contact

#### **Additional Resources:**

Full security documentation: [4ThoughtMarketing.com/trust](https://4thoughtmarketing.com/trust)