

## Privacy Policy: Last Updated 2/1/19R

Jobeo, Inc. (hereafter “Jobeo”) is committed to protecting the integrity and privacy of your personal information. This Privacy Notice explains how we collect personal information through our website at [www.jobeo.net](http://www.jobeo.net) and its sub-domains (“Website”) and our mobile application platform and related services (“Services”).

A user’s last name is not shared without mutual interest on the app to promote privacy within job search. Jobeo reserves the right to use job seeker and employer data and their video clips in marketing materials without notice. We do NOT distribute for free or sell user information and/or data, including video clips, to ANYONE. Using our app’s likeness and/or screenshots of our content is prohibited without express written consent from Jobeo, Inc.

If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Privacy Notice.

### **What does Jobeo do?**

Jobeo helps global enterprises, large and small, gain a competitive advantage in the modern talent marketplace with cloud based video recruiting and matching software. Jobeo also helps job seekers feel understood and appreciated at a level not seen before in the recruiting industry. Our customers, whether employers or job seekers, can use our software to find a better employment match faster than before and with a higher rate of retention and success.

We are headquartered in the USA, but work with affiliates, service providers and customers all around the globe. For more information about Jobeo, please see the “About Us” section of our Website at <https://www.jobeo.net> and to see specific product information please see our “Employers” or “Job Seekers” tabs of our Website at <https://www.jobeo.net>

### **What personal information does Jobeo collect through the Website and/or Services?**

The personal information that we may collect about you through the Website and Services broadly falls into the following categories:

#### *Information that you provide voluntarily*

Certain parts of our Website and/or Services may ask you to provide personal information voluntarily: for example, we may ask you to provide your contact details in order to request a demo, register an account with us, to subscribe to marketing communications from us, and/or to submit enquiries to us. The personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal information. Typically, we will ask for your name and contact details, and some basic information about the company you work for, the products you are interested in, and your role in the company.

#### *Information that we collect automatically*

When you visit our Website and/or Services, we may collect certain information automatically from your device. In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws.

Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our Website, including the pages accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our Website, where they come from, and what content on our Website is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our Website to our visitors.

Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading “Cookies and similar tracking technology” below.

Information that we obtain from third party sources

From time to time, we may receive personal information about you from third party sources, but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

The types of information we collect from third parties include general geo location information to identify what state and country you are visiting our site from and we use the information we receive from these third parties to ensure inquiries and other requests are routed to the appropriate team for processing as promptly as possible.

#### **What information does Jobeo collect through the Services?**

If you are a job candidate (“Candidate”) or employee (“Employee”) using our Services on behalf of one of our customers who are engaging us to provide the Services to them (the “Potential Employers”), we are collecting and processing your personal information on behalf of the Potential Employers. In such cases, we are acting as a data processor and are collecting and processing your personal information on their behalf and in accordance with their instructions. The types of information typically collected are described in detail in this section below. What we do not collect, and you should not be asked by Potential Employers to provide to Jobeo, are things like protected health information, financial information, date of birth, social security or other government-issued identification number, and other sensitive personal information.

It is primarily the Potential Employer who must ensure that your personal information is collected and processed in accordance with data protection laws. Therefore, if you have questions or concerns about the handling of your personal data, you should contact the relevant Potential Employer directly or refer to their separate privacy policies.

The following outlines the types of personal information that we will typically collect through the Services on behalf of our customers:

##### *Information that you provide voluntarily*

In using the Services, Candidates and Employees may be required to provide certain personal information about themselves – for example, their name, contact details, username and password (username and password is for Employees only, as Candidates do not create accounts within the Jobeo platform), and other information as requested by the Employer. Candidates may complete a job interview through the Services which can include information such as work history, skills, experience, abilities, work style and other responses to questions, as well as submissions through a variety of types of media including video/audio interviews, coding challenges, training exercises and the like.

##### *Information that we collect automatically*

When you use the Services, we may collect certain information automatically from your device. In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws. Specifically, this information may include IP addresses, other unique device IDs or addresses, web browser and/or device type, the pages you view on the Services and the dates and times you visit, access or use the Service. Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading “Cookies and similar tracking technology” below. You can view our full cookie policy [here](#).

*Information that we obtain from third party sources:* From time to time, we may receive personal information about you from third party sources, but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

### **How does Jobeo use this information?**

Jobeo may use your personal information in a variety of ways for the operation of the Website and its Services, including:

To operate, maintain, enhance, and provide all of the features and services found on the Website and Services, to personalize the Website and Services for your preferences and interests.

To contact you for administrative purposes regarding the Services, for customer service purposes, or regarding content that you have posted to the Service.

To understand and analyze the usage trends, interests, and preferences of our users, to improve the way the Website and Services works and looks, and to create new features and functionality.

