

# Snagajob Privacy Policy

**Last Updated: October 2020**

The Privacy Policy describes the data protection practices of Snagajob.com, Inc. and its affiliated companies (together referred to as "Snagajob" "we," "us," or "our"). This Privacy Policy applies to all websites and mobile applications owned and operated by us that link to this Privacy Policy, and related online and offline services (collectively, the "Services").

Snagajob is a provider of cloud-based software services that help connect businesses ("Employers") looking to hire for employment positions with our network of job and shift seekers ("Seekers"). When applicable we have made distinctions in these sections between Seekers and Employers to be transparent about the different situations in which we may collect, use, or share personal information.

When we handle information about Seekers who use our Services to fill out job applications or onboarding documents/forms for specific Employers or otherwise communicate directly with Employers ("Employer Direct Engagement"), we do so on behalf of the Employers as a service provider or processor. Employers determine how to engage with Seekers through our Services and thus act as the business that determines the purposes and means of handling Seeker data in relation to Employer Direct Engagements. In those circumstances, Seekers are ultimately subject to the privacy policies of the Employers with which they interact, and they should read those policies carefully. Snagajob is not responsible for the privacy practices of Employers. Snagajob acts as the business and not a service provider when Seekers build profiles and use related services.

PLEASE READ THIS PRIVACY POLICY CAREFULLY TO UNDERSTAND HOW WE HANDLE YOUR INFORMATION. By using Snagajob Services, you are expressly and voluntarily accepting the terms and conditions of this Privacy Policy and our [Terms of Use](#) that allow us to process information about you.

## 1. Data We Collect

### A. Data We Collect From Seekers

We collect personal information in order to successfully provide Snagajob Services through the means discussed below. The information we collect and the purpose for which we use it will depend to some extent on the specific Services you use and how you interact with us. The following table describes the categories of information about you that we collect and how we use such information:

| Categories of information collected  | Purposes of use   | Sources of information                                |
|--|---|---|
| <b>Account registration information</b> , e.g. name, DOB, password, email address, username, phone number, wireless device, security questions and answers, city, state, ZIP code, and U.S. work eligibility ("Yes" or "No") | <ul style="list-style-type: none"><li>● Provide the Services</li><li>● Communicate with you</li><li>● Secure our Services and users</li><li>● Fraud prevention and legal purposes</li></ul> | <ul style="list-style-type: none"><li>● You</li></ul> |

|   |  |   |
|---|--|---|
| <p><b>Contact information</b>, e.g. name, email address, postal address, and phone number</p>   | <ul style="list-style-type: none"> <li>● Provide the Services</li> <li>● Application information and employment onboarding</li> <li>● Communicate with you</li> <li>● Personalize your experience</li> <li>● Secure our Services and users</li> <li>● Fraud prevention and legal purposes</li> </ul> | <ul style="list-style-type: none"> <li>● You</li> </ul> |
| <p><b>Profile information</b>, you may have choices about the information included in your profile, such as your name, email address, educational history, employment history, professional licenses, city and state, and bio. In accordance with your profile settings, you may be able to choose whether your profile information is visible to Employers on Snagajob's network or the public at large. Be aware that any information included in your public or shared profile may be read, collected, and used by others who access it.</p> | <ul style="list-style-type: none"> <li>● Provide the Services</li> <li>● Application information and employment onboarding</li> <li>● Personalize your experience</li> <li>● Secure our Services and users</li> <li>● Fraud prevention and legal purposes</li> </ul>                                 | <ul style="list-style-type: none"> <li>● You</li> </ul> |
| <p><b>Demographic and statistical information</b>, e.g. gender, race, age, date of birth, health information, apparel size, marital status, military and veteran status, nationality, disability information, criminal history information, educational history, employment history, professional licenses and memberships, schedule and availability, access to transportation, and responses to tests and surveys.</p>  | <ul style="list-style-type: none"> <li>● Provide the Services</li> <li>● Application information and employment onboarding</li> <li>● Communicate with you</li> <li>● Personalize your experience</li> <li>● Secure our</li> </ul>   | <ul style="list-style-type: none"> <li>● You</li> </ul> |

