

Hireology Privacy Policy

Last Updated: January 1, 2020

Hireology, Inc. (“Hireology”, “we” or “us”) provides the website located at www.hireology.com and its associated webpages, the mobile and touch versions, and any other mobile applications or sites we have now or in the future that reference these Terms of Use (the “Site”) and the resources, services, information, communications, and publications available through the Site (the “Services”). This Privacy Policy applies to your use of the Site, as well as the associated career websites that we host and make available to you on behalf of our Customers.

To provide some background to individuals who purchase our Services (“Customers”) and their data sources (“Data Sources”), we are a data processor that processes personally identifiable information (“Personal Information”) on behalf of and in accordance with the instructions of the data controllers (i.e., our Customers), who may collect such information from Data Sources (typically, candidates) during the recruitment process or otherwise. Our Customers collect such information from Data Sources using the Site. We act only on and in accordance with instructions from the data controllers. The Personal Information from the Data Source(s) is concurrently and automatically stored and backed up from the Site to servers that are under the control and in the possession of our hosting provider. Our data processing activities are limited to the minimum necessary for the performance of the contracts between our Customers and us. For more information regarding how a Data Source’s information is processed, please refer to the applicable Customer’s privacy policy.

Consent for Collection, Use, Disclosure, Processing, and Retention

This Privacy Policy applies to Hireology’s operation and administration of the Site, and to the information that users may provide or that Hireology may have access to through the Site, but not necessarily to the Services. By submitting, entering, or providing your information through the Site, you hereby consent to Hireology’s collection, use, disclosure, processing, and retention of such information, including any Personal Information, in accordance with the terms of this Privacy Policy and only in compliance with the instructions of our Customers, the data controllers. Such collection, use, disclosure, processing, and retention may be necessary to fulfill the purpose of the contract(s) between us, our Customers, and/or our hosting provider. If a Data Source does not wish for Personal Information to be shared with us or our hosting provider

through the Site for the purposes described herein, he or she must not provide or upload such information to the Site.

We urge you to read this Privacy Policy carefully and to check back periodically as this Privacy Policy may change from time to time and Hireology may revise this Privacy Policy at any time without notice to you. The revised Privacy Policy will be effective when posted. Continued use of the Site indicates consent to the then-current Privacy Policy as posted, and you agree that the terms of the then-current Privacy Policy will apply to information previously collected or collected in the future. If you do not consent to the changes to the Privacy Policy, you must not continue to access or use the Site.

All access to and use of the Site and related services and materials is subject to the terms and conditions in Hireology's Terms of Use. Access to and use of the Services may also be subject to terms and conditions set forth in a separate agreement ("Services Agreement") between Hireology and the company or other entity purchasing such Services.

The provisions of the Terms of Use and any applicable Services Agreement take precedence over any inconsistent or contrary provisions in this Privacy Policy.

You may withdraw your consent for collection, use, disclosure, storage, or processing at any time by sending an email to support@hireology.com. Please note that if you do, we may suspend our provision of Services to you.

Personal Information that We Collect

Hireology collects information, including Personal Information, from individuals who visit the Site ("Visitors") and Customers.

When expressing an interest in obtaining additional information about the Services, registering to use the Services, or contacting us for help, Hireology requires you to provide it with contact information, such as name, company name, address, phone number, and e-mail address ("Required Contact Information"). When purchasing the Services, Hireology requires you to provide it with financial qualification and billing information, such as billing name and address, credit card number, and the number of

employees within the organization that will be using the Services (“Billing Information”). Hireology may also ask you to provide additional information, such as company annual revenues, number of employees, or industry, or you may offer to provide us with Personal Information during your interaction with the Site (each, “Optional Information”). Required Contact Information, Billing Information, and Optional Information are referred to collectively as “User Data.”

