

# PRIVACY POLICY

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**Effective May 25, 2018**

*Update notes:* This version of the Privacy Policy reflects changes in data protection law. In addition, we have made the Privacy Policy more understandable by organizing it into the sections listed in the Table of Contents and defining and capitalizing a few terms that are used throughout.

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## Introduction

This Privacy Policy describes how Recruitifi collects, uses, and discloses information, and what choices you have with respect to the information.

When we refer to “Recruitifi,” “we,” or “us,” we mean the entity that operates [www.Recruitifi.com](http://www.Recruitifi.com) (the “Service”) and acts as the controller of your information, as explained in more detail in the “Identifying the Data Controller and Processor” section below. Recruitifi has many different

parties that may use the service in different ways. We may specifically refer to “Employers,” “Recruiters,” “Candidates,” and “Website Visitors” as specific cases apply only to that party or their relevant business entities, but collectively, they may be referred to as “Users,” or “you.”

## Data Protection Officer

To communicate with our Data Protection Officer, please email [dpo@recruitifi.com](mailto:dpo@recruitifi.com).

## Identifying the Data Controller and Processor

Data protection law in certain jurisdictions differentiates between the “Controller” and “Processor” of information. In general, Recruitifi, a US company based in New York City, New York, is the Controller of Personal Data. Recruitifi relies on various vendors who act as Processors to handle different categories of data.

In general, requests to exercise any of your rights regarding Personal Data below should be directed to Recruitifi. Unless otherwise noted in this Privacy Policy, it is required by law, or you are otherwise notified by Recruitifi that additional steps must be taken, Recruitifi will act as Controller to handle Personal Data requests with our Processors.

## Your Rights Relating To Your Personal Data

Individuals in certain countries have certain statutory rights with regard to data that enables personal identification (“Personal Data”). In many cases, hiring data must be kept on file in accordance with various international regulations. Except where Recruitifi is legally obligated to retain certain data, you have the right under this Privacy Policy, and by law if you are within the EU, to:

- **Request access to your Personal Data.** If you are within the EU, this enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.
- **Request correction of the Personal Data that we hold about you.** This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure of your Personal Data.** This enables you to ask us to delete or remove

Personal Data where there is no good reason for us continuing to process it. You also have the right if you are within the EU to ask us to delete or remove your Personal Data where you have exercised your right to object to processing (see below).

- **Object to processing of your Personal Data.** This right exists where we are relying on a legitimate interest as the legal basis for our processing and there is something about your particular situation, which makes you want to object to processing of your Personal Data on this ground.
- **Request the restriction of processing of your Personal Data.** This enables you to ask us to suspend the processing of Personal Data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer of your Personal Data.** If you are within the EU, we will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format.
- **Withdraw consent.** This right only exists where we are relying on consent to process your Personal Data ("Consent Withdrawal"). If you withdraw your consent, we may not be able to provide you with access to the certain specific functionalities of our platform. We will advise you if this is the case at the time you withdraw your consent.

## How to Exercise Your Rights

If you want to exercise any of the rights described above or lodge a complaint in regards to this privacy policy, please use [this form](#) or email our Data Protection Officer directly at: [dpo@recruitifi.com](mailto:dpo@recruitifi.com).

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Please note that if you are in the EU, the GDPR gives you the right to contact your local data protection supervisory authority if you feel that any complaints have not been adequately resolved.

# Personal Data We Collect

RecrutiFi uses Personal Data we collect to provide our service, personalize content, remember information to help you efficiently access your account, make or receive payment for services obtained through the RecrutiFi platform, information to help us fill out tax forms, analyze how our services are used, diagnose service or technical problems, maintain security, monitor aggregate metrics such as total number of visitors, traffic, and demographic patterns, and track User content and Users as necessary to comply with the OFCCP and EEOC regulations in addition to other applicable laws.

You do not have a legal obligation to provide us with any information, but you may have a contractual obligation to do so, and if we do not receive certain information from you, then we will not be able to provide our Service to you. If you have any questions regarding whether provision of information is mandatory and the consequences for withholding such information, please contact our Data Protection Officer.

This Personal Data and other information may be collected in a variety of manners, as listed below.

## Information You Provide to Us

There are many occasions when you provide information directly to us as part of our services. The following types of information may be provided by you.

