

Talent Square Privacy Policy

Effective date: 21st September 2024

Welcome to Talent Square (“we”, “us” or “Talent Square”). We use job vacancy data (“Hiring Data”) to support talent acquisition for businesses (“you”). This Privacy Policy explains how we collect, use, and share your personal data when you access or use our platform (“Platform”), and the rights you have concerning your data (our “Services”). By accessing or using our platform, you agree to the collection and use of your personal data in accordance with this Privacy Policy. If you do not agree with this policy, please do not use our services.

This Privacy Policy is designed to comply with data protection laws in the United States, including the California Consumer Privacy Act (the “CCPA”), and the General Data Protection Regulation (EU) 2016/679 (the “GDPR”) in the European Union. We strive to meet the highest standards of data protection and ensure transparency in our data processing practices.

- (A) Unless otherwise defined in this Privacy Policy, terms used have the same meaning as in the Terms & Conditions.
- (B) This Privacy Policy was last modified on the effective date indicated at the top of the Privacy Policy and may be updated to reflect changes in legislation.
- (C) We do not knowingly collect or ask for information from people under the age of 16. If you are such a person, please do not use our service or send us your information. We delete information that we learn is collected from a person under the age of 16 without verified parental consent.

1 Who processes your personal data?

- 1.1 Your personal data are being processed by our company **Talent Square LLC**, with its registered Lansing St SE 2143, Grand Rapids, Michigan, 49506, US (the „Controller“, “we”, “us” or “our”).
- 1.2 To learn more about personal data management or if you have any other questions, you're welcome to contact us.
- 1.3 **This Privacy Policy only covers data collection and processing undertaken by Talent Square. The Privacy Policy does not address, nor we are not responsible or directly or indirectly liable for, the privacy practices of your use of the Services.**

2 What personal data is collected?

We may collect the following types of information about you:

2.1 Personal Data

We may collect information that may identify you, provided by you voluntarily when you use our Services. This includes:

- **Personal Identification Information:** This includes your first name, last name, email address, company position, phone number, mailing address, contact information and any other information that may identify you that you provide when registering or using our services.

2.2 Technical Information

We may collect information that alone does not identify you, but when aggregated with other information may identify you, when you use our Services. This includes:

- **Usage Data:** We collect information about how you use our platform, such as the pages you visit, the features you use, the time you spend on our site, and other analytical data.
- **Technical Information:** This includes your IP address, browser type, operating system, device information, and other technical details that help us optimize the platform's performance.
- **Cookies and Tracking Data:** We use cookies and similar technologies to track your activity on our platform and store certain information. This helps us provide a personalized experience and improve our services.

We and/or our authorised external service providers (*as stated in this Privacy Policy*) may automatically collect the above technical data when you visit or interact with our Services.

2.3 Cookies

2.3.1 We sometimes place small data files called cookies and similar technologies on your device. A cookie is a small text file that the website saves on your device when you visit it. Session-based cookies last only while your browser is open and are automatically deleted when you close your browser. Permanent cookies last until you or your browser delete them or until they expire.

2.3.2 We use cookies for the following reasons:

- We use our session-based and also permanent functional cookies which enable the website to remember your actions and preferences (e.g., to remember that you are logged in) so you don't have to keep re-entering them whenever you come back to the website or browse from one page to another.
- We may use analytical cookies for the improvement of our Site and Platform. We may collect data such as device data, browsing data and interactions with the Site and Platform. You can withdraw to analytical

cookies at any time through your browser settings.

- We may use marketing cookies including social pixels, for retargeting you on other websites. You can withdraw your consent to marketing cookies at any time through your browser settings.
- Our Services and the communications generated from using our Services, such as promotional emails, may contain electronic images known as “web beacons”. Web beacons generally work in conjunction with cookies, and we may use them in the same way we use cookies.

2.3.3 How to control cookies?

- We inform you about the use of cookies on your device when you visit our website for the first time and, if applicable, we ask for your consent to use the cookies. The cookies will not be used for any purposes other than the ones stated above. Later, you may choose to accept or refuse cookies by selecting the appropriate settings in your browser.
- As mentioned above, in some cases we also may use cookies provided by third-parties (service providers). The list of such third-parties cookies of which you might encounter through our service is listed below. We are not responsible for third-party sites and their privacy practices. These companies collect and use this information under their own privacy policies and are responsible for their practices concerning cookies.

3 What are the purposes and legal basis for processing your personal data?

3.1 We process your personal data in order to:

3.1.1 carry out the agreement existing between us based on your decision to use our Service

This purpose includes mainly the following processing activities:

- creating and providing your account from personal data you provide upon registration;
- informing you about updates and new features of our Service;
- notifying you about updates of our Terms & Conditions and this Privacy Policy;
- responding to you in relation to any queries you may have with respect to our Services;
- resolving potential agreement-related troubleshoot problems and disputes.

We process the email address, payment information and other data provided by you voluntarily when you use our Service.

Legal basis for such processing: *the performance of a contract* in accordance with Article 6 (1) (b) of GDPR.

3.1.2 **market our Services**

We may market current or future Services to You if you subscribe to our newsletter or consent to marketing cookies, as described above.

The Controller processes your email address on the following legal basis: *your consent* in accordance with Article 6 (1) (a) of GDPR (granted during submitting your email address to our newsletter bar) or legitimate interest in accordance with Article 6(1) (f) of GDPR (if you have an existing relationship with Us) .

You can stop direct marketing communications from us by:

- clicking the “Unsubscribe from newsletter” link in any email communication that we send you. We will then stop any further newsletter emails; or
- withdrawing your consent through **contacting us**.

3.1.3 **improve our Services**

This purpose includes the following processing activities using technical information:

- to influence current and future features;
- to prevent and detect security flaws and user interface issues.
- We will use Hiring Data to enhance the overall experience and improve the models that power our Services but will not share or display your Hiring Data with any other user. Additionally, we do not use your Hiring Data to create, add, or modify profiles in a manner visible to other companies. If you request the deletion of your data, we will cease using it to refine our algorithms; however, any improvements already made to our general algorithms based on that data will remain. We have no plans to change this policy, but if changes occur in the future, we will communicate them clearly and transparently.

The Controller processes technical information under the following legal basis: legitimate interest in accordance with Article 6(1)(f) of GDPR.

We currently do not use any information collected through out Services for the purpose of profiling.

4 **Who are recipients of your personal data?**

4.1 We only share your personal data within the organisation of the Controller and the group of companies into which the Controller belongs.

4.2 We do not share your personal data with any recipients outside of the Controller and the group of companies into which the Controller belongs unless one of the following circumstances applies:PP

4.2.1 **it is necessary for the performance and improvement of our Services.**

To the extent that our external service providers (sub-processors) need access to your personal data to help us perform our Services for you, we have taken the appropriate contractual and organisational measures to ensure that your personal data are processed in accordance with all applicable laws and regulations.

When indicated, providers will only receive your technical data upon your consent.

Below is a non-exclusive list of our sub-processors:

- Google Analytics (Google LLC., United States)
- Google AdSense (Google LLC., United States)
- Stripe (Stripe Inc., United States)
- Mailchimp (The Rocket Science Group LLC., United States)

The list of external service providers we use may change from time to time as we change or remove some of the providers listed above and/or put in place other providers to assist us in providing the Services. All subprocessors are required to enter into data processing agreements with us. These agreements stipulate that the subprocessors must adhere to strict data protection and confidentiality obligations in line with relevant data protection laws. **It is necessary for legal reasons**

We may share your personal data with recipients outside the Controller if we have a good-faith belief that access to and use of your personal data is reasonably necessary to: (i) meet any applicable law, regulation, and/or court order; (ii) detect, prevent, or otherwise address fraud, security or technical issues; and/or (iii) protect the interests, properties or safety of the Controller, our users or the public as far as in accordance with the law. When possible, we will inform you about such processing.

5 International transferees outside the EU/EEA?

5.1 We ensure that any international transfer of your personal data is protected by appropriate safeguards, such as:

5.1.1 **Standard Contractual Clauses (SCCs):** We use standard contractual clauses approved by the European Commission as a legal mechanism for transferring data outside the EEA.

5.1.2 **Binding Corporate Rules (BCR):** In cases where data is transferred within a corporate group, we may rely on Binding Corporate Rules (BCR) approved by European data protection authorities.

5.2 If we are involved in a merger, acquisition or other reorganisation, your information may be transferred as part of that deal. We will notify you (for example, via a message to the email address associated with your account) of any such deal and outline your choices in that event.

6 **What is the storage period?**

- 6.1 We store your personal data for as long as necessary to fulfill the purposes for which it was collected. This includes complying with legal, accounting, or reporting obligations. The specific retention periods depend on the type of data and the purposes for which we process it.

7 **What are your rights?**

- 7.1 **Right of access** - The Controller offers you access to your personal data we process. This means you can contact us and request from us a confirmation whether or not your personal data are being processed and if so, you have the right to request access to your data, which we will provide to you in the form of a so-called "registry" (stating, in particular, purposes, categories of personal data, categories of recipients of personal data, storage periods or criteria for determining storage periods).
- 7.2 **Right to rectification** - You have the right to have inaccurate personal data we have stored about you rectified.
- 7.3 **Right to erasure** - You may also ask us to erase your personal data from our systems. We will comply with such requests unless we have a legitimate ground to not delete your personal data.
- 7.4 **Right to restriction of processing** - You may request us to restrict certain processing of your personal data. If you restrict certain processing of your personal data, this may lead to fewer possibilities to use our Services and website.
- 7.5 **Right to data portability** - You have the right to receive your personal data from us in a structured, commonly used and machine-readable format in order to transmit the personal data to another controller.
- 7.6 **How to use your rights** - You may exercise your rights above, free of charge, by contacting us. We may require confirmation of your identity depending on your request.

8 **May you complain?**

- 8.1 In case you consider our processing activities of your personal data to be inconsistent with the applicable data protection laws, you may lodge a complaint with the local supervisory authority for data protection.

9 **How is your data secured?**

- 9.1 We take all reasonable, appropriate security measures to protect the Controller and our customers from unauthorised access to or unauthorised alteration, disclosure or destruction of personal data we hold. Measures include, where appropriate, encryption, firewalls, secure facilities, access rights systems, and following privacy-by-design practices such as data minimization and anonymization. Should despite the security measures, a security breach occur that is likely to have negative effects to your privacy, we will inform you about the breach as soon as reasonably possible. If you have any questions, feel free to contact us.

10 Notice for US-based Customers

- 10.1 If you are a resident of California, under the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws this Section applies to your use of the Services.
- 10.2 For purposes of this Section 12, the terms “Business,” “Business Purpose,” “Commercial Purpose,” “Consumer,” “Personal Information,” “Processing,” “Sell,” “Service Provider,” “Share,” and “Verifiable Consumer Request” shall have the meanings outlined in the CCPA. All references to “Personal Data,” “Controller,” “Processor,” and “Data Subject” in this Section shall be deemed to be references to “Personal Information,” “Business,” “Service Provider,” and “Consumer,” respectively, as defined in the CCPA.
- 10.3 The Parties Agree agree that Company is a Service Provider for the purposes of the CCPA (to the extent it applies) and Company is receiving Personal Information from you in order to provide the Services pursuant to the Agreement, which constitutes a Business Purpose.
- 10.4 You shall disclose Personal Information to Company only for the limited and specified purposes described in Section 7. of this Policy.
- 10.5 Company shall not Sell or Share Personal Information provided by you under the Agreement.
- 10.6 Company shall notify you if it makes a determination that it can no longer meet its obligations under the CCPA.
- 10.7 Company shall comply with all obligations applicable to Service Providers under the CCPA, including by providing Personal Information provided by Customer under the Agreement the level of privacy protection required by CCPA.
- 10.8 You have the rights in Section 10 of this Privacy Policy in addition not to be discriminated against for exercising these rights. You may exercise any of these rights by contacting us.

11 Contacting Us

- 11.1 If you have any questions or concerns about this Privacy Policy or our data protection practices, please contact us at:
 - Name: TalentSquare Data Privacy Team
 - Email: support@jobstalentsquare.com
 - Mailing Address: Lansing St SE 2143, Grand Rapids, Michigan, 49506, US