We also collect information from social media platforms and networks that you use in connection with the Site, or that share or allow you to share information with us, such as Facebook, Twitter, and LinkedIn. For example, if you use functionalities, plugins, widgets, or tools from social media platforms or networks in connection with the Site (for example, to share purchases and other content from the Site with your friends and followers on social media), we will collect the information that you share with us, or that those social media platforms or networks share with us. For more information about social media platform and network privacy practices, please review the privacy policies and settings of the social media platforms and networks that you use.

Additionally, User Data you provide to us will be used for your purchases and retained in hard copy form of the original invoice as well as within our database system, which generates our invoices.

Personal Information that Our Customers Collect

Our Customers collect the Personal Information of Data Sources in a few different ways. One way in which they collect Personal Information is directly from the Data Source(s). For example, a Data Source may provide Personal Information such as name, email address, telephone number, social security number, and information provided in a Form W-9 if he or she registers for a candidate account within the Site, applies for an open position with our Customers through the Site, or signs up for an interview through our Site. Certain Personal Information may also be provided by a Data Source on the Site, including, but not limited to, through posting material on the Site, inputting search queries, or completing surveys, forms, or polls. As a data processor, we may gain authorized access to the Personal Information of the Data Sources, including personally identifiable information, that was collected by our Customers and which is hosted in our servers.

Site Navigational Information

As you navigate the Site, Hireology and third parties we work with may also collect information through the use of commonly used information-gathering tools, such as cookies and web beacons. Such information includes standard information from your web browser (such as browser type and browser language), IP address, and the actions you take on the Site (such as the web pages viewed and the links clicked) (collectively, "Site Navigational Information"). This section describes the types of Site Navigational Information Hireology may collect and how Hireology may use this information.

Cookies

Hireology uses cookies to make interactions with Hireology's Site easy and meaningful. When you visit the Site, Hireology's servers send a cookie to your computer or mobile device. Standing alone, cookies do not personally identify you. They merely recognize your web browser. Unless you choose to identify yourself to Hireology (for example, by responding to a promotional offer, opening an account, filling out a web form, or otherwise contacting us), you remain anonymous to Hireology.

There are two types of cookies: session-based and persistent-based. Session cookies exist only during one session. They disappear from your computer or mobile device when you close your browser software or turn off your computer or mobile device. Persistent cookies remain on your computer or mobile device after you close your browser or turn off your computer or mobile device.

If you have chosen to identify yourself to Hireology, Hireology uses session cookies containing encrypted information to allow Hireology to uniquely identify you. Each time you log into the Services, a session cookie containing an encrypted, unique identifier that is tied to your account is placed in your browser. These session cookies allow Hireology to uniquely identify you when you are logged into the Services and to process your online transactions and requests. Session cookies are necessary for the Site to function and are required to use the Services. These cookies do not store any of your Personal Information. If you set your browser to block these cookies, some parts of the Site will not function and you will not be able to use the Services.

Hireology uses persistent cookies that only Hireology can read and use to identify browsers that have previously visited the Site and to provide enhanced functionality and personalization. These cookies may be set by us or by third party providers whose services we have added to our pages. When you purchase the Services or provide Hireology with Personal Information, a unique identifier is assigned to you. This unique

identifier is associated with a persistent cookie that Hireology places on your web browser. Hireology is careful about the security and confidentiality of the information stored in persistent cookies. For example, Hireology does not store account numbers or passwords in persistent cookies. If you disable your web browser's ability to accept these cookies, you will be able to navigate the Site, but you will not be able to successfully use the Services.

Hireology may use information from session and persistent cookies in combination with User Data to provide you with information about Hireology and the Services.

Web Beacons

Hireology uses web beacons alone or in conjunction with cookies to compile information about your usage of the Site and interaction with e-mails from Hireology. Web beacons are clear electronic images that can recognize certain types of information on your computer or mobile device, such as cookies, when you viewed a particular website tied to the web beacon, and a description of a website tied to the web beacon. For example, Hireology may place web beacons in marketing e-mails that notify Hireology when you click on a link in the e-mail that directs you to the Site. Hireology uses web beacons to operate and improve Hireology's Site and e-mail communications. Hireology may use information from web beacons in combination with User Data to provide you with information about Hireology and the Services.