|  |  |  |
|--|--|--|
|  | <p>Services and users</p> <ul style="list-style-type: none"> <li>● Fraud prevention and legal purposes</li> </ul>  |  |
| <p><b>Personal identifiers and employment eligibility information</b>, e.g. photographs, driver's license number, operator's license number, motor vehicle license number, passport number, Social Security Number, other state or federal-issued identification numbers, and information you provide on tax and other government forms.</p> | <ul style="list-style-type: none"> <li>● Provide the Services</li> <li>● Application information and employment onboarding</li> <li>● Secure our Services and users</li> <li>● Fraud prevention and legal purposes</li> </ul>  | <ul style="list-style-type: none"> <li>● You</li> <li>● Employers</li> </ul>   |
| <p><b>Application responses</b>, e.g. when you submit an application using the Services, we may collect application question responses, documents uploaded for job applications, and results of background checks and identity verification. Some of this information may be added to your Snagajob profile.</p>                             | <ul style="list-style-type: none"> <li>● Provide the Services</li> <li>● Application information and employment onboarding</li> <li>● Communicate with you</li> <li>● Personalize your experience</li> <li>● Secure our Services and users</li> <li>● Fraud prevention and legal purposes</li> </ul> | <ul style="list-style-type: none"> <li>● You</li> <li>● Third party providers, e.g., background check and identity verification</li> </ul> |
| <p><b>Financial and transactional information</b>, e.g. bank account number and paycard information.</p>   | <ul style="list-style-type: none"> <li>● Employment onboarding</li> <li>● Fraud prevention and legal purposes</li> </ul>   | <ul style="list-style-type: none"> <li>● You</li> <li>● Employers</li> </ul>   |
| <p><b>Customer service information</b>, e.g. questions and other messages you address to us directly through online forms, by mail, over the phone, or by post; and summaries or voice recordings of your interactions with our customer support</p>   | <ul style="list-style-type: none"> <li>● Provide the Services</li> <li>● Communicate with you</li> </ul>   | <ul style="list-style-type: none"> <li>● You</li> </ul>  |

|  |   |   |
|--|---|---|
| <p>team.</p>   | <ul style="list-style-type: none"> <li>● Secure our Services and users</li> <li>● Fraud prevention and legal purposes</li> </ul>  |   |
| <p><b>Communications with other users</b>, e.g. your in-Services messages and information surrounding those messages such as the date/time of the communication.</p>   | <ul style="list-style-type: none"> <li>● &gt;Provide the Services</li> <li>● Employment onboarding</li> <li>● Secure our Services and users</li> <li>● Fraud prevention and legal purposes</li> </ul> | <ul style="list-style-type: none"> <li>● You</li> <li>● The Employers you are communicating with</li> </ul>                         |
| <p><b>Research, survey, or sweepstakes information</b>, e.g. if you participate in an internal Snagajob survey or sweepstakes on our Services or areas we can improve, we collect information needed for you to participate (such as contact information) and to fulfill your prize.</p>   | <ul style="list-style-type: none"> <li>● Provide the Services</li> <li>● Communicate with you</li> <li>● Secure our Services and users</li> <li>● Fraud prevention and legal purposes</li> </ul>      | <ul style="list-style-type: none"> <li>● You</li> <li>● Survey partners</li> <li>● Researchers and analysts</li> </ul>              |
| <p><b>Information about others</b>, e.g. if you submit information about your references or former employers; or if you use a "tell-a-friend" tool (or similar feature) that allows you to send information to another person, we will collect, at a minimum, the recipient's contact information. In providing this information, you represent that you are authorized to provide it.</p> | <ul style="list-style-type: none"> <li>● Provide the Services</li> <li>● Employment onboarding</li> <li>● Fraud prevention and legal purposes</li> </ul>  | <ul style="list-style-type: none"> <li>● You</li> <li>● Other users (if you are the recipient of a communication)</li> </ul>        |
| <p><b>Device information and identifiers</b>, e.g. IP address; browser type and language; operating system; platform type; device type; software and hardware attributes; and unique device, advertising, and app identifiers.</p>   | <ul style="list-style-type: none"> <li>● Provide the Services</li> <li>● Personalize your experience</li> <li>● Secure our Services and users</li> <li>● Fraud prevention</li> </ul>                  | <ul style="list-style-type: none"> <li>● You</li> <li>● Analytics providers</li> <li>● Cookies and tracking technologies</li> </ul> |