- **Contact Information:** In the course of using the Service, we may require or otherwise collect information that identifies you as a specific individual and can be used to contact or identify you. Examples include your name, email address, company address, phone number, a photo, or links to online profiles. Some of this information may be made viewable by other RecrutiFi users.
- **Payment Information:** If you use the Service to make or receive payments, we will also collect certain payment information, such as credit card, bank, or other financial account information, and billing address.
- **Identity Verification:** We may collect identity information, such as your date of birth, social security number, or taxpayer identification number to validate your identity for payments or as may be required by law, such as to complete tax filings. We may request documents to verify this information, such as a copy of your government-issued identification, a photo, or a billing statement.
- **Non-Identifying Information:** We also may collect other information, such as zip codes,

demographic data, information regarding your use of the Service, and general JobCast-related data (“Non-Identifying Information”). We may aggregate Non-Identifying Information collected from Recruitifi Users.

- **Content Data:** Any content you post to the Services not already included in another category, including without limitation, your profiles, questions, answers, messages, comments, ratings, feedback, and other contributions on the Services, and metadata about them (such as when you posted them) (“Content”).
- **Marketing and Communications Data:** Your preferences in receiving marketing from us and our third parties and your communication preferences. If you correspond with us by email or messaging through the Services, we may retain the content of such messages and our responses.
- **Special Categories of Personal Data:** You may be asked to optionally provide certain categories of data that would be considered special under statutes like the GDPR in the EU. This information may be collected by us and shared with Employers where it is legally required for us to give you the option of providing these Special Categories of Personal Data. These include your racial and ethnic background, as well as disability or veteran status, and any other information that may be required by local hiring regulations such as those dictated by the EEOC and OFCCP.
- **Hashed Information:** In some cases, we may render Personal Data into a form of Non-Identifying Information referred to in this Privacy Policy as “Hashed Information.” This is typically accomplished using a mathematical process (commonly known as a hash function) to convert information into a code. The code does not identify you directly, but it may be used to connect your activity and interests.

### **Information Received From Third Parties**

As Recruitifi engages in the submission of Candidates to Employers by Recruiters, there are some elements of Personal Data that are presented to Recruitifi and other Users by third parties as a designed part of the Service. We may also integrate with or receive information from third party services that may constitute Personal Data.

- **Professional Information:** Your name, email, phone number, professional history, resume/CV, work references, and other professional information (typically if you are a Candidate) may be provided to Recruitifi by a third-party (typically a Recruiter). Using the contact information available, you will be notified that this information has been provided to Recruitifi, and who it has been provided by. Your professional information can be

updated by you, deleted where legally allowed, and will not be shared without your consent.

- **Miscellaneous Third Party Info:** We also may receive information about you from third parties should you choose to sign in with a third-party service or link to an outside service. If we combine the information we receive from third parties with information we collect through the Service, we will treat the combined information as described in this Privacy Policy.

### **Information Collected Automatically**

Like other online companies, we receive technical information when you use our Services. We use these technologies to analyze how people use our Services, to improve how our platform functions, to save your log-in information for future sessions, and to serve you with advertisements that may interest you.

- **Browsing Information:** We and our third party service providers, including analytics and third party content providers, may automatically collect certain information from you whenever you access or interact with the Service. This information may include, among other information, the browser and operating system you are using, the URL or advertisement that referred you to the Service, the search terms you entered into a search engine that led you to the Service, areas within the Service that you visited, and other information commonly shared when browsers communicate with websites. We may combine this automatically collected log information with other information we collect about you. We do this to improve services we offer you, to improve marketing, analytics, and site functionality.
- **Device Identifiers:** The information we collect also includes the Internet Protocol (“IP”) address or other unique device identifier (“Device Identifier”) for any device (computer, mobile phone, tablet, etc.) used to access the Service. A Device Identifier is a number that is automatically assigned or connected to the device you use to access the Service, and our servers identify your device by its Device Identifier. Some mobile service providers may also provide us or our third party service providers with information regarding the physical location of the device used to access the Service.
- **Cookies:** Covered in more depth below in the “Cookies and Controlling Their Use” section.

## Aggregated Data

We may also collect, use, and share "Aggregated Data" such as statistical or demographic data for any purpose. Aggregated Data may be derived from your Personal Data, but once in aggregated form it will not constitute Personal Data for the purposes of the GDPR as this data does not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this Privacy & Cookies Policy.