Log Data and Performance Cookies

When you interact with our Site, our servers automatically receive and store certain personally non-identifiable information ("Log Data"). This Log Data is collected passively and may include information such as your IP address, device and browser type, or the domain from which you are visiting, Site pages you visit, the search terms you use, and any advertisements on which you click. For most users accessing the Internet from an Internet service provider, the IP address will be different every time you log on. We use Log Data and pool it with other information to monitor the use of our Site, and for the technical administration of our Site. We do not associate your IP address with any other Personal Information to identify you personally, except in cases where we are asked to comply with a subpoena or other legal demand or where we suspect that there has been a violation of our policies, our Terms of Use, any applicable Services Agreement, or applicable law.

In addition, our Site uses performance cookies to allow us to count visits and traffic sources so that we can measure and improve the performance of our Site. They help us to know which pages are the most and least popular and to see how Visitors move around the Site. All information collected by these cookies is aggregated and is therefore anonymous. If you do not allow these cookies, we will not know when you have visited our Site, and we may not be able to monitor its performance.

Third-Party Cookies and Analytics

From time to time, Hireology engages third parties to track and analyze non-personally identifiable usage and volume statistical information from individuals who visit Hireology's Site. Hireology may also use other third-party cookies to track the performance of its advertisements. The information provided to third parties does not include personal information, but this information may be re-associated with personal information after Hireology receives it. Further, certain targeting cookies may be set through our Site by our advertising partners, who may use these cookies to build a profile of your interests and show you relevant advertisements on other websites. They do not directly store your Personal Information, but are based on uniquely identifying your browser and internet device. If you choose not to allow these cookies, you will experience less targeted advertising.

We use Google Analytics to measure and report how users interact with Hireology's Site and associated websites hosted by us on behalf of our Customers, emails and advertisements to analyze the traffic to our websites and for the other purposes set forth in the "Use of Information" section below. For more information about Google Analytics and how it collects and processes data, please see ["How Google uses data when you use our partners' sites or apps."](#) For more information about how Google Analytics uses cookies to measure user interactions on websites, click [here](#). Google's ability to use and share information collected by Google Analytics about your visits to the Site is restricted by Google's [Terms of Service](#) and [Privacy Policy](#). If you do not want your website visit data reported by the Google Analytics JavaScript, you can install the Google Analytics opt-out browser add-on. This add-on instructs the Google Analytics JavaScript to prohibit sending visit information to Google Analytics, but does not prevent information from being sent to the website itself or in other ways to other website analytics services. Click [here](#) if you would like to learn more about the Google Analytics opt-out browser add-on, and click [here](#) to install the opt-out browser add-on.

Third Party Merchants

If you make a purchase from a third party linked to our Site, the information obtained during your visit to that third party, and the information you give such as your credit card number and contact information, is provided to such third party. This is to enable transactions to take place.

Third parties linked to our Site have separate privacy and data collection practices, and any information that you provide to such third parties will be governed by their respective privacy policies, and not by Hireology's Privacy Policy. Hireology has no responsibility or liability for these independent policies. For more information regarding the third party, their website, and their privacy policies, please see that merchant's website.

From time to time, you may be offered the opportunity to receive materials or special offers from third parties. If you opt in to receive information from these third parties, Hireology will (with your permission) share your name and email address with them.

Statistical Information

"Personal Information" and "User Data" do not include statistical information. By analyzing your use of the Site we may compile certain statistical information, such as anonymous information about how users use the Services. Statistical data helps Hireology understand trends and customer needs so that new products and services can be considered and in order to tailor existing products and services to customer desires. Aggregate statistical information is anonymous and will not be linked to any Personal Information for provision to third parties. We may share such anonymous statistical information with our partners, without restriction, on commercial terms that we can determine in our sole discretion.

