

Snagajob Privacy Policy

This Privacy Policy will be effective as of January 5, 2023. You can review our current Privacy Policy by selecting Version 3.3 from the drop down menu above.

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 should carefully review the privacy policies of the Employers with which they interact. 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.

If you are a California resident and would like to see a summary of the privacy disclosures applicable to you, please [click here](#) for our California Privacy Notice.

1. The Information We Collect

A. Information You Provide to Us

In connection with your visits and interactions with us through the Services, we may collect information from you. The following describes common types of information you may provide us.

Information from Seekers

- **Account Creation.** When you create an account to use the Services, we may collect certain information you provide us, such as contact information, other registration and account information (such as username, password, and work history and preferences), and account security information.
- **Profile Creation.** When you create a profile on the Services, we may collect certain information you provide us, such as contact information (including your name, phone number, and email address), educational and work history and compensation, date of birth, skills, interests, citizenship status and U.S. work eligibility, references, job and career preferences, location and postal address information (including city, state, and ZIP code), and other profile information (such as your bio and picture). 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.

- **Job Application Process.** When you apply for a job using the Services, you may provide contact information (including your name, phone number, and email address), date of birth, educational and work history and compensation, professional licenses, skills, and memberships, interests, citizenship status and U.S. work eligibility, job and career preferences, location and postal address information (including city, state, and ZIP code), demographic information (such as gender, military status, race, ethnicity, or national origin), government and work identifiers and licenses, application question responses, schedule and availability, access to transportation, responses to tests and surveys, and documents uploaded for job applications. Some of this information may be added to your Snagajob profile, which you may edit at any time.
- **Communications.** If you contact us, we may receive information such as your name, email address, and phone number. We also will receive the contents of any communications you have with us. This might include requests, questions, and/or issues regarding your account, profile, or applications, our Services, or other topics you might raise.
- **Audio or Visual Information,** such as audio recordings if you call our customer service.
- **Surveys, Promotions, and Sweepstakes.** If you decide to participate in any surveys, promotions, or sweepstakes, you may provide certain information, such as basic contact information and other information relevant to the survey, promotion, or sweepstakes.

Information from Employers

- **Account, Contact, and Business Information.** When you create an account to use the Services, we may collect certain information you provide us, such as contact information (including name, phone number, email address, postal address), business information (including business name, industry, FEIN, phone number, locations, links to external business websites, pictures, and business logo), other registration and account information (such as username and password), and account security information.
- **Financial and Transactional Information.** If we need to make payments to you or receive payments from you, we may collect financial account and related transactional information.
- **Employment Opportunity Information,** such as title, wage range, locations, availability, desired qualifications and skills, job descriptions and expectations, and job postings.

Information from Suppliers, Business Partners, and Similar Businesses

- **Contact and Business Information.** If you are a company or other organization that we engage with, we may collect your name, phone number, email address, and postal address, government identifier, and business name, industry, locations, other information related to your employer, and any other information you choose to provide us, including through third-party portals and platforms.
- **Financial and Transactional Information.** If we need to make payments to you or receive payments from you, we may collect financial account and related transactional information.
- **Communications.** If you contact us, we may receive information such as your name, email address, and phone number. We also will receive the contents of any communications you have with us. This might include requests, questions, and/or issues regarding your food orders, your account, our Services, or other topics you might raise.
- **Events and Programs.** If you register for or attend an event or program that we host, sponsor, or attend, we may receive information such as your name, email address, phone number, and other information related to your attendance at the event or program from those who interact with or express interest in us or our Services.

- **Surveys, Promotions, and Sweepstakes.** If you decide to participate in any surveys, promotions, or sweepstakes, you may provide certain information, such as basic contact information and other information relevant to the survey, promotion, or sweepstakes.

B. Information We Collect Through Automated Means

We may also automatically collect information from you in relation to your use of the Services or engagement with us:

