Your Privacy Rights - VettedIT Privacy Policy

VettedIT Privacy Policy last updated and posted on February 1, 2020.

VettedIT is committed to protecting the privacy of our users and strives to provide a safe user experience. This privacy policy describes how your personal information is collected, used, shared, and secured, as well as your choices regarding use, access, and correction of your personal information.

By using this site or application, you agree to the collection, use and transfer of your data as described in this Privacy Policy.

You may revoke your consent to this policy or exercise your privacy rights. To do so, please contact us. If you revoke your consent, your account and profile information will be removed from our website.

Information collected on our sites and applications is stored in the United States; therefore, your information may become subject to U.S. law.

#### Scope of this Privacy Policy

This privacy policy applies to information we collect or use on sites and applications owned or controlled by VettedIT LLC or its affiliated companies ("VettedIT"). Affiliated companies are entities that control, are controlled by or are under common control with VettedIT LLC.

## Information We Collect

We collect information about you when you use our sites and applications. We receive and store this information when you enter it on our website, send it to us, or provide it to us in any other way.

We collect information when you choose to give it to us. This includes:

- Contact information like name, email address, street address, and phone number
- Your resume including job experience
- The information you use to apply to jobs on VettedIT
- Information imported by you from third party applications;
- Information you provide to us when you contact VettedIT
- Credit card number and billing information (for services requiring payment);
- Your race, ethnicity, or gender, if you choose to provide it. Some employers are required by law to collect this information on a voluntary basis;
- Information about your business, such as company name, size, and business type.

You can correct or remove this information by accessing your account settings. We also collect information from you in the following ways:

Single Sign-on: If you choose to sign in to VettedIT with Facebook or similar services, we import the requested information from your account and we make it part of your profile.

Referrals: We may collect from you personal information about others. For instance, if you choose to use our service to share site content with a friend, we will ask you for your friend's name and email address. We will automatically send your friend a one-time email inviting him or her to visit the site. We temporarily store this information for the sole purpose of sending this one-time email.

# Information automatically collected about you when you use VettedIT

We gather certain information automatically when you visit our site or use our mobile applications. This information includes:

- Your activity on VettedIT, including the jobs you search for, view, and apply to
- Your internet protocol (IP) address and internet service provider (ISP)
- Your browser type and device ID
- the files viewed on our site (e.g., HTML pages, graphics, etc.)
- operating system, date/time stamp, and/or clickstream data

This data is collected about you automatically and is processed for VettedIT's legitimate interest. We combine this information with personal data to help detect and prevent fraud. We also combine this data with your profile and resume data to return the best job search results to you.

## Information collected about you from third parties

If you are located in the United States, we may collect information about you from publicly-available websites. We may use this information to create a profile, even if you do not have an account with us, or append the information to an existing profile that you have with us. You will have the opportunity to claim collected information relating to you and to remove the information as described in this privacy policy. However we cannot guarantee that we will not later collect from publicly-available websites other information that pertains to you.

## How We Use Information

We use the information we collect to provide our services, respond to you, operate and improve our sites and applications, and foster a positive user experience. We use information with your consent as described at the time we collect that consent. This includes account creation and resume upload.

We use personal data for our legitimate interests, namely:

- to operate VettedIT services;
- to contact and communicate with you when you contact us;
- to analyze, improve and optimize VettedIT services; and
- to protect VettedIT Services and the rights of users and others
- to enforce terms of VettedIT's services and prevent fraud and abuse of VettedIT systems

By registering with VettedIT, by managing your profile, by publicly posting information, or by opting in when presented with choices, you have consented for us to use your information in the following ways:

To provide you with our services, which includes

- to create a VettedIT account for you, including any resume you create or upload
- to enable you to search for jobs and share them with others
- to enable you to apply for jobs
- if you are in the US, to add information gathered from public websites to your profile;
- to help potential employers find your resume and contact you;
- to make purchases;
- to enable you to contact us and for us to respond to you;
- to display targeted recruitment messages from employers;
- to contact you with service-related communications and security updates
- to provide information about you and your interest in job postings to employers;
- to provide products and services to employer customers to complete the recruitment and hiring process;

For marketing

- to provide personalized, targeted, or location-based content, services, and advertising from us and third parties;
- to send you job alerts, newsletters, career advice, or other marketing communications you have opted in to receive;
- to inform you of other products or services available from VettedIT or its affiliates;
- to conduct surveys, promotions and contests, and to publish the results thereof;

To improve our services

• to give search engines access to public information;

- to conduct analytics and generate internal reports about the use of our sites and applications;
- to track which jobs you search for, view, and apply to

For security and fraud prevention

- to detect, investigate and prevent activities that may violate our policies or be illegal; and
- to make suggestions and draw inferences about you. For example, we may make suggestions about people you may know or additional jobs, products or services that might be of interest to you. Or, if you identify yourself as "Mrs." we will assume you are female.