Use of Information

We will not use, share, or disclose the information of Data Sources to anyone except as described in this Privacy Policy, in compliance with the instructions of the applicable data controllers, or as otherwise consented to by a Data Source. To better understand how a Data Source's information is processed, please refer to the applicable Customer's privacy policy.

Hireology uses Personal Information and User Data to provide the Services, to customize your user experience and perform other services requested, to fulfill requests for products, services or information, to communicate with you, to provide social media features, and to understand your needs. For example, if you request a free trial, Hireology will use the information provided to contact you about your interest in the Site or the Services.

Hireology may also use Personal Information and User Data for marketing purposes. For example, Hireology may use information you provide to contact you to further discuss your interest in Hireology, the Services, and to send you information regarding Hireology and its partners, such as information about promotions or events.

Hireology uses credit card information solely to check the financial qualifications of prospective Customers, to collect payment for the Services, and to maintain payment records.

Hireology uses Site Navigational Information for analytics, including to understand how you use the Site, to analyze website traffic, to determine the methods and devices used to access the Site, and to operate and improve the Site. Hireology may also use Site Navigational Information in combination with User Data to provide personalized information about Hireology. In addition to the above, Hireology collects and uses Personal Information and User Data you provide for the following purposes:

- To comply with any applicable law, regulation, legal process, or government request;
- To respond to a legitimate claim, or to address our reasonable belief, that you are violating the rights of any third party or any of the agreements or policies that govern your use of our Site or any product or service on our Site;
- To protect against legal liability;
- To protect and defend the rights of Hireology and the services, products, information, and rights of our Site and Services, including but not limited to the security or integrity of the Site and Services;
- To act in urgent circumstances to protect the personal safety of Site users or the public;
- To identify and resolve technical problems concerning our Site, its information, or any of our products or services; and
- In any other way authorized by you or the applicable user, including as permitted by the Terms of Use and any applicable Services Agreement.

Hireology also uses Personal Information in an aggregate form (i.e., not individually attributable to you) for its business analysis, operational, marketing, and other promotional purposes. If we hire other companies to provide some products or services on our behalf, then we will only provide those companies the Personal Information they need for the purposes described in this section, and we will limit their rights to use and further disclose your Personal Information as appropriate in the course of their work for us.

Disclosure, Processing, and Retention

Hireology may share User Data with its agents so that these agents can contact Customers and Visitors who have provided contact information on our behalf. Hireology may also share User Data with its agents to ensure the quality of information provided. In addition, Hireology may share information with social media platforms and networks, such as Facebook, Twitter, and LinkedIn, that offer functionalities, plugins, widgets, or tools in connection with the Site (for example, to share purchases and other content from our website with your friends and followers on social media). If you choose to use these functionalities, plugins, widgets, or tools, certain information will be shared with or collected by those social media companies. Hireology may also share Site Navigational Information collected by our third-party analytics partners with Customers who are hosting their websites with us. Hireology does not share, sell, rent, or trade personally identifiable information with third parties for their promotional purposes.

Hireology uses a third-party intermediary to manage credit card processing. This intermediary is not permitted to store, retain, or use Billing Information except for the sole purpose of credit card processing on Hireology's behalf. We do not sell, rent, or disclose your personal information to anyone else without your permission, except:

- To someone you have designated to act as your agent, for one or more of the purposes listed above under the heading "USE OF INFORMATION" (the "Identified Purposes");
- To Hireology's employees, independent contractors, subsidiaries, joint venturers, affiliates, consultants, business associates, service providers, suppliers, and agents, acting on our behalf for any of the Identified Purposes;
- If Hireology has reason to believe that disclosure is necessary to identify, contact, or bring legal action against someone who may be causing injury to or interference (either intentionally or unintentionally) with Hireology's rights or property, other users of our Site, Services, or other products or services, or anyone else that could be harmed by such activities; and

- To respond to judicial process and provide information to law enforcement agencies or in connection with an investigation on matters related to public safety, as permitted by law, or otherwise as required by law.

In addition, as we continue to develop our business, we or our affiliates may sell or buy other businesses or entities, or we may sell, transfer, or otherwise share some or all of our assets, including Personal Information, User Data, and any other information covered by this Privacy Policy, in connection with a merger, acquisition, reorganization, change of control transaction, sale of assets, or in the event of bankruptcy.

We may retain copies of your User Data, including your Personal Information, even after you have closed your account pursuant to our data retention practices or in order to comply with legal obligations.

Your information may be stored and processed in the United States, or in any other country in which Hireology or its affiliates, subsidiaries, or agents maintain facilities. The laws that apply to the use and protection of personal information in the United States or other countries or jurisdictions in which we transfer or process Personal Information may be different than the laws and protections in your country. By using this Site, you consent to any such transfer of information outside of your country.

Communications Preferences

You may manage your receipt of marketing and non-transactional notifications or communications by clicking on the “unsubscribe” link located at the bottom of Hireology’s marketing e-mails, or, if you are using our mobile application, by adjusting the notification settings on your mobile device. Additionally, you may send a request specifying your communications preferences to support@hireology.com. Customers cannot opt out of receiving transactional e-mails related to their account with Hireology or the Services.

Correcting and Updating your Information

Customers and Data Sources may update or change their registration information by editing their user or organization record. To update a user profile, please log in to your account and use the features and functionalities available there. You may also make a request for access to Personal Information by sending an email or writing to us at the address specified in the “Contacting Us” section below. We are not able to grant all access requests, and we may request additional information from you in order to verify your identity before accommodating an access request. Customers are responsible for informing Hireology about changes to their User Data. Hireology will use new or updated User Data it receives from Customers to update its own records.

Customer Data

Hireology will not review, share, distribute, or reference any Customer User Data except as provided in the applicable Services Agreement or this Privacy Policy, or as may be required by law. Individual records of User Data may be viewed or accessed only for the purposes of resolving a problem, addressing support issues, or investigating a suspected violation of the applicable Services Agreement, or as may be required by law. Customers and their Data Sources are responsible for maintaining the security and confidentiality of their Hireology user names and passwords.

Security

Subject to the Terms of Use and any applicable Services Agreement, Hireology will use commercially reasonable efforts consistent with industry standards to protect User Data and information received from our Customer’s Data Sources from unauthorized access. However, no Internet or email transmission is ever fully secure or error free. Subject to the Terms of Use and any applicable Services Agreement, Hireology will make any legally-required disclosures of any breach of the security, confidentiality, or integrity of unencrypted electronically stored User Data or other information received from Data Sources to affected Customers and Data Sources via email or conspicuous posting on the Site in the most expedient time possible and without unreasonable delay, subject to (i) the legitimate needs of law enforcement, and (ii) any measures necessary to determine the scope of the breach and restore the reasonable integrity of the data system.

Browsers Do Not Track Signals

Some browsers have incorporated “Do Not Track” (DNT) features that can send a signal to the websites you visit indicating that you do not wish to be tracked. There is not yet a common understanding of how to interpret the DNT signal. We currently do not respond to web browser DNT signals.

Children’s Privacy and Parental Controls

The Site is not directed to or intended to be used by individuals under the age of 16, and we do not knowingly request or collect any Personal Information from children under 16 years of age without prior verifiable consent. **IF YOU ARE NOT 16 OR OLDER, YOU MUST NOT USE THE SITE.** Parents should be aware there are parental control tools available online that can be used to prevent children from submitting information online without parental permission or from accessing material that is harmful to minors. If you believe that your child under the age of 16 has submitted Personal Information to us in connection with the Site, and without prior verifiable parental consent, please email us at support@hireology.com so that we can take steps to delete the Personal Information that he or she provided as required in accordance with applicable law.

California Privacy Rights

Under California Civil Code Section 1798.83, individual customers who reside in California and who have an existing business relationship with us may request information about our disclosure of certain categories of personal information to third parties for the third parties’ direct marketing purposes, if any.

To make such a request, send an email with the subject heading “California Privacy Rights” to support@hireology.com. In your request, please attest to the fact that you are a California resident and provide a current California address for our response. Please be aware that not all information sharing is covered by these California privacy rights requirements and only information on covered sharing will be included in our response. This request may be made no more than once per calendar year.

Pursuant to applicable California law, including the California Consumer Privacy Act (CCPA), Hireology makes the following disclosures regarding the personal information Hireology has collected within the last 12 months:

| <u>Category of Personal Information</u> | <u>Category of Source from Which Data is Collected</u> | <u>Purpose of Collection</u> | <u>Category of Third Parties to Whom Data is Disclosed</u> |
|---|--|---|--|
| <u>Contact information:</u> name, e-mail address, mailing address, phone number, date of birth | Directly from customers | To provide the Services, to fulfill requests for products, services or information, to communicate with customers; to market our services | Service Providers |
| <u>Personal information of our customer's candidates</u> | Directly from customers | To provide our services to our customers | Service Providers |
| <u>Information from social media platforms and networks</u> | Social media platforms | Analytics | Service Providers |
| <u>Financial qualification and billing information, such as billing name and address, credit card number, and the number of employees within the organization that will be using the services</u> | Directly from customers | To facilitate payment for our services | Service Providers |
| Automatically collected information such as IP address, device type, browser type | Cookies and other tracking technologies | To gather information about use of the website, to improve the website, and to enhance functionality of the website | Service Providers |

Hireology has not sold consumers' personal information in the twelve (12) months preceding the Effective Date of this Privacy Policy.

If you are a California resident, pursuant to the California Consumer Protection Act (CCPA), you have the right to request:

- the categories of personal information Hireology has collected about you;
- the categories of sources from which your personal information is collected;

- the business or commercial purpose of collecting or selling your personal information;
- the categories of third parties with whom Hireology shares your personal information;
- the specific pieces of personal information Hireology has collected about you;
- the categories of personal information that Hireology has sold about you and the categories of third parties to whom the personal information was sold, if applicable;
- deletion of your personal information; and
- an opt out of having your personal information disclosed or sold to third parties.

To submit a request, or designate an authorized agent to make a request under the CCPA on your behalf, please contact us at support@hireology.com, or (844) 650-0422, or complete the web form located on our [contact us page](#). To verify your identity when you submit a request, we will match the identifying information you provide us to the personal information we have about you. If you have an account with us, we will also verify your identity through our existing authentication practices for your account.

Hireology will not be required to comply with your request to delete your personal information if it is necessary for Hireology to maintain your personal information in order to:

- complete the transaction for which the personal information was collected, provide a good or service requested by you, or reasonably anticipated within the context of Hireology's ongoing business relationship with you, or otherwise perform a contract between you and Hireology;
- detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;
- debug to identify and repair errors that impair existing intended functionality;
- exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;
- comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code;
- engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when Hireology's deletion of the information is likely to render impossible or seriously impair the achievement of such research, if you have provided informed consent;
- to enable solely internal uses that are reasonably aligned with your expectations based on your relationship with Hireology;
- comply with a legal obligation; or
- otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

Hireology will not discriminate against you in the event you exercise any of the aforementioned rights under CCPA, including, but not limited to, by:

- denying goods or services to you;
- charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
- providing a different level or quality of goods or services to you; or
- suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

This Policy is available to consumers with disabilities.

Disputes

Any dispute over privacy or any information described in this Privacy Policy is subject to our Terms of Use and any applicable Services Agreement, including limitations on damages other liability and application of the law of the State of Illinois.

Contacting Us

Any questions about this Privacy Policy should be addressed to support@hireology.com or by mail at: Hireology Inc., 303 E. Wacker Drive, Suite 400, Chicago, Illinois 60601