- **Usage Data.** We may collect and analyze information about how you use our Services. This information includes the dates and times you access our Services, the features you use and the pages you visit, the type(s) of browser through which you access our Services, the content you upload or post to our Services, error logs and other system activity, and the webs or applications through or from which you access our Services.
- **Device Data.** We collect and analyze information about the device(s) you use to access our Services. This information might include your IP address, information about your device's hardware, the operating system on your device and the version of that operating system, your language preferences, unique device identifiers, advertising identifiers, and information about the mobile network you use.
- **Location Information.** When you use the Services, we and our service providers may collect precise location information (in accordance with your device settings and permissions) as well as collect general location information from your computer or mobile device. "General" location information means information to identify the city and state in which your device is located based on its IP address. This information allows us to give you access to content that varies based on your general location (e.g., nearby locations or delivery status). We will ask your permission before collecting your precise GPS location information. In such instances, we may use your precise geo-location information to provide customized services, content, and other information that may be of interest to you. Please note that precise geolocation information is considered "sensitive personal information" under certain privacy laws, and we process this information in accordance with applicable legal requirements. You can disable geolocation tracking on your device. For more information, see the "Your Rights and Choices" section below.
- **Information from Cookies and Similar Technologies.** We and our service providers collect information through the use of "cookies" and similar technologies, such as tracking pixels, to understand how you navigate through and interact with our Services, to learn what content is popular, to enhance the Services and provide you with a more relevant and personalized experience, for authentication and advertising purposes, to save your preferences, and to collect certain usage, device and location information as described above. We may also collect this kind of information when you interact with email messages or other communications we send you. Cookies are small text files that web servers place on your device; they are designed to store basic information and to help websites and apps recognize your browser. We may use both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be accessed every time you use our Services. Tracking pixels (sometimes referred to as web beacons or clear GIFs) are tiny electronic tags with a unique identifier embedded in websites, online ads, and/or email; they are designed to collect usage information like ad impressions or clicks and email open rates, measure the popularity of our Services and associated advertising, and access cookies. We and our vendors (including Adobe Analytics and Google Analytics) also use these technologies and the information collected by them for advertising and data analytics purposes. You can find more information about Adobe's advertising and analytics practices at adobe.com/privacy/experience-cloud.html. You can find more information about Google's analytics practices at google.com/policies/privacy/partners.

C. Information We Collect Through Third Parties

We may collect information about you from third parties, including the following:

- **Employers, Business Partners, Service Providers, and Researchers.** We use business partners, service providers (such as payment processors, survey providers, and analytics providers), and researchers to perform services on our behalf. Some of these partners may have access to information about you that we may or may not otherwise have (for example, where you sign up directly with or otherwise engage with that provider) and may disclose some or all of this information with us. We may also

receive results of background and identity verification checks.

- **Log-in Services and Social Network Information.** If you access the Services through a third-party connection or log-in (e.g., through a social network), you may allow us to have access to and store certain information from your social network profile. This information may include your name, profile picture, your “likes,” and your list of friends, depending on your settings on such services. If you do not wish to have this information disclosed, do not use a social networking connection to access the Services. For a description of how social networking sites handle your information, please refer to their privacy policies and terms of use, which may permit you to modify your privacy settings.
- **Other Account Holders or Users.** Another account holder or user may provide us with your information, such as contact information in relation to an order or a referral program. If you submit someone else’s personal information to us, you represent that you are authorized to provide this information to us.

D. California Notice of Collection

If you are a California resident, please [click here](#) to see our California Notice of Collection for information about our privacy practices in accordance with California law.

2. How We Use the Information We Collect

We and our service providers use the information we collect from and about you for the following business and operational purposes:

- Provide, improve, enhance, personalize, and promote our Services, including creating a profile and saving selected job postings, displaying job opportunities and potential candidates, and facilitating applications and related checks and screenings
- Analyze use of our Services and engaging in related analysis, research, and measuring to better understand how you use the Services, so we can improve them, develop them, and fix errors
- Manage, verify, and authenticate your information, account, and interactions with us
- Communicate with you, including sending communications that you have requested on your behalf, keeping you updated regarding job opportunities, interview requests, application reminders, or jobs you may be interested in, or new applicants to posted jobs, account-specific information, and/or promotions regarding our Services, and for marketing and promotional purposes
- Facilitate requests and applications
- For Employers, to facilitate payments, including arranging for financial deposits and transactions
- Gain insights into prospective customers that might have an interest in our Services
- Provide customer support, including responding to questions, requests, and issues
- Conduct research and improve and develop our Services and partnerships
- Secure our Services and find and help prevent fraud and abuse
- Understand, detect, and resolve problems with the Services
- Resolve disputes, protect ourselves, our users, and others, exercise our legal rights and enforce any legal terms that govern use of our Services
- Comply with laws, regulations, and other legal process and procedures

We may combine the information we collect through the Services with information we collect automatically or receive from other sources and use such combined information in accordance with this Policy. Your browsing activity may be tracked across different websites and different devices or apps. For example, we may attempt to match your browsing activity on your mobile device with your browsing activity on your laptop. To do this our technology partners may disclose data, such as your browsing patterns, geo-location

and device identifiers, and will match the information of the browser and devices that appear to be used by the same person.