Some of our products and services, such as our resume and profile database and social media search, enable third parties to see your personal information and to contact you.

Information you post in public areas of VettedIT sites or applications or make visible in the resume and profile database may be accessed, used, and stored by others around the world, including those in countries that might not have legislation that guarantees adequate protection of personal information as defined by your country of residence. While VettedIT takes measures to safeguard your information from unauthorized access or inappropriate use, VettedIT does not control these third parties and we are not responsible for their use of information you give to us. Accordingly, you should not post sensitive information or any other information you would not want made public, to any VettedIT site or application or to a public website.

Our services include the display of personalized products, content, and advertising relating to your career experience and interests. We use data we have about you to determine whether you might be interested in the opportunities, products or services of a particular third party. We show you targeted ads online. These ads are targeted based on information we collect about you and information about you we acquire from third parties including public websites and data providers. Please see your account notification settings to customize the notification you receive and the About Our Ads page in our Privacy Center to learn more about targeted ads.

## How We Share Information

We provide you with a platform to broadcast information about yourself to maximize your career opportunities. The information we gather may be shared with the following categories of third parties:

- The VettedIT group of companies on a worldwide basis;
- Employers, when you make your resume searchable or apply to a job;
- Other companies hired to provide services on VettedIT's behalf;
- Other third parties where required by law;

• Other third parties when you give your consent to such sharing such as for resume writing services;

By applying to a job, providing your contact information to show interest in a job, or by replying to a message from an employer, you consent to the disclosure of your information to that employer and to be contacted by such employer for employment related purposes.

We do not share contact information with third parties for their direct marketing purposes unless you affirmatively agree to such disclosure. We also share information in the following ways

1. We share your information with our service providers, which are third parties who help deliver our products and services to you. Examples of these services include hosting our web servers and site databases, analyzing data, providing marketing assistance, providing customer management tools, processing credit card payments, and providing customer service. These companies will have access to your personal information as necessary to perform their functions, but they may not use that data for any other purpose. We will remain responsible for any information shared in this way.

2. We disclose information to third parties when you give your consent for us to do so. For example:

(a) if you make your resume searchable or if we collect information you've made available on a public website then all parties with access to our resume or profile database products will have access to your information;

(b) if you opt in to receive information about the products or services of third parties, we supply your contact information to those third parties so they may contact you.

We also share aggregated information (including location data) about VettedIT site visitors and application users with third parties to serve advertisements to you online. We also aggregate data regarding job qualifications, schooling, age, experience level or other information relevant to the job search. This aggregated data does not identify users individually, and may be made available to employers or shared publicly. If we create a co-branded site with another company, information collected on that site will be retained by both companies and subject to the privacy policies of both companies which will be published on the co-branded sites.

3. We may disclose to third parties information that we have collected from other websites.

4. We disclose information if legally required to do so, or at our discretion pursuant to a request from a governmental entity or if we believe in good faith - after considering your privacy interests and other factors - that such action is necessary to: (a) meet legal requirements or comply with legal process; (b) protect our rights or property or our affiliated companies; (c) investigate fraud, prevent a crime or protect national security; or (d) protect the personal safety of users or the public.

5. We may disclose and transfer personal information to a third party who acquires any or all of VettedIT's business units, whether such acquisition is by way of merger, consolidation or purchase of all or a substantial portion of our assets. In addition, in the event VettedIT becomes the subject of an insolvency proceeding, such information will be disposed of in a transaction approved by the court. You will be notified of the sale of all or a substantial portion of our business to a third party by email or through a prominent notice posted on the site.

# Cookies and Online Advertising

Cookies: VettedIT and its partners use cookies on the VettedIT sites to analyze trends, administer websites, track users' movements around the website, and to gather demographic information about our user base as a whole. Cookies help personalize and maximize your use of our site, including storing user preferences, improving search results and ad selection, and tracking user trends. You can control your cookies at the browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our website or service.

We use the following types of cookies:

- Security: These cookies allow us to secure access to your account.
- Preference: These cookies are used to store your preferences like language choice and display of job search results.
- Analytics: We track traffic patterns so we can identify popular content and potential problems.
- Features: We track which jobs you search for, view, and apply to so we can show you more jobs like those. We also use cookies to split some users into test groups to test new features.
- Advertising: We use non-identifiable information about you to show you advertising on VettedIT and third-party sites.

Some cookies will remain on your computer after you have left our site. Security cookies will remain for 60 days after your last visit. Poll response cookies will remain for 90 days, and VettedIT cookies relating to advertisements and site notices will remain for up to two years, unless you choose to delete them.

We also allow other companies to display advertisements to you while you are using our sites and applications. When this happens, these companies can view, edit or set their own cookies, just as if you had requested a web page from their site. The cookies placed by these third parties could remain on your computer after you have left our site for up to 20 years unless you choose to delete them. VettedIT also uses web beacons (sometimes called pixels) and JavaScript. We may receive a confirmation when you open an email from VettedIT if your computer supports this type of program.

VettedIT also uses "Flash cookies", also known as "Local Shared Objects", to preserve video player settings and for security purposes. You can <u>adjust your settings for your Flash cookies</u>.

Advertising Opt Out: VettedIT uses <u>Adobe</u> to help provide analytics and to serve advertisements. You can opt out of third party cookies by setting your browser to decline cookies. Otherwise, if you do not wish to allow your use of our sites to be aggregated and analyzed by Adobe Analytics, or used by Adobe to tailor dynamic content to your specific interests, you may opt out from Adobe at <u>https://www.adobe.com/privacy.html</u>.

If you delete your cookies, your opt-out cookie will also be deleted. If you change computers or web browsers, you will need to opt out again.

#### Social Media Widgets

Our site includes social media features, such as the Facebook Like button and widgets such as the Share This button. Your interactions with these features are governed by the privacy policy of the company providing it.

## An Important Note About Your Resume

When you create or post a resume, we store it in our resume and profile database in the United States. You may control the status of your resume by setting it to visible or private. Visible resumes can be viewed by anyone with access to our resume and profile database. We cannot control the retention, use or privacy of resumes that have been viewed or downloaded by others.

Private resumes will not be visible in our resume and profile database, but information we acquire about you from a public website may be visible. You may still use your private resume to apply online to a job. If you apply with a private resume, it will be transferred to the relevant employer, who may retain a copy of it.

We attempt to limit access to our resume and profile database to legitimate users, but cannot guarantee that other parties will not gain access to this database. Once your resume has been disclosed, VettedIT is not able to retrieve it from the third parties who accessed it. Accordingly, you should not put sensitive information, personality profiles, or other information you would not want made public, in your resume or profile.

If your resume includes personal data of a reference, it is your responsibility to ensure that the person is aware that you have forwarded his/her details and has consented in writing for you to do so.

Resumes you give to us must not contain sensitive data relating to your (i) racial or ethnic origin (ii) political beliefs (iii) philosophical or religious beliefs (iv) membership of a trade union or political party (v) physical or mental health or biometric details or genetic makeup (vi) addictions or sexual life (vii) the commission of criminal offences or proceedings and associated penalties or fines, (viii) the commission of any unlawful or objectionable conduct and associated penalties, or (ix) any Social Security Number or national identification number. If you do give us this information, then you agree that it is at your own risk.

## Access to and Storage of Your Personal Information

Access to your Personal Data: You may access, update, or delete your resume or profile at any time. To do so, sign in to your account, go to your resume or profile, and make the desired changes. If you do not have an account, or if you believe that someone else has provided us with your contact information, please contact us. You also have the rights to data portability and to request that VettedIT restrict processing data about you.

You have the right to know whether VettedIT has collected personal information from you. You may submit up to two access requests within a 12-month period asking VettedIT to tell you:

- the categories or specific pieces of personal information that VettedIT has collected from you;
- the categories of sources from which VettedIT has collected your information;
- the reasons why VettedIT collects personal information; and
- the categories of third parties with which VettedIT shares personal information.

You have the right to request that VettedIT delete any of your personal