## Cookies and Controlling Their Use

RecrutiFi and its partners use cookies or similar technologies to analyze trends, administer the website, track users' movement around the website, and to gather demographic information about our user base as a whole. The technology used to collect information automatically from RecrutiFi Users may include the following:

- **Cookies:** Like many websites, we and our marketing partners, affiliates, analytics, and service providers use "cookies" to collect information. A cookie is a small data file that we transfer to your computer's hard disk for record-keeping purposes. We use both persistent cookies that remain on your computer or similar device (such as to save your registration ID and login password for future logins to the Service and to track your compliance with the RecrutiFi Terms) and session ID cookies, which expire at the end of your browser session (for example, to enable certain features of the Service, to better understand how RecrutiFi Users interact with the Service and to monitor aggregate usage by RecrutiFi Users and web traffic routing on the Service). You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functionality of the Service.
- **Web Beacons:** We and our marketing partners, affiliates, analytics, and service providers may also employ software technology known as "web beacons" and/or "tracking tags" to help us keep track of what content on our Service is effective and to serve relevant advertising to you. Web beacons are small graphics with a unique identifier that may be invisible to you, and which are used to track the online activity of Internet users. Web beacons are embedded in the web pages you review or email messages you receive. Web beacons or similar technologies may be used for a number of purposes, including, without limitation, to count visitors to our Service, to monitor how RecrutiFi Users

navigate the Service, to count how many emails that were sent were actually opened, or to count how many particular articles or links were actually viewed.

- **Embedded Scripts:** We and our marketing partners, affiliates, analytics, and service providers may also employ software technology known as an Embedded Script. An Embedded Script is programming code that is designed to collect information about your interactions with the Service, such as the links you click on. The code is temporarily downloaded onto your computer or other device and is deactivated or deleted when you disconnect from the Service.

In addition, we and our marketing partners, affiliates, analytics, and service providers may use a variety of other technologies (such as tags) that collect similar information for security and fraud detection purposes and we may use third parties to perform these services on our behalf.

### **Change Your Cookie Preferences**

In order to change your cookie preferences, you can fill out the [this form](#).

Please note that some cookies are essential to certain parts of the Service, and blocking them may restrict your ability to have a functioning account. For example, you may not be able to log into private areas of the site and access your account.

### **Third-Party Analytics**

RecrutiFi may use third-party services such as Google Analytics to help understand use of the Service. These services typically collect the information sent by your browser as part of a web page request, including cookies, and your IP address. They receive this information and their use of it is governed by their respective privacy policies.

### **Change Your Browser's Cookie Settings**

Most web browsers allow some control of most cookies through the browser settings. Many of the cookies set by RecrutiFi can be deleted or blocked through your web browser, but it should be noted that the Services may not be able to function properly without some of them. To find information relating to other browsers, visit the browser developer's website.

# How We Use Your Personal Data

RecrutiFi uses Personal Data to deliver and improve our Services; to manage your account and provide you with customer support; to analyze Users' use of the Services; to develop, display, and track Content and advertising tailored to your interests on the Services and other sites, including, potentially, providing our advertisements to you when you visit other sites; website or mobile application analytics; to diagnose or fix technology problems; to automatically update the Services on your device; to verify your identity and prevent fraud or other unauthorized or illegal activity; to enforce or exercise any rights in our Terms.

In respect of each of the purposes for which we use your Personal Data, the GDPR requires us to ensure that we have a legal basis for that use if you are within the EU. The legal bases depend on the Services you use and how you use them. This means we collect and use your Personal Data only where:

- You have consented for us to do so for a specific purpose;
- We need it to provide you the Services, including to operate the Services, provide customer support and personalized features, and to protect the safety and security of the Services;
- It satisfies a legitimate interest (which is not overridden by your data protection interests);  
or
- We need to process your data to comply with a legal or regulatory obligation.

We may also rely on your consent as a legal basis for using your Personal Data where we have expressly sought it for a specific purpose. You do have the right to revoke consent at any time, however, this will not affect any processing that has already taken place, and depending on the situation, we may be required to retain data already processed in accordance with local laws. We have set out below, in a table format, more detailed examples of relevant purposes for which we may use your Personal Data.

## Information Sharing and Disclosure

We may share information about you to provide the Services, for legal and investigative purposes, or if we are part of a merger or acquisition. We may also share non-identifying information with third parties. You have choices as to whether we share your personal information with third parties for their own marketing purposes.

We may share aggregated Non-Identifying Information and we may otherwise disclose Non-Identifying Information (including Hashed Information) to third parties. We may also share the information we have collected about you, including Personal Information, as disclosed at the time you provide your information, with your consent, as otherwise described in this Privacy Policy, or in the following circumstances:

- **Information Shared With Other Users:** Recruiters, Employers, and Candidates may have some of their Personal Data and any User Content shared with other Users for the purposes of providing the Services. This may include Contact Information, Content Data, Special Categories of Personal Data, and Professional Information as covered in the section above, “Personal Data We Collect.”
- **Service Providers:** We may employ third party companies and individuals to facilitate our Service, to provide the Service on our behalf, to perform Service-related services (e.g., without limitation, maintenance services, database management, web analytics and online advertising, payment processing, fraud detection and improvement of RecrutiFi features) or to assist us in analyzing how our Service is used. These third parties may have access to your Personal Information in order to perform these tasks on our behalf.
- **Legal and Investigative Purposes:** RecrutiFi will share information with government agencies as required by law in response to lawful requests by public authorities, including to meet national security or law enforcement requirements and, including without limitation, in connection with reporting earnings. We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (including but not limited to subpoenas), or, at the request of governmental authorities or other third parties conducting an investigation where we determine in our sole discretion the disclosure is necessary to (a) protect the property and rights of RecrutiFi or a third party, (b) protect the safety of the public or any person, or (c) prevent or stop activity we may consider to be, or pose a risk of being, illegal, fraudulent, unethical or legally actionable activity. We may also use Device Identifiers to identify RecrutiFi Users, and may do so in cooperation with third parties at our discretion.
- **Business Transfers:** We may sell, transfer, or otherwise share some or all of our assets, including your Personal Information, in connection with a merger, acquisition, reorganization or sale of assets (including, in each case, as part of the due-diligence process with any potential acquiring entity) or in the event of bankruptcy.

# International Data Transfers

RecrutiFi is a U.S. company. If you are located outside the United States and choose to provide information to us, RecrutiFi transfers Personal Information to the United States for processing, and our service providers may process Personal Information in the United States and elsewhere. These countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your information to the United States, we will protect it as described in this Privacy Policy.

If we transfer Personal Data originating from the European Union or Switzerland to other countries not deemed adequate under applicable data protection law:

- **E.U.-U.S. Privacy Shield and Swiss-U.S. Privacy Shield:** To comply with European Union and Swiss data protection laws, RecrutiFi has entered into data processing agreements with our service providers whenever feasible and appropriate. RecrutiFi's main Processors, Amazon Web Services, Heroku, and Stripe, are all certified under the E.U.-U.S. Privacy Shield and the Swiss-U.S. Privacy Shield. These frameworks were developed to enable companies to comply with data protection requirements when transferring personal data from the European Union and Switzerland to the United States. To request more information about RecrutiFi's vendors, contact our Data Protection Officer.
- **European Union Model Clauses:** RecrutiFi has signed European Union Model Clauses, also known as Standard Contractual Clauses, with our service providers whenever feasible to meet the adequacy and security requirements for our Users in the European Union.

## Data Security

We take a number of steps to protect your data, but no security is guaranteed.

RecrutiFi takes commercially reasonable steps to help protect and secure the information it collects and stores about RecrutiFi Users. All access to the Site is encrypted using industry-standard transport layer security technology ("TLS"). When you enter sensitive information (such as tax identification number), we encrypt the transmission of that information using secure socket layer technology ("SSL"). RecrutiFi's payment Processors are certified to PCI Service Provider Level 1. We also use HTTP strict transport security to add an additional layer of

protection for our Recruitifi Users. But remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. Thus, while we strive to protect your Personal Information, Recruitifi cannot ensure and does not warrant the security of any information you transmit to us.

## Policy on Children's Privacy

Protecting the privacy of children is especially important. The Service is general audience and intended for users 18 and older. We do not knowingly collect Personal Information from anyone younger than age 18. If we become aware that a child younger than 18 has provided us with Personal Information, we will use commercially reasonable efforts to delete such information from our files. If you are the parent or legal guardian of a child younger than age 18 and believe that Recruitifi has collected Personal Information from your child, please contact our Data Protection Officer at: [dpo@Recruitifi.com](mailto:dpo@Recruitifi.com).

## Links to Third-Party Websites

This Privacy & Cookies Policy applies only to Recruitifi and our Services. Our Service contains links to other websites. If you choose to click on a third party link, you will be directed to that third party's website. The fact that we link to a website is not an endorsement, authorization or representation of our affiliation with that third party, nor is it an endorsement of their privacy or information security policies or practices. We do not exercise control over third party websites. These other websites may place their own cookies or other files on your computer, collect data or solicit Personal Information from you. We encourage you to read the privacy policies or statements of the other websites you visit.

## Updates to Our Privacy Policy

We reserve the right, in our sole discretion, to change, modify, add, or remove portions of this Privacy Policy at any time. Any changes or updates will be effective immediately upon posting to this page. You should review this Privacy Policy regularly for changes. You can determine if changes have been made by checking the Effective Date above. Your continued use of Recruitifi

and our Services following the posting of any changes to this Privacy Policy means you consent to such changes.