Jobeo may now or in the future use “automatically collected” information and “cookies” information to: (a) personalize our services, such as remembering your information so that you will not have to re-enter it during your visit or the next time you visit the Website or Services; (b) monitor and analyze the effectiveness of the application and evaluation activities; (c) monitor aggregate usage metrics such as total number of users, pages and media and features of the Website or Service accessed, etc.; and (d) track your entries, submissions, and status, including the ways in which you may interact with the Services.

Where it is in accordance with your preferences, to send emails related to the products and services we think you may be interested in. You will have the ability to opt-out of receiving any such communications, either through links provided in the messages, contacting us directly via email [sales@jobeo.net](mailto:sales@jobeo.net), or by updating your account preferences through the Services.

### **Who does Jobeo share my personal information with?**

We may disclose your personal information to the following categories of recipients: to the Employer or prospective employers, to job seekers, to our group companies, third party services providers and partners who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security and features of our Website and Services), or who otherwise process personal information for purposes that are described in this Privacy Notice or notified to you when we collect your personal information;

to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;

in connection with any proposed purchase, reorganization, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal

information only for the purposes disclosed in this Privacy Notice; to any other person with your consent to the disclosure.

As stated above, if you are a Candidate or Employee and we are collecting your personal information through the Services, we will be collecting it on behalf of our customers, in accordance with the agreements that we have with them. For further information about how your personal information is shared with third parties, you should contact the relevant Employer or refer to their separate privacy policy.

### **Legal basis for processing personal information of Website visitors (EEA visitors only)**

If you are a Website visitor from the European Economic Area, our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it. However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), which are not already referred to above, we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the “How to contact us” heading below.

### *Cookies and similar tracking technology*

We use cookies and similar tracking technology (collectively, “Cookies”) to collect and use personal information about you, including to help us understand how our Website and Services are being used or to personalize our Website and Services for you. For further information about the types of Cookies we use, why, and how you can control Cookies, please see our Cookie Notice.

### **How does Jobeo keep my personal information secure?**

We use appropriate technical and organizational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. However, please be aware that no physical or technical system is completely secure or immune from outages, losses, attacks, circumvention, design or implementation flaws, and human error. Therefore, we cannot and do not ensure or warrant that information you transmit to Jobeo will not be lost or compromised, either during or after transmission.

You are responsible for maintaining the secrecy of your unique password and account information at all times, to the extent your access includes an account and password (Candidates may not have an account and password when using the Services).

### *International data transfers*

Your personal information may be transferred to, and processed in, countries other

than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective).

Specifically, unless otherwise required by local law, our Website and Services are hosted in the USA and the EU. Also, your personal information may be transferred to and processed in other countries around the world where our group companies and third party service providers and partners operate including in the USA, the European Union/European Economic Area, and Australia. This means that when we collect your personal information we may process it in any of these locations.

However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Notice and applicable laws. If you are from the EEA, these include implementing the European Commission's Standard Contractual Clauses for transfers of personal information between our group companies, and with our third party service providers and partners. Alternatively, certain of our third party service providers and partners may rely on self-certification to the Privacy Shield Framework for transfers of personal information. The Standard Contractual Clauses and the Privacy Shield Framework require non-EEA companies to protect EEA personal information they process in accordance with European Union data protection law.

#### *Data retention*

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements). When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Where we are collecting personal information on behalf of our customers (the Employer), we will retain the personal information in accordance with our services agreements with them and their instructions.

#### *Your data protection rights*

Under applicable data protection laws, you have the following data protection rights in respect of your personal information collected through the Website:

If you wish to access, correct, update or request deletion of your personal information, you can do so at any time by contacting us using the contact details provided under the "How to contact us" heading below.

In addition, if you are a resident of the European Union, you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the "How to contact us" heading below.

You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the "How to contact us" heading below.

Similarly, if we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. (Contact details for data protection authorities in the European Economic Area, Switzerland and certain non-European countries (including the US and Canada) are available here.)

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. To protect your privacy and security, we take reasonable steps to verify your identity before granting you account access or making corrections to your information.

Please note that if you are a Candidate or Employee whose personal information has been collected through the Service and you would like to exercise your data protection rights in respect of your personal information, you should contact the Employer directly. We will provide assistance to the Employer to respond to your request, where required, in accordance with their instructions and the terms of our agreements with them.

#### *Third Party Services:*

The Website and Services may contain references and links to other websites and services provided by third parties, including Employers. Any personal information you provide on third party sites or services (including communications between Candidates or Employees and Employers through the Service) is provided directly to that third party and is subject to that third party's policies governing privacy and security. We are not responsible for the content or privacy and security practices and policies of third party sites or services to which links are displayed on the Service. We encourage you to learn about third parties' privacy and security policies before providing them with your personal information.

#### *Updates to this Privacy Notice*

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

You can see when this Privacy Notice was last updated by checking the "last updated" date displayed at the top of this Privacy Notice.

#### **How to contact us**

If you have any questions or concerns about our use of your personal information, please contact us using the following details: