

Privacy Policy

1. WHO WE ARE

The Website is owned and operated by EmploySee, Inc. (“EmploySee”) EmploySee Inc., a Connecticut Corporation.
350 East 62nd Street, Suite 1N, New York, New York, 10065, USA

2. KEY TERMS

We use certain defined terms used in this Privacy Policy:

The EmploySee Group	EmploySee Inc. and its wholly-owned subsidiaries.
Non-Personal Data	Data that is not considered Personal Data under applicable law. We reserve the right to treat data as Personal Data or Non-Personal Data based on the law applicable to the data and the data subject.
Personal Data	Any information or pieces of information that identifies you or could reasonably be used to identify you or your personal device either directly (e.g., your name) or, where required by applicable law indirectly (e.g., through pseudonymized data, such as a unique ID number). This means that Personal Data includes things like email/home addresses, usernames, user generated content, financial information, and health information. It could also include certain Technical Data (defined below) such as unique numerical identifiers like your computer’s IP address or your mobile device’s MAC address, as well as cookies (“ <u>Device IDs</u> ”), where required by applicable law
Special Categories of Personal Data	Sensitive Personal Data that reveals racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership; Genetic and biometric data; and Data concerning health, sex life or sexual orientation.

3. DATA WE COLLECT ABOUT YOU

A. Personal Data

As permitted by applicable law in the country from which you access our Website and use our Services, we may collect, use, store and transfer different kinds of Personal Data about you. We have grouped these into the following categories of Personal Data:

- “Identity Data” such as first name, maiden name, last name, Seeker Credentials, Social Media profile, username or similar identifier.
- “Contact Data” such as physical address, email address, social media address, telephone number, and any other contact information you provide to us.

- “**Financial Data**” such as payment card details. However, please note that payment methods (e.g., credit card number and/or PayPal and/or bank account details) are not collected by us directly, but by secure payment service providers.
- “**Transaction Data**” such as details about payments to and from you, and details regarding the services that you have subscribed to or purchased through an EmploySee Website.
- “**Technical Data**” such as Device IDs, your login data, access dates and times, browser type and version, device information, cookie data, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Website.
- “**Profile Data**” such as your username and password, orders made by you, preferences, user-generated content, job searches, candidate searches, Interview Requests, feedback and survey responses.
- “**Usage Data**” such as information about how you use our Website, products and services.
- “**Marketing and Communications Data**” such as your preferences in receiving marketing from us and our third-parties and your communication preferences.

B. Non-Personal Data

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your Personal Data but is not considered Personal Data since it does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

C. If You Fail to Provide Personal Data Where Such Data is Required to Provide Services to You

Where we need to collect Personal Data by law, or under the terms of a contract we have with you, or a prospective contract, and you fail to provide that Personal Data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our services). If so, we may have to cancel the service you have with us (or have requested from us), and you accept that as a condition of service.

D. Data That You Should Not Provide to Us

EmploySee does not require any **Special Categories of Personal Data** about you in order for you to utilize the EmploySee Website. If you are submitting your credentials to our database or sharing your credentials with a prospective employer directly using a Interview Request feature on the EmploySee Website, please carefully consider the information that is contained within your credentials and ensure that you are not providing any sensitive or other information that is not necessary for your Interview Request or Seeker search. Before submitting any information, either in your credentials or otherwise to a prospective employer or recruiter, please also review our Terms of Use.

4. HOW DATA IS COLLECTED

We use different methods to collect Personal Data from and about you including, for example:

A. Direct Interaction with Us

You may give us your Identity Data, Contact Data, Financial Data, Profile Data, and other information by filling in forms or by corresponding with us by post, phone, e-mail or otherwise. This includes Personal Data you provide when you:

- Make a purchase
- create an account on our Website
- request information to be sent to you
- submit your credentials to our Seeker database
- give us feedback
- send an Interview Request on our Website
- sign up for email or SMS job alerts
- authorize EmploySee to connect your account to the account of a "**Connected Site**" (e.g., Google, LinkedIn, Monster, Facebook or Twitter), we may be able to access information you have provided to the Connected Site, such as profile information, content information, timeline feeds, contact and follow lists, network statistics, and/or updates regarding your Connected Site account

B. Automated Technologies or Interactions

As you interact with our Website, we may automatically collect Technical Data and Usage Data about your equipment, browsing actions and patterns. We collect this Personal Data and Non-Personal Data by using cookies, server logs and other similar technologies. We may also receive Technical Data and Usage Data about you if you visit other websites employing our cookies and other Tracking Technologies (defined below). For more information regarding our use of Tracking Technologies, please refer to "Cookies and Similar Technologies" below.

C. Third Parties

We may receive Personal Data in the form of Technical Data and Usage Data about you from various third-parties such as analytics providers or advertising networks.

D. EmploySee as a Service Provider (Data Processor)

In certain instances, our clients hire EmploySee to provide services on behalf of the client. In such case, we process Personal Data under the direction of that client (the data controller) and have no direct relationship with the individuals (data subjects) whose Personal Data we process.

Where EmploySee processes your Personal Data in the capacity of a service provider (data processor), and you seek access, or want to correct, amend, or delete your Personal Data, or have other request, we will provide

you with the data controller's contact information, so you can contact them directly. In rare instances, however, circumstances may necessitate EmploySee assisting you with your question or request.

For example, some clients hire EmploySee to send job alert emails to their job seekers who have requested job alert emails from such clients. In these cases, EmploySee acts as a service provider (*i.e.*, data processor) to the client, who is the data controller. When EmploySee provides services in the capacity of a service provider, it acts under the instructions and at the direction of such client (*i.e.*, the data controller). In the foregoing example, if you are a job seeker who has requested job alert emails from one of our clients, the client will provide us certain Personal Data about you (such as your name, email address, the type of job you want, and your preferred geographic location) to ensure that the job alert emails meet your search criteria. If you have questions or requests about your Personal Data with respect to the job alert emails, we will provide you with the data controllers contact information so that you can contact the data controller directly.

5. HOW WE USE YOUR DATA

A. Use of Non-Personal Data

Where permitted by applicable law, we may use your Non-Personal Data for any purpose not prohibited by applicable law or inconsistent with this Privacy Policy or any written representation we have made to you at the point and time of the data collection. Certain non-personal data may be made publicly available through our Seeker Search Database if your profile matches a user's search.

B. Use of Personal Data

We will only use your Personal Data to provide services directly to you (in our capacity as a data controller) and/or to provide services to you on behalf of our clients (in our capacity as a service provider/data processor), except as otherwise described in this Privacy Policy or with your consent. Certain personal data may be made publicly available through our Seeker Search Database if your profile matches a user's search, such as: First name, city, and state.

In the table below, we have described (i) in what context your Personal Data was collected, *i.e.*, what activity you were involved in when we collected or used your Personal Data; (ii) the types of Personal Data that we hold about you; (iii) how and why we use your Personal Data; and (iv) the reasons we hold and use your Personal Data. We will amend the table as required. We have also provided you with an explanation of some of the terms we use in this table:

(a) **'User Experience'** means our goals in conducting and managing our business, to give you the best user experience when using our Website, products, and Services.

(b) **'Performance of Contract'** means processing your Personal Data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

(c) **'Comply with a legal or regulatory obligation'** means processing your Personal Data where it is necessary for compliance with a legal or regulatory obligation to which we are subject.

(d) **'Consent'** means that you consent to our use of your Personal Data for one or more specific purposes. Where we rely on your consent to use your Personal Data, you have the right to withdraw that consent at any time. You can do this by contacting us at support@EmploySee.com. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we

may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

CONTEXT IN WHICH YOUR PERSONAL DATA IS COLLECTED	WHAT PERSONAL DATA WE MAY HOLD ABOUT YOU	HOW WE MAY USE YOUR PERSONAL DATA	THE REASONS WE PROCESS YOUR PERSONAL DATA
Account Creation and Management	<ul style="list-style-type: none"> • Identity • Contact • Billing • Financial • Technical • Transaction • Profile • Other information you have shared with us about yourself (e.g., via your “My Account” page), by contacting us, or a question via the chat function 	<ul style="list-style-type: none"> • To create and manage your account • To communicate with you about your account, and process your order • To manage our relationship with you • To offer you personalized services based on your preferences • To respond to your questions • To send you email job alerts if you registered to receive job alerts • To send you marketing communications (where you have asked us to) which may be tailored to your “profile” (i.e. based on the Personal Data we know about you and your preferences) • To manage payments, fees and charges. Please note that payment methods (e.g., credit card number and/or PayPal and/or bank account details) are not collected by us directly, but by 	<ul style="list-style-type: none"> • To perform our contract with you so you can create your account and use our Services • To optimize your user experience to (i) improve our Services; (ii) better engage with you; (iii) mitigate or prevent fraud; and (iv) secure our tools • Consent – so you can receive job alert emails or marketing communications

CONTEXT IN WHICH YOUR PERSONAL DATA IS COLLECTED	WHAT PERSONAL DATA WE MAY HOLD ABOUT YOU	HOW WE MAY USE YOUR PERSONAL DATA	THE REASONS WE PROCESS YOUR PERSONAL DATA
		<p>secure payment service providers</p> <ul style="list-style-type: none"> • To collect monies owed to us • To run analytics or collect statistics • To manage any surveys, promotions or competitions you entered • To communicate with you regarding our services 	
<p>Newsletter and Marketing Communications</p>	<ul style="list-style-type: none"> • Identity • Contact • Profile Data • Marketing and Communications Data • Other information you have shared with us about yourself (e.g., via your “My Account” page), by contacting us, or a question via the chat function 	<ul style="list-style-type: none"> • To send you marketing communications (where you have asked us to) which may be tailored to your “profile” based on the Personal Data we know or learn about you and your preferences • To send you newsletters where you have indicated an interest or shown an interest based on your preferences as shown by your activity on the Website and/or your profile • To keep your Contact data on a suppression list if you’ve indicated you don’t want to be communicated in a particular way • To run analytics or collect statistics 	<ul style="list-style-type: none"> • To optimize your user experience and provide you with information about EmploySee products and services that may be of interest to you • Consent (where required by applicable law) – so you can receive newsletters, and information about products and services that may be of interest to you

CONTEXT IN WHICH YOUR PERSONAL DATA IS COLLECTED	WHAT PERSONAL DATA WE MAY HOLD ABOUT YOU	HOW WE MAY USE YOUR PERSONAL DATA	THE REASONS WE PROCESS YOUR PERSONAL DATA
<p>Purchases, Subscriptions, and/or Order Management</p>	<ul style="list-style-type: none"> • Identity • Contact • Billing • Financial • Technical • Transaction • Profile • Other information you have shared with us about yourself (<i>e.g.</i>, via your “My Account” page), by contacting us, or a question via the chat function 	<ul style="list-style-type: none"> • To process your order for a subscription or other purchased products or services • To manage payment. Please note that your payment information (credit card number/PayPal/bank account details) are not collected by us directly, but by secure payment service providers • To communicate with you regarding your subscription or purchase • To secure your transaction against fraud. We may use a third-party provider’s solution to detect fraud and make sure that payment is completed • To update your transaction history in your account profile • To perform invoicing, debt collections, or manage payment disputes or issues with the services • To run analytics or collect statistics. 	<ul style="list-style-type: none"> • The performance of a contract – so you can make purchases and we can manage the associated logistics • To optimize your user experience, including but not limited to : (i) improving our products and services; and (ii) preventing fraud • To comply with a legal obligation – to keep information we are required to, <i>e.g.</i>, to comply with our tax and financial reporting obligations with respect to monies you have paid us
<p>Website Administration</p>	<ul style="list-style-type: none"> • Identity • Contact • Technical 	<ul style="list-style-type: none"> • To provide administration and IT services, network security, to prevent fraud 	<ul style="list-style-type: none"> • To optimize your user experience when using our Website and the services and products provided through the Website

CONTEXT IN WHICH YOUR PERSONAL DATA IS COLLECTED	WHAT PERSONAL DATA WE MAY HOLD ABOUT YOU	HOW WE MAY USE YOUR PERSONAL DATA	THE REASONS WE PROCESS YOUR PERSONAL DATA
		<ul style="list-style-type: none"> • To troubleshoot • To perform data analysis, testing, system maintenance, support, reporting and hosting of data • To run analytics or collect statistics • To monitor and improve our website 	<ul style="list-style-type: none"> • To perform our contract with you and provide services to you
<p>Use of Website/Mobile Apps</p>	<ul style="list-style-type: none"> • Identity • Contact • Usage • Profile • Technical • Transaction 	<ul style="list-style-type: none"> • To provide you with the service(s) you requested such as sending your Interview Request, sending you credentials, providing you with products that you've requested, notifying you when your credentials has been viewed • To analyze your preferences and tailor content • To monitor and improve our apps and devices • To run analytics and statistics. 	<ul style="list-style-type: none"> • To provide you with the service(s) you have requested on the devices that you are using to access our Services • To optimize your user experience based on the devices you use to access our Services.
<p>Online Browsing Where your Personal Data may be collected by cookies or similar technologies and data analytics</p>	<ul style="list-style-type: none"> • Usage Data such as where you came from; login details; pages you looked at; duration of your visit; specifics of the services and products you purchased; jobs that you applied to; jobs that you opened; candidate credentials that you viewed; type of jobs you posted; location of jobs 	<ul style="list-style-type: none"> • To improve our Website, products/services and your user experience • To run analytics and collect statistics • To enable our Website to function properly (ensure 	<ul style="list-style-type: none"> • To enhance your user experience based on the device you use to access our Services and the choices you have made, to save your personal settings or preferences • Consent, when required by applicable law and/or the choices you have made, to

CONTEXT IN WHICH YOUR PERSONAL DATA IS COLLECTED	WHAT PERSONAL DATA WE MAY HOLD ABOUT YOU	HOW WE MAY USE YOUR PERSONAL DATA	THE REASONS WE PROCESS YOUR PERSONAL DATA
	<ul style="list-style-type: none"> • Technical Data such as your IP address; browser information; device information; and/or your unique ID and the expiration date of the ID • Identity • Transaction • Profile 	<ul style="list-style-type: none"> proper display of content); create and remember your account login details; interface personalization, such as language, or any user-interface customization (i.e. parameters attached to your device including your screen resolution or font preference), etc. • To understand how you arrived at our Website • We use information derived from cookies together with other Personal Data that you have already shared with us to deliver you information about employment opportunities that may interest you based on the job searches you made on the Website, jobs you applied to or email alerts you signed up for; candidates that may interest you based upon the interview request you sent; the credentials you viewed • To customize our Services for you based upon your activity on the Website, your preferences for certain skillsets or certain jobs • To ensure the proper display of content; to remember your 	<ul style="list-style-type: none"> store cookies on your device

CONTEXT IN WHICH YOUR PERSONAL DATA IS COLLECTED	WHAT PERSONAL DATA WE MAY HOLD ABOUT YOU	HOW WE MAY USE YOUR PERSONAL DATA	THE REASONS WE PROCESS YOUR PERSONAL DATA
		<p>preferences, login and account details, and to improve our websites/apps, for example, by testing new ideas, features, layouts</p> <ul style="list-style-type: none"> • To ensure our websites/apps are secure and safe, and to protect you against fraud or misuse of our websites/apps or services • To run data analytics and collect statistics 	
<p>Promotions Where your Personal Data was collected during a promotion, contest survey or feedback</p>	<ul style="list-style-type: none"> • Identity • Contact • Technical • Usage • Profile 	<ul style="list-style-type: none"> • To receive your contest entry, manage your participation in the promotion, take account of your feedback • To run analytics and statistics; • To send you candidates, jobs or information and products and services that may interest you based on your feedback and suggestions 	<ul style="list-style-type: none"> • The performance of a contract – so you may enter into a promotion, receive notification of results, notification of a prize, and/or any other communications related to the promotion • To manage your responses, reply to your feedback, and communicate with you regarding any recommendations and/or new features or functionality based on your feedback or survey .
<p>User-Generated Content Such as profile, credentials, interview requests, ratings</p>	<ul style="list-style-type: none"> • Identity • Contact • Usage • Profile • Transaction • Technical 	<ul style="list-style-type: none"> • To send your interview request to the Seeker who you've discovered, or to send you credentials of candidates that appear to have the skill set in your interview request 	<ul style="list-style-type: none"> • To provide you with the Services you have requested, including, but not limited to, adding your Seeker Credentials to our Seeker Search Database, facilitating your Interview Request, and/or distributing your content in

CONTEXT IN WHICH YOUR PERSONAL DATA IS COLLECTED	WHAT PERSONAL DATA WE MAY HOLD ABOUT YOU	HOW WE MAY USE YOUR PERSONAL DATA	THE REASONS WE PROCESS YOUR PERSONAL DATA
		<ul style="list-style-type: none"> • To run analytics and statistics • To add the Seekers you've viewed or the interview requests • To add your Seeker Credentials to the 'Seeker Search Database', if you've opted-in on a Website • To help you build your profile during account creation and suggest jobs to you based on your profile and/or credentials 	<p>accordance with any contract we have with you</p>
<p>Enquiries and Messaging Initiated by You Where your Personal Data is collected when you ask questions relating to our services and/or your account</p>	<ul style="list-style-type: none"> • Identity • Contact • Profile • Transaction • Technical • Usage such as content of chats, messages, or enquiries; number of messages you've sent and received; when you viewed a message; who responded to your chats 	<ul style="list-style-type: none"> • To answer and manage your enquiries • To run analytics and statistics • To add your questions or concerns to your profile so we can understand your interests and preferences • To troubleshoot any problems that you are experiencing • We also may use automatic scanning technology on messages to allow us to recognize patterns on our messaging platform to make your professional communications more efficient and informed and 	<ul style="list-style-type: none"> • In order to respond to your enquiries • Where we need to comply with a legal, regulatory, or contractual obligation and/or where we need to communicate with you regarding your use of our products and/or Services

CONTEXT IN WHICH YOUR PERSONAL DATA IS COLLECTED	WHAT PERSONAL DATA WE MAY HOLD ABOUT YOU	HOW WE MAY USE YOUR PERSONAL DATA	THE REASONS WE PROCESS YOUR PERSONAL DATA
		contribute to a safer and more secure job search experience or check links shared in messages for malicious sites and looks for blacklisted keywords to detect spam and fraud.	

6. WHO WE SHARE YOUR DATA WITH

We require all third-parties to respect the security of your Personal Data and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Data for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with our instructions and this Privacy Policy.

A. Personal Data

We may share Personal Data with the following parties:

Internal Parties

- Companies within our corporate family that comprise the EmploySee Group. Access to your Personal Data will be controlled and only granted where necessary to provide our services to you and/or to allow us to perform any necessary or legitimate functions.

External Third-Parties

- Service providers that we use to support our business and/or help provide our services to you, including, but not limited to, third-parties that host our Website, assist us to verify your identity, perform website and platform maintenance, risk assessments, and security, perform data and web analytics, provide databases, IT services, customer service, payment platforms and credit card processing, communication services, and email services. These service providers may be located in the United States and/or other countries.
- Professional advisers, such as lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance, financial, auditing, and accounting services to us so we can operate our business.

- Taxing authorities, such as the Internal Revenue Service and other authorities acting as processors based in the United States, the United Kingdom, and other applicable countries, who require reporting of processing activities in certain circumstances.
- Fraud prevention and identity verification services where we believe that disclosure is necessary or appropriate to protect the rights, property, or safety of EmploySee, our customers or others. This includes exchanging information with third-parties for the purposes of fraud detection and prevention and credit risk reduction.
- In connection with or during negotiations of any proposed or actual financing, merger, purchase, sale, sale or transfer of some or all of our assets or stock, joint venture, or any other type of financing, acquisition or business combination of our company(ies), or all or any portion of our assets, or transfer of all or a portion of our business to another company, including without limitation in the event of a divestiture, restructuring, reorganization, dissolution or other event, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding. In the event of a merger, divestiture, restructuring, reorganization, or other sale or transfer of some or all of our assets or stock, Personal Data that we hold about our clients and users of our services will be one of the assets that will be transferred. If a change happens to our business, the new owners may only use your Personal Data in accordance with this Privacy Policy.
- Third-parties, where you have expressly consented to the disclosure of your Personal Data.
- Law enforcement agencies, courts, supervisory authorities, regulatory bodies and certain other third-parties, to the extent that we are permitted or required to do so by law, or in order to comply with our legal and regulatory obligations, or in the interests of national security, or to respond to verified requests relating to a criminal investigation or alleged or suspected illegal activity.
- To enforce our Terms of Use and other agreements with you, to respond to, and defend ourselves against, claims asserted against us, to protect the rights, property, or safety of EmploySee, our services, customers or others, or to investigate, prevent, or take action regarding suspected or actual illegal activities or for debt collection.
- If you are a job seeker and apply to a job posting on our Website, we will share your Personal Data with:
 - prospective employers and/or their agents, including but not limited to, external Applicant Tracking Systems or any other external systems used by the direct employer to manage the hiring of employees or other categories of workers.
 - prospective employers and/or their agents or representative, if you have opted-in to our Seeker Search Database. You can opt-out of your information being available in our Seeker Search Database at any time by updating this preference on the Profile tab of your Job Seeker account.

- Upon your authorization, the Services may also post information directly to the timeline of your Connected Site Account.
- From time to time, we may run contests, special offers, or other events or activities ("*Events*") on our Services together with a third-party partner. If you provide information to such third parties, you give them permission to use it for the purpose of that Event and any other use that you approve. We cannot control third parties' use of your information. If you do not want your information to be collected by or shared with a third party, you can choose not to participate in these Events.
- For any other purpose disclosed by us when you provide the information or with your consent.

B. Non-Personal Data

Where permitted by applicable law, we may share your Non-Personal Data for any purpose not prohibited by applicable law or inconsistent with this Privacy Policy or any written representation we have made to you at the point and time of the data collection.

7. WHERE YOUR DATA IS TRANSFERED

EmploySee Inc. is headquartered in the United States of America (USA). The information that you provide or that we collect as a result of your interaction with the Website and/or your use of our Services is transferred to the USA and/or to another country where we have a subsidiary or where we have engaged service providers. As a result, your personal data may be subject to data protection and other laws that may differ from your country of residence. Your personal data may be disclosed in response to inquiries or requests from governmental or regulatory authorities in the countries in which we and/or our service providers operate.

8. HOW LONG YOUR DATA WILL BE KEPT

Different retention periods apply for different types of Personal Data and in determining the appropriate retention period, we consider several criteria, including, but not limited to, the purpose for which we hold your Personal Data, our legal, accounting, reporting and/or regulatory obligations in relation to that Personal Data, e.g., financial or tax reporting obligations, whether our relationship with you is ongoing, e.g., where you use more than one of our products and/or services, any specific request you may have made in relation to the deletion of your Personal Data, or where we have a legitimate interest in relation to the management of our own rights, e.g., the defense of any claims. In some circumstances we may anonymize your Personal Data so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you no longer have a relationship with us, we will retain and securely destroy your Personal Data subject to the foregoing and in accordance with applicable laws and regulations. If you request to receive no further contact from us, we will keep some basic information about you on our suppression list in order to avoid sending you unwanted materials in the future.

9. YOUR DATA SUBJECT ACCESS RIGHTS

We respect your privacy rights and provide you with reasonable access and rights to the Personal Data that you may have provided through your use of the Services, in accordance with applicable law.

A. Data Subject Rights

Depending on applicable law, you may have the following rights with respect to your Personal Data:

YOUR RIGHTS	WHAT CAN YOU REQUEST
Right to Information	The right to know what Personal Data we hold about you and how we use it.
Right of Access	The right to be provided with a copy of your Personal Data (subject to certain restrictions).
Right of Rectification	The right to require us to correct any incomplete or inaccurate Personal Data we hold about you, though we may need to verify the accuracy of the new data you provide to us. If you have a user account with us, you also have the option of correcting your information directly in your account.
Right to withdraw consent at any time	You have the right to withdraw your consent at any time where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you have any complaints about how EmploySee handles Personal Data, please send an email to support@EmploySee.com. We welcome the opportunity to help you with any concern or questions you may have about the use of our services, and we will respond to your request within a reasonable timeframe.

For residents located in Nevada: Nevada residents who wish to exercise their sale opt-out rights under Nevada Revised Statutes Chapter 603A may submit a request to this designated address: support@EmploySee.com. However, please know EmploySee does not currently sell data triggering the opt-out requirements under Nevada Revised Statutes Chapter 603A.

For data subjects located in Canada: If you are not satisfied with how we have handled your matter, you may wish to contact the [Office of the Privacy Commissioner of Canada \(OPC\)](#). Residents of Alberta may also obtain information regarding EmploySee’s policies and practices with respect to its non-Canadian service providers by sending an email to support@EmploySee.com. A member of our Data Subject Response Team will respond to any such request.

For data subjects located in Australia: We comply with the Australian Privacy Principles (“**APPs**”), which regulate how we collect, use, disclose, store, correct and protect your Personal Data. If you are not satisfied with how we have handled your matter, you may wish to contact the [Office of the Australian Information Commissioner](#).

Method for Requesting Information Pursuant to Your Rights

If you would like to exercise any of the data subject access rights in the table above (each, an “**Access Request**”) please send an email to support@EmploySee.com, with your specific request. We will respond to your request within a reasonable timeframe.

No Fee Usually Required

You will not usually be required to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances and, in such case, we will notify you within a reasonable timeframe regarding our reasons for refusing to act on your request.

What We May Need from You

Once we receive your Data Subject Request, we may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it.

If we are not clear as to what you are requesting, we may also need to contact you for clarification so we can more fully respond to your request.

If we cannot locate any records about you, we may also ask you for additional information to assist us in locating records, if they exist.

Time Limit to Respond

We try to respond to all legitimate requests within the timeframes required under applicable law. Occasionally it may take us longer than the time period required under applicable law if your request is particularly complex or you have made a number of requests. In this case, we will notify you as to the reason for the delay.

B. Deleting Your Account

If you would like to delete your account, you may log in to your Account Setting on the Website and click “Delete Account” or you can send an email to support@EmploySee.com asking for your account to be deleted. If you close or delete your account, we may still retain certain information for analytical purposes and recordkeeping integrity, as well as to prevent fraud, resolve disputes, enforce our Terms of Use or other policies, take actions we deem necessary due to technical and legal requirements, and as dictated by constraints related to the security, integrity and operation of our Services.

10. CALIFORNIA PRIVACY RIGHTS

California residents have the right to request certain information regarding our disclosure of personal information (as defined by the California Shine the Light Act) to third parties for their direct marketing purposes unless we provide them with an ability to exercise choice regarding such disclosures. We comply with this law by providing California residents with the ability to opt-out of, or prospectively withdraw their consent, if they have previously opted-in to, the disclosure of personal information to third parties for their direct marketing purposes. If you are a California resident, to receive confirmation of how we comply with this law, or to make a request or to opt out at any time, please contact us at support@EmploySee.com or mail us at the address provided in Section 20 below. Any request must include “*California Privacy Rights Request*” in the first line of the description and must include the requestor’s name, street address, city, state, and ZIP code.

11. MARKETING

We may use your Personal Data to send you information about the services provided by the EmploySee Group; provided, however that we will obtain consent to do so where required by applicable law. You may unsubscribe from our marketing e-mails by clicking "Unsubscribe" in any promotional e-mail communications we send you. As permitted by applicable law, you cannot opt-out of non-marketing, services-related notices.

12. COOKIES AND TRACKING TECHNOLOGIES

EmploySee and third parties may use cookies or similar tracking technologies (*e.g.*, pixels, beacons, scripts, etc.) ("Tracking Technologies") to analyze trends, administer the website, track users' movements around the website, and to gather demographic information about our user base as a whole. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our website or service.

If you are accessing the Website from a location outside the EEA or U.K., you understand that we apply U.S. law and the U.S. advertising industry self-regulatory program to Tracking Technologies associated with the Website.

We partner with a third party to either display advertising on our websites or to manage our advertising on other sites. Our third party partner may use cookies or similar technologies in order to provide you advertising based upon your browsing activities and interests. If you wish to opt out of any interest-based advertising please contact us at support@EmploySee.com. Please note that you will continue to receive generic ads.

We use mobile analytics software to allow us to better understand the functionality of our Mobile Software on your phone. This software may record information such as how often you use the application, the events that occur within the application, aggregated usage, performance data and the website from which the application was downloaded.

To the extent permitted by applicable law, we may send you push notifications from time-to-time in order to update you about any events or promotions that we may be running. If you no longer wish to receive these types of communications, you may turn them off at the device level. To ensure you receive proper notifications, we will need to collect certain information about your device such as operating system and user identification information.

13. DATA SECURITY

We use appropriate technical and organizational measures to protect Personal Data we process about you.

However, no transmission of information via the Internet or wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your Personal Data, you acknowledge that there are security and privacy limitations of the Internet which are beyond our control and accordingly, the security, integrity and privacy of data exchanged between you and us through the Website cannot be guaranteed.