3. Online and Mobile App Advertising

A. Online Advertising

We may allow third-party advertising technologies (e.g., ad networks and ad servers such as Google’s ad services, and others) on our Services that use cookies and similar technologies to deliver relevant and targeted content and advertising to you on the Services and other websites you visit and applications you use. The ads may be based on various factors such as the content of the page you are visiting, information you provide, your searches and browsing activity. These ads may be based on your current activity or your activity over time and across other websites and online services and may be tailored to your interests.

The use of cookies or other tracking technologies that may be placed on devices you use to access our Services by non-affiliated third parties is governed by the privacy policies of those third parties. If you are interested in more information about tailored browser advertising and how you can generally control cookies from being put on your devices to deliver tailored advertising, you may visit the [Network Advertising Initiative’s Consumer Opt-Out link](#) or the [Digital Advertising Alliance’s Consumer Opt-Out link](#) to opt out of receiving tailored advertising from companies that participate in those programs. To opt out of Adobe Audience Manager, visit adobe.com/privacy/opt-out.html#customeruse. To opt out of Google Analytics for display advertising, or customize Google display network ads, visit the [Google Ads Settings page](#). To prevent Google Analytics from using your information for analytics, you may install the [Google Analytics Opt-Out Browser Add-on](#). To generally update your cookies settings to notify you when a cookie is being set or updated or to disable cookies altogether, please consult your web browser settings. Please note that if you delete or choose not to accept cookies from us, you may miss out on certain features of our Services.

For additional ways to opt out of targeted advertising activities under applicable law, see the “Your Rights and Choices” section below.

Please note that these opt-outs apply per browser and per device, so you will have to opt out for each device—and each browser on each device—through which you access our Services. In addition, the opt-outs do not apply to advertisements in mobile applications. See the “Mobile App Advertising” section below to learn how to opt out of mobile app advertising.

B. Mobile App Advertising

We may use third-party service providers to deliver ads on other mobile apps or for mobile app analytics based on your interactions on our platform. Each operating system (iOS for Apple phones, Android for Android devices, and Windows for Microsoft devices) provides its own instructions on how to prevent the use of advertising identifiers for tailored in-application advertisements. Because we do not control how the applicable platform operator allows you to control receiving personalized in-application advertisements, you should review the support materials and/or the device settings for the respective operating systems for information on opting out of this use of your advertising identifiers.

C. Notice Concerning Do Not Track

Do Not Track (“DNT”) is a privacy preference that is available in certain web browsers. We are committed to providing you with meaningful choices about the information collected on our website for third party purposes, which is why we describe a variety of opt-

out mechanisms above. However, we do not currently recognize or respond to browser-initiated DNT signals. Learn more about [Do Not Track](#). Please note that Do Not Track is a different privacy mechanism than the user “preference signal” referenced in the “Your Rights and Choices” section below, which is a browser-based control that indicates whether you would like to opt out of processing of your information for certain purposes, such as the “sale” of your information or the disclosure of your information for targeted advertising purposes, under applicable laws.

4. How We Disclose Information We Collect

We and our service providers disclose the information we collect from and about you for the following business and operational purposes:

- **Employers and Vendors.** We may provide access to or disclose your information, as a Seeker, with Employers (or service providers acting on behalf of an employer) 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 disclose information with the relevant Employer (or a services provider acting on behalf of the employer) and when you complete a job application, we will disclose your application responses with the relevant Employer (or a service provider acting on behalf of an employer). In accordance with your profile settings, we may disclose your profile information with Employers who are searching for eligible job applicants. Moreover, we may disclose your information with vendors performing services on behalf of the Employers; for instance, a background check provider, identity verification provider, or payroll provider.
- **Seekers.** We may provide access to or disclose your information, as an Employer, with Seekers at your request. For example, if you post a job opportunity, we may disclose 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 disclose relevant information at your direction to provide those services.
- **Service Providers.** We provide access to or disclose your information to third parties that perform services on our behalf, such as billing, payment processing, advertising, web and other analytics, data storage and processing, customer support, security, fraud prevention, and other services.
- **For Legal Reasons or the Protection of Us and Others.** We will disclose the information we collect about you if required by law or legal process or if we believe in good faith that disclosure is reasonably necessary to: (i) enforce our Terms of Use, this Privacy Policy, or other contracts with you, including investigation of potential violations thereof; (ii) respond to claims that any content violates the rights of third parties; and/or (iii) protect the rights, property or personal safety of Snagajob, users of our Services, and/or others. This includes exchanging information with other companies and organizations for fraud protection, spam/malware prevention, and similar purposes.
- **Business Transfers.** In the event of sale (of some or all of our assets), transfer, merger, reorganization, dissolution, or similar event involving our business (including in contemplation of such transactions), your information may be among the transferred business assets. If such transfer is subject to any mandatory restrictions under applicable laws, we will comply with those restrictions.
- **Your Consent.** If you consent to our disclosure of your information, including through account settings, we will disclose your information consistent with your consent and account settings. For instance, 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.

5. Aggregate/De-Identified Information

We may aggregate and/or de-identify 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 Rights and Choices

In addition to the other rights and choices described in this Privacy Policy, you may have the following rights and choices regarding your information.

A. Rights Regarding Your Information. Depending on your jurisdiction, you may have the right to make certain requests regarding your “personal information” or “personal data” and (as such terms are defined under applicable law, and collectively referred to herein as “personal information”). Specifically, you may have the right to ask 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 disclose personal information.
- Provide you access to and/or a copy of certain personal information we hold about you.
- Correct or update 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.
- Opt you out of the processing of your personal information for purposes of profiling in furtherance of decisions that produce legal or similarly significant effects, if applicable.

You may also have the right to opt out of “sales” of your information and “sharing/use of your information for targeted advertising” as described below.

As provided in applicable law, you also have the right to not be discriminated against for exercising your rights. Please note that certain information may be exempt from such requests under applicable law. For example, we need to retain certain information in order to provide our services to you. We also need to 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 and email address. Depending on your jurisdiction, you may be 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. If you would like further information regarding your legal rights or would like to exercise any of them, please use [this form](#).

Depending on applicable law, you may have the right to appeal our decision to deny your request, if applicable. If we deny your request, we will provide you with information on how to appeal the decision, if applicable, in our communications with you. To exercise such an appeal right, email legal@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. Marketing Communications. You can unsubscribe from our marketing emails via the unsubscribe link provided in the emails or by emailing us at connect@snagajob.com. If you receive an unwanted SMS or text message from us, you may reply STOP to opt out of receiving future messages. Please note that it may take us some time, consistent with our legal obligations, to process your request. Even if you opt out from receiving marketing messages from us, you will continue to receive administrative messages from us, such as order confirmations, updates to our policies and practices, or other communications regarding our relationship or transactions with you.

C. Mobile Devices. We may send you push notifications through our mobile app. You may at any time opt out from receiving these types of communications by changing the settings on your mobile device. If you granted us permission to collect your precise GPS location information and you no longer wish for us and our service providers to collect and use such information, you may disable the location features on your device through the device's operating system settings. Please note that if you disable such features, you may not be able to access or receive some or all of the services, content, and/or features made available via the Services.

D. 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.

E. Notice of Right to Opt Out of Sales of Personal Information and Processing/Sharing of Personal Information for Targeted Advertising Purposes. Depending on your jurisdiction, you may also have the right to opt out of "sales" of your information and "sharing"/use of your information for "targeted advertising."

We also provide personal information to third-party advertising providers for targeted advertising purposes, so that we can provide you with more relevant and tailored ads regarding our services, or use analytics partners to assist us in analyzing use of our services and our user/customer base. The disclosure of your personal information to these third parties to assist us in providing these services may be considered a "sale" of personal information under applicable law, or the processing/sharing of personal information for targeted advertising purposes.

If you would like to opt out of our online disclosure such as through cookie and pixel technology of your personal information for purposes that could be considered "sales" for those third parties' own commercial purposes, or "sharing" for purposes of targeted advertising, please review the information and follow the instructions in the "[Online and Mobile App Advertising](#)" section above and in the "[Instructions For Opting Out of Online Disclosures](#)" section of the California Privacy Notice. You can also submit a request to opt out of our offline disclosures of information that are subject to applicable opt-out rights by visiting this [link](#). Depending on your jurisdiction, you may be permitted to designate an authorized agent to submit such requests on your behalf. Please note that we do not knowingly sell the personal information of minors under 16 years of age without legally-required affirmative authorization.

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 if you have a legally-recognized browser-based opt out preference signal turned on via your device browser, we recognize such preference in accordance with applicable law.

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 please email us at nevadaoptout@snagajob.com.

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. 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.

9. 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, a 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.

10. 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. 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.

11. 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 Privacy Policy periodically. You can know if the Privacy Policy has changed since the last time you reviewed it by checking the “Last Updated” 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.

12. 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 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.