|  |   |   |
|--|---|---|
|  | and legal purposes  |   |
| <b>Connection and usage data</b> , e.g. information about files you download, domain names, landing pages, browsing activity, dates and times of access, pages viewed, forms you complete or partially complete, search terms, uploads or downloads, whether you open an email and your interaction with email content, access times, error logs, and other similar information. | <ul style="list-style-type: none"> <li>● Provide the Services</li> <li>● Personalize your experience</li> <li>● Secure our Services and users</li> <li>● Fraud prevention and legal purposes</li> </ul>                                 | <ul style="list-style-type: none"> <li>● You</li> <li>● Analytics providers</li> <li>● Cookies and tracking technologies</li> </ul>                     |
| <b>Social media information</b> , e.g. if you access the Services through a third-party connection or log-in, we may have access to log-in information you provide to that social network, information you provide to us directly through our pages on social networking and blogging platforms (e.g. Facebook, Instagram, Snapchat, Wordpress, and Twitter).                    | <ul style="list-style-type: none"> <li>● Provide the Services</li> <li>● Communicate with you</li> <li>● Personalize your experience</li> <li>● Secure our Services and users</li> <li>● Fraud prevention and legal purposes</li> </ul> | <ul style="list-style-type: none"> <li>● You</li> <li>● Social media networks, in accordance with your privacy preferences and such services</li> </ul> |
| <b>Geolocation</b> , e.g. city, state, country, and ZIP code associated with your IP address.  | <ul style="list-style-type: none"> <li>● Provide the Services</li> <li>● Personalize your experience</li> <li>● Secure our Services and users</li> <li>● Fraud prevention and legal purposes</li> </ul>                                 | <ul style="list-style-type: none"> <li>● You</li> <li>● Analytics providers</li> </ul>  |
| <b>Other information</b> , e.g. any other information you choose to directly provide to us in connection with your use of the Services.  | <ul style="list-style-type: none"> <li>● All purposes listed above</li> </ul>   | <ul style="list-style-type: none"> <li>● You</li> </ul>   |

#### B. Data We Collect from and About Employers

We also collect information from Employers to provide the Services. The information we collect and the purpose for which we use it will depend to some extent on the specific Services you use and how you interact with us. The following table describes the categories of information about you that we collect and how we use such information:

|  |  |  |
|--|--|--|
|  |  |  |
|--|--|--|

| Categories of information collected   | Purposes of use   | Sources of information                                  |
|---|---|---|
| <p><b>Account registration information</b>, e.g. name, phone number, email address, postal address, account username, password, security questions and answers.</p>                                 | <ul style="list-style-type: none"> <li>● Provide the Services</li> <li>● Communicate with you</li> <li>● Personalize your experience</li> <li>● Secure our Services and users</li> <li>● Fraud prevention and legal purposes</li> </ul> | <ul style="list-style-type: none"> <li>● You</li> </ul> |
| <p><b>Business or company information</b>, e.g. business name, industry, FEIN, business phone number, location(s), links to external business websites, pictures, business logo.</p>                | <ul style="list-style-type: none"> <li>● Provide the Services</li> <li>● Personalize your experience</li> <li>● Secure our Services and users</li> <li>● Fraud prevention and legal purposes</li> </ul>                                 | <ul style="list-style-type: none"> <li>● You</li> </ul> |
| <p><b>Financial and transactional information</b>, e.g. credit card information, billing address.</p>   | <ul style="list-style-type: none"> <li>● Provide the Services</li> <li>● Fraud detection and prevention</li> <li>● Secure our Services and users</li> <li>● Fraud prevention and legal purposes</li> </ul>                              | <ul style="list-style-type: none"> <li>● You</li> </ul> |
| <p><b>Employment opportunity information</b>, e.g. title, wage range, location(s), availability information, desired qualifications and skills, job description and expectations, job postings.</p> | <ul style="list-style-type: none"> <li>● Provide the Services</li> <li>● Personalize your experience</li> <li>● Communicate with you</li> <li>● Application information and Employment</li> </ul>                                       | <ul style="list-style-type: none"> <li>● You</li> </ul> |