We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

The safety and security of your Personal Data also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this

password confidential. We ask you not to share your login or account credentials with anyone and keep your account information secure. We urge you to be careful about giving out information in public areas of the Website like message boards, where information will be available to other users of the Website. If you believe that your access credentials or Personal Data have been compromised, please contact us immediately.

14. LINKS TO THIRD-PARTY WEBSITES AND SOCIAL MEDIA FEATURES

Our Website may from time to time, contain links to third-party services such as websites, locations, platforms, applications or services operated by third parties. If you follow a link to or otherwise access any of these third-party services, these third-party services may use their own cookies, web beacons, and other Tracking Technology to independently collect information about you and may solicit Personal Data from you. Please note that these third-party services have their own privacy policies and we do not accept any responsibility or liability for these parties' policies or practices. Please check these policies before you share any Personal Data with these third-party services.

We may offer you the opportunity to use your social media login when interacting with our Website. If you do so, please be aware that you may be sharing your profile information with us. The Personal Data that is shared will depend on your social media platform settings. Please visit the relevant social media platform and review its privacy policy to understand how your Personal Data is shared and used in this context.

Social media features may also collect your IP address, which page you are visiting on our Website, and may set a cookie or other Tracking Technologies to enable the applicable social media feature to function properly. Your interactions with these features are governed by the privacy policy of the company providing such features.

The Website may include tools provided by us or third-party services that enable you to send a message to another person. If you use any such tools, please ensure that you only send messages to persons to whom you have permission to send messages. Absent the recipient's consent, we will only use their Personal Data that you provide us to facilitate such messages.

15. PUBLIC FORUMS

You should be aware that when you voluntarily disclose any Personal Data in a public forum on the Website, this information, along with any information disclosed in your communication, can be collected and used by third parties and may result in unsolicited messages from third parties. Such activities are beyond our control and this Privacy Policy does not apply to such information. You accept that you, and not EmploySee, are responsible for providing such information in any public forum. Any submissions to public areas on the Website are accepted by you with the understanding that such forums are accessible to all third parties. If you do not want your comments or any content to be viewed by third parties, you are advised not to make any submissions. Please be careful and responsible whenever you're online.

16. INVITATION SERVICE

If you choose to use our invitation service to invite a friend to our Services, we provide you with a link to copy and paste to share with your friends, or spread the word on LinkedIn, Facebook or Twitter. We provide you with a unique link ID so that you earn credit for each friend that joins the site by following your link. Your

friend may contact us to request that we remove this information from our database at support@EmploySee.com.

If you wish to invite a friend to view our blog posts, we will ask you for that person's email address and automatically send an email invitation. EmploySee stores this information to send this email, to register your friend if your invitation is accepted, and to track the success of our invitation service. Your friend may contact us to request that we remove this information from our database at support@EmploySee.com.

17. QUESTIONS OR COMPLAINTS

If you have a complaint, or if you have any questions or requests regarding your Personal Data, please email us at support@EmploySee.com, and specify the country in which you are located. We welcome the opportunity to help you with any concern or questions you have about the use of our services

18. CHANGES TO THIS PRIVACY POLICY

We reserve the right to change this Privacy Policy at any time. If we propose to make any material changes, we will notify you by posting a notice on the Website or by issuing an email to the email address listed by registered users prior to the changes becoming effective. You acknowledge that it is your responsibility to maintain a valid email address as a registered user, and to review the Website and this Privacy Policy periodically in order to be aware of any modifications. If you object to any changes to the revised Privacy Policy, you can stop using our services and close your account with us. However, if you continue to use our services (including the Website) after we publish a new or updated Privacy Policy, you acknowledge that such continued use means that the treatment of your Personal Data will be subject to the new or updated Privacy Policy.

19. MINORS AND CHILDREN

Our Services and the Websites are not intended for use by persons under the age of 18 years. EmploySee does not knowingly collect or solicit Personal Data from anyone under the age of 13 or knowingly allow such persons to register to use our Website. In the event that we learn that we have collected Personal Data of a child under the age of 13, we will delete that data to the extent required by applicable law as quickly as possible. If you believe that we might have any Personal Data from or about a child under 13, please contact us at support@EmploySee.com.