|  | onboarding  |   |
|--|---|---|
| <p><b>Social media information</b>, e.g. if you access the Services through a third-party connection or log-in, we may have access to log-in information you provide to that social network and information you provide to us directly through our pages on social networking and blogging platforms (e.g. Facebook, Instagram, Snapchat, Wordpress, and Twitter).</p>                 | <ul style="list-style-type: none"> <li>• Provide the Services</li> <li>• Communicate with you</li> <li>• Personalize your experience</li> <li>• Secure our Services and users</li> <li>• Fraud prevention and legal purposes</li> </ul> | <ul style="list-style-type: none"> <li>• You</li> <li>• Social media networks, in accordance with your privacy preferences and such services</li> </ul> |
| <p><b>Connection and usage data</b>, e.g. information about files you download, domain names, landing pages, browsing activity, dates and times of access, pages viewed, forms you complete or partially complete, search terms, uploads or downloads, whether you open an email and your interaction with email content, access times, error logs, and other similar information.</p> | <ul style="list-style-type: none"> <li>• Provide the Services</li> <li>• Personalize your experience</li> <li>• Secure our Services and users</li> <li>• Fraud prevention and legal purposes</li> </ul>                                 | <ul style="list-style-type: none"> <li>• You</li> <li>• Analytics providers</li> <li>• Cookies and tracking technologies</li> </ul>                     |
| <p><b>Geolocation</b>, e.g. city, state, country, and ZIP code associated with your IP address or derived through Wi-Fi triangulation.</p>   | <ul style="list-style-type: none"> <li>• Provide the Services</li> <li>• Personalize your experience</li> <li>• Secure our Services and users</li> <li>• Fraud prevention and legal purposes</li> </ul>                                 | <ul style="list-style-type: none"> <li>• You</li> <li>• Analytics providers</li> </ul>  |
| <p><b>Other information</b>, e.g. any other information you choose to directly provide to us in connection with your use of the Services.</p>  | <ul style="list-style-type: none"> <li>• All purposes listed above</li> </ul>   | <ul style="list-style-type: none"> <li>• You</li> </ul>   |

### C. Additional Information

The following information provides additional information about the purposes for collecting and using your information.

## 2. Purposes of Use

### Provide the Services, for example:

- Creating a profile and saving selected job postings
- Displaying job opportunities and potential candidates
- Processing and fulfilling your requests and transactions, including registrations, subscriptions, purchases, and payments
- Assisting you in submitting, requesting, processing, or reviewing an application
- Engaging in analysis, research, measuring and reports to better understand how you use the Services, so we can improve them, develop them, and fix errors
- Administering internal Net Promotor Score surveys
- Sending communications that you have requested on your behalf
- Understanding and resolving app crashes and other issues being reported

### Application information and employment onboarding, for example:

- Applying for a job or shift
- Conducting background check and employment eligibility screenings
- Complying with applicable laws, including federal and state employment law
- Arranging for financial deposits and transactions and relevant trainings
- Facilitating logistics for employment, such as uniform sizing

### Communicate with you, for example:

- Responding to your requests for information and provide you with more effective and efficient customer service and technical support, including to investigate, respond to and resolve incidents and complaints
- Keeping you updated regarding job opportunities, interview requests, application reminders, and/or jobs you may be interested in
- Informing Employers about new applicants to posted jobs, account-specific information, and/or promotions regarding our Services
- Providing you with transactional updates and information about the Services (e.g., inform you about updates to our Services, information about your account, or information about ecommerce transactions that you conduct on the Services)
- In accordance with applicable legal requirements, contacting you by email, postal mail, phone, or SMS regarding our Services. If participating in the Snagajob Info Alerts SMS/MMS/Text Program or any other feature that involves SMS messages, you should review the Snagajob SMS/MMS Terms.



## Personalize your experience, for example:

- Finding and recommending appropriate and eligible job opportunities and candidates
- Sending you personalized newsletters, surveys, and information about Snagajob products and services

## Secure our Services and users, for example:

- Monitoring, preventing, and detecting fraud, such as through verifying your identity
- Combatting spam or other malware or security risks
- Monitoring, enforcing, and improving the security of our Services

## Fraud detection and prevention, defending our legal rights and compliance with the law, for example:

- Complying with any applicable procedures, laws, and regulations where it is necessary for our legitimate interests or the legitimate interests of others
- Establishing, exercising, or defending our legal rights where it is necessary for our legitimate interests or the legitimate interests of others (e.g., to enforce compliance with our Terms of Use, Privacy Policies, or to protect our Services, users, or others)

**Combined Information.** For the purposes discussed in this Privacy Policy, we may combine the information that we collect through the Services with information that we receive from other sources, both online and offline, and use such combined information in accordance with this Privacy Policy.

**Consent.** We may use all the categories of information set forth above for any purpose with your consent.

## 3. Cookies and Online Analytics.

We use a variety of online tracking and analytics tools (e.g., cookies, flash cookies, and pixel tags) to collect and analyze information as you use the Services. Among other things, these technologies allow us to offer you a more tailored experience in the future, by understanding and remembering your particular browsing and usage preferences.

We may also use third-party web analytics services (such as those of Google Analytics, Coremetrics, Mixpanel, and Segment) on our Services to collect and analyze information collected through these technologies to assist us in auditing, research, or reporting; fraud prevention; and providing certain features to you. The types of tracking and analytics tools we and our service providers use for these purposes are:

- “Cookies” are small data files stored on your computer or device to collect information about your use of the Services. Cookies may enable us to recognize you as the same user who used our Services in the past, and relate your use of the Services to other information we have about you. Cookies may also be used to enhance your experience on the Services (for example, by storing your username) and/or to collect general usage and aggregated statistical information. Most browsers can be set to detect cookies and give you an opportunity to reject them, but refusing cookies may, in some cases, limit your use of our Services or features. [Learn more about the use of cookies, including how to manage or delete them.](#) Please note that by blocking, disabling, or managing any or all cookies, you may not have access to certain features or offerings of the Services.
- “Local shared objects,” or “flash cookies,” may be stored on your computer or device using a media player or other software.

Local shared objects operate much like cookies, but cannot be managed in the same way. Depending on how local shared objects are enabled on your computer or device, you may be able to manage them using software settings. For information on managing flash cookies, for example, [click here](#).

- “pixel tag” (also known as a “clear GIF” or “web beacon”) is a tiny image – typically just one-pixel – that can be placed on a web page or in our electronic communications to you in order to help us measure the effectiveness of our content by, for example, counting the number of individuals who visit us online or verifying whether you’ve opened one of our emails or seen one of our web pages.
- **Do Not Track.** Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. We are committed to providing you with meaningful choices about the information collected on our website for online advertising and analytics purposes, and that is why we provide the variety of opt-out mechanisms listed above. However, we do not currently recognize or respond to browser-initiated DNT signals. Learn more about [Do Not Track](#).

## 4. How We Share Data

### A. Seeker Data

We will share the information collected from and about you as discussed above for various business purposes. The chart below explains the categories of third parties with which we may share your information, and the categories of information we may share with each. Additionally, we may share all the categories of information with your consent.

| Third Parties with which we share information and why   | Categories of information shared   |
|---|--|
| <p><b>Service Providers that Perform Services on our Behalf.</b> Such service providers include billing and payment processing, sales, marketing, advertising, data analysis and insight, research, technical support and customer service, fulfillment, data storage, security, fraud prevention, risk audits, and legal services.</p>   | <ul style="list-style-type: none"> <li>• All categories of information we collect may be shared with our service providers</li> </ul>  |
| <p><b>Employers, Services, and Vendors</b> We will share your information with Employers and services when you interact with them, at your request, and in accordance with your account settings. For example, if you click “Apply” for a job posting, we may share information with the relevant Employer and when you complete a job application, we will share your application responses with the relevant Employer. In accordance with your profile settings, we may share your profile information with Employers who are searching for eligible job applicants. Moreover, we may share your information with vendors performing services on behalf of the Employers; for instance, a background check provider, identity verification provider, or payroll provider.</p> | <ul style="list-style-type: none"> <li>• Contact and account registration information</li> <li>• Profile information</li> <li>• Demographic and statistical information</li> <li>• Personal identifiers and employment eligibility information</li> <li>• Application responses</li> <li>• Employment opportunity information</li> <li>• Financial and transactional information</li> <li>• Communications with other</li> </ul> |

|   |  |
|---|--|
|   | <p>users</p> <ul style="list-style-type: none"> <li>• Information about others</li> <li>• Other information</li> </ul>                               |
| <p><b>In Accordance with your Account Settings.</b> You may be able to choose whether your profile information is visible to Employers on Snagajob’s network or the public at large. Be aware that any information included in your public profile may be read, collected, and used by others who access it.</p>  | <ul style="list-style-type: none"> <li>• Profile information</li> </ul>  |
| <p><b>Third Parties for Legal Purposes.</b> By using the Services, you acknowledge and agree that we may access, retain, and disclose the information we collect and maintain about you if required to do so by law or in a good faith belief that such access, retention or disclosure is reasonably necessary to: (a) comply with legal process or a regulatory investigation (e.g. subpoena or court order); (b) enforce our Terms of Service, the Privacy Policy, or other contracts with you, including investigation of potential violations thereof; (c) respond to claims that any content violates the rights of third parties; and/or (d) protect the rights, property or personal safety of Snagajob, its agents and affiliates, its users and/or the public. This includes exchanging information with other companies and organizations for fraud protection, and spam/malware prevention, and similar purposes.</p> | <ul style="list-style-type: none"> <li>• All categories of information we collect may be shared for legal purposes</li> </ul>                        |
| <p><b>Third Parties in a Business Transaction.</b> We may disclose information in connection with a corporate transaction, including for example a merger, investment, acquisition, reorganization, consolidation, bankruptcy, liquidation, or sale of some or all of our assets.</p>   | <ul style="list-style-type: none"> <li>• All categories of information we collect may be shared in connection with a business transaction</li> </ul> |

## B. Employer Data

We will share the information collected from and about you as discussed above for various business purposes. The chart below explains the categories of third parties with which we may share your information, and the categories of information we may share with each. Additionally, we may share all the categories of information with your consent.

| Third Parties with which we share information and why   | Categories of information shared  |
|---|---|
| <p><b>Service Providers that Perform Services on our Behalf.</b> Such service providers include billing and payment processing, sales, marketing, advertising, data analysis and insight, research, technical support and customer service, fulfillment, data storage, security, fraud prevention, risk audits, and legal services.</p> | <ul style="list-style-type: none"> <li>• All categories of information we collect may be shared with our service providers</li> </ul> |
| <p><b>Seekers, Services, and Vendors.</b> We will share your information with Seekers at your request. For example, if you post a job</p>   | <ul style="list-style-type: none"> <li>• Business or employer</li> </ul>  |

|  |  |
|--|--|
| <p>opportunity, we may share the information with relevant Seekers. You may also choose to use one of our third party vendor integrations related to Employer services, such as with a background check provider or payroll provider, and we would share relevant information at your direction to provide those services.</p>   | <p>information</p> <ul style="list-style-type: none"> <li>● Employment opportunity information</li> <li>● Financial and transactional information</li> <li>● Communications with other users</li> <li>● Information about others</li> <li>● Other Information</li> </ul> |
| <p><b>Third Parties for Legal Purposes.</b> By using the Services, you acknowledge and agree that we may access, retain, and disclose the information we collect and maintain about you if required to do so by law or in a good faith belief that such access, retention or disclosure is reasonably necessary to: (a) comply with legal process or a regulatory investigation (e.g. a subpoena or court order); (b) enforce our Terms of Service, this Privacy Policy, or other contracts with you, including investigation of potential violations thereof; (c) respond to claims that any content violates the rights of third parties; and/or (d) protect the rights, property or personal safety of Snagajob, its agents and affiliates, its users and/or the public. This includes exchanging information with other companies and organizations for fraud protection, and spam/malware prevention, and similar purposes.</p> | <ul style="list-style-type: none"> <li>● All categories of information we collect may be shared for legal purposes</li> </ul>  |
| <p><b>Third Parties in a Business Transaction.</b> We may disclose information in connection with a corporate transaction, including for example a merger, investment, acquisition, reorganization, consolidation, bankruptcy, liquidation, or sale of some or all of our assets.</p>  | <ul style="list-style-type: none"> <li>● All categories of information we collect may be shared in connection with a business transaction</li> </ul>   |

## 5. Aggregate/De-Identified Information

We may aggregate and/or de-identify any information collected through the Services so that such information can no longer be linked to you or your device (“Aggregate/De-Identified Information”). We may use Aggregate/De-Identified Information for any purpose, including without limitation for research and marketing purposes, and may also share such data with any third parties, including advertisers, promotional partners, and sponsors, in our discretion.

## 6. Your Choices and Rights

You have certain rights with respect to your information as further described in this Section, in addition to any rights discussed elsewhere in this Privacy Policy. Please note your rights and choices vary depending upon your location.

## Marketing Communications.

You may instruct us not to use your information to contact you by email, postal mail, or phone regarding products, services, promotions and special events that might appeal to your interests by contacting us using the information below. You may do so by logging into your Account and navigating towards Settings and, in commercial email messages, you can opt out by following the instructions located at the bottom of such emails. Removing your name from the email list may take a reasonable amount of time. Please note that, regardless of your request, we may still use and share certain information as permitted by this Privacy Policy or as required by applicable law. For example, you may not opt out of certain operational emails, such as those reflecting our relationship or transactions with you.

## Account information.

We encourage you to periodically review and update your settings and profile information to reflect your job and communication preferences. You can access these settings at any time by logging in. If you would like us to close your account, you can reach out to us and we will do so.

## Privacy Rights for California Residents.

If you are a California resident, California law requires us to provide you with some additional information regarding your rights with respect to your “personal information” (as defined in the California Consumer Privacy Act (“CCPA”).

- **A. Your California Privacy Rights**

If you are a California resident, the CCPA allows you to make certain requests about your personal information. Specifically, the CCPA allows you to request us to:

- Inform you about the categories of personal information we collect or disclose about you; the categories of sources of such information; the business or commercial purpose for collecting your personal information; and the categories of third parties with whom we share/disclose personal information.
  - Provide access to and/or a copy of certain personal information we hold about you.
  - Delete certain personal information we have about you.
  - Provide you with information about the financial incentives that we offer to you, if any.
- The CCPA further provides you with the right to not be discriminated against (as provided for in applicable law) for exercising your rights.

Please note that certain information may be exempt from such requests under California law. For example, we need certain information in order to provide the Service to you. We also will take reasonable steps to verify your identity before responding to a request, which may include, at a minimum, depending on the sensitivity of the information you are requesting and the type of request you are making, verifying your name, email address, phone number, or other information. You are also permitted to designate an authorized agent to submit certain requests on your behalf. In order for an authorized agent to be verified, you must provide the authorized agent with signed, written permission to make such requests or a power of attorney. We may also follow up with you to verify your identity before processing the authorized agent’s request. Certain information may be exempt from such requests under applicable law. For example, we need certain types of information so that we can provide the Services to you or to comply with a legal obligation. In some circumstances if you still ask us to delete your information, you

may no longer be able to access or use our Services. If you would like further information regarding your legal rights under California law or would like to exercise any of them, please use the [form on the Snagajob Knowledge Base](#) or contact us at [customersupport@snagajob.com](mailto:customersupport@snagajob.com)

*With regard to personal information collected by Employers through Employer Direct Engagements, Seekers should direct requests to exercise applicable rights to the Employer on whose behalf we handle the data. If we receive a request from a Seeker directly in relation to information collected through an Employer Direct Engagement, we will refer that request to the appropriate Employer(s) and await each Employer's instructions on how to handle it.*

## **B. Collection, Use, and Disclosure of Californians' Personal Information**

During the 12 months leading up to the effective date of this Privacy Policy, we collected (and continue to collect) account registration information, contact information, profile information, demographic and statistical information, business or company information, personal identifiers and employment eligibility information, application responses, financial and transactional information, employment opportunity information, customer service information, communications with other users, research, survey, or sweepstakes information, information about others, device information and identifiers, connection and usage data, social media information, geolocation, and other information, as described in the "Data We Collect" section of our Privacy Policy.

This data was and continues to be used for providing our Services, facilitating employment applications, employment onboarding, sending communications, personalizing the Services, engaging in transactions, improving the Services, securing our Services and users, detecting and preventing fraud, defending our legal rights, and complying with the law, as described in more detail in the "Purpose of Use" section of this Privacy Policy.

During those 12 months, we disclosed personal information with consumers' consent, in the ways described in Section C. below, and with service providers, Seekers and Employers (and related services and vendors), and third parties for legal purposes, as described in the "How We Share Data" section of this Privacy Policy.

## **C. Notice of Right to Opt-Out of Sale of Personal Information**

California residents may opt out of the "sale" of their personal information. The CCPA broadly defines of "sale" in a way that may include when we share your information with Employers and others to provide you with job and other offers and opportunities that may be of interest to you. Depending on what Services you use, we may provide your profile information, such as your contact information (like your name, email address, and phone number), demographic and statistical information (like your educational history, employment history, and professional licenses), geolocation (like your city and state), and user-generated content (like your bio).

If you would like to opt out of Snagajob's use of your information for such purposes that are considered a "sale" under California law, you may do so as outlined on the following page: [Do Not Sell My Personal Information](#). You can also submit a sale opt-out request by emailing us at [donotsell@snagajob.com](mailto:donotsell@snagajob.com). Please be aware that if you submit a sale opt-out request, your profile information may still be visible to Employers on Snagajob's network who are searching for eligible job applicants or the public at large in accordance with your profile settings. You can adjust your profile settings by visiting this [page](#). Please note that we do not knowingly sell the personal information of minors under 16 years of age without legally-required affirmative authorization.

## **D. California "Shine the Light" Disclosure.**

The California "Shine the Light" law gives residents of California the right under certain circumstances to opt out of the sharing of certain categories of personal information (as defined in the Shine the Light law) with third parties for their direct marketing purposes. We do not share your personal information with third parties for their own direct marketing purposes.

# Privacy Rights for Nevada Residents.

Under Nevada law, certain Nevada residents may opt out of the “sale” of “covered information” (as such term is defined under Nevada law) for monetary consideration to a person for that person to license or sell such information to additional persons. “Covered information” includes first and last name, address, email address, phone number, Social Security Number, or an identifier that allows a specific person to be contacted either physically or online.

We do not engage in such activity; however, if you are a Nevada resident who has purchased or leased goods or services from us, you may submit a request to opt out of the sale of your covered information under Nevada law by emailing us at [customersupport@snagajob.com](mailto:customersupport@snagajob.com). Please note we will take reasonable steps to verify your identity and the authenticity of the request.

## 7. How We Protect Your Data and Our Services

We take measures to protect your information against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure, and access. However, no method of transmission over the internet, and no means of electronic or physical storage, is absolutely secure. By using our Services, you acknowledge and accept that we cannot guarantee the security of your information and that use of our Services is at your own risk. You are responsible for keeping your account information—and especially your login information—confidential. We ask you not to share your login credentials with anyone.

When you sign up for an account, you may be required to establish a username and password. If you create an account with us, you are responsible for maintaining the confidentiality of your account password and for any activity that occurs under your account. We are not responsible for any loss or damage arising from your failure to maintain the confidentiality of your password.

If you use messaging features that allow you to interact with Employers or Seekers directly through our Services, please note that these communications are not encrypted and, for security purposes, you should not include any passwords, social security numbers, payment card information, or other sensitive information in such communications.

We have implemented the Invisible reCAPTCHA on our Website. Your use of the Invisible reCAPTCHA is subject to the Google [Privacy Policy](#) and [Terms of Use](#).

## 8. Retention of your Information

We store and maintain your information for the purposes for which it is processed by us. The length of time for which we retain information depends on the purposes for which we collected and use it and/or as required to comply with applicable laws.

## 9. Your Obligations

As discussed further in our [Terms of Use](#), Seekers and Employers have obligations that they must abide by in order to use the Services:

1. You must, at all times, abide by the terms and conditions of the then-current Privacy Policy and [Terms of Use](#). This includes respecting all intellectual property rights that may belong to third parties.
2. You must keep your username and password confidential and not share it with others
3. Any violation of these guidelines may lead to the restriction, suspension or termination of your account at our sole discretion.

## 10. Third-Party Links and Features

The Services contain links to third-party services, and you may also integrate our Services with third-party services. For example, Seeker may click a job application link that takes them to a third-party website hosted by an Employer or a third-party. If you choose to use these third-party services or features, you may disclose your information not just to those third parties but also to their users and the public more generally, depending on how their services function. Snagajob is not responsible for the content or practices of such third-party services. The collection, use, and disclosure of your information will be subject to the privacy policies of the third-party services, and not this Privacy Policy. We urge you to read the privacy and security policies of these third parties.

## 11. Children’s Privacy

The Services are not intended for children under 13 years of age and we do not knowingly collect, maintain, or use Personal Information from children under 13 years of age. We will take reasonable steps to delete personal information (as defined by the United States Children’s Online Privacy Protection Act) as soon as reasonably possible if we learn that we have inadvertently collected it from children under the age of 13 without parental consent.

If you learn that your child has provided us with Personal Information without your consent, you may alert us at [security@snagajob.com](mailto:security@snagajob.com). If we learn that we have collected any Personal Information from children under 13, we will promptly take steps to delete such information and terminate the child’s account.

## 12. Changes to our Privacy Policy

We reserve the right to amend this Privacy Policy at any time. We will make the revised Privacy Policy accessible through the Services, so you should review the Policy periodically. You can know if the Privacy Policy has changed since the last time you reviewed it by checking the “Effective Date” at the beginning of this Privacy Policy. If we make a material change to this Privacy Policy, we will provide you with notice in accordance with legal requirements. By continuing to use the Services, you are confirming that you have read and understood the latest version of this Privacy Policy.

## 13. Contact Information

If you wish to contact us or have any questions about or complaints in relation to this Privacy Policy, please email us at [info@snagajob.com](mailto:info@snagajob.com) or use our online [contact us form](#). Please note that your communications with us may not necessarily be secure. Therefore, please do not include credit card information and/or other sensitive information in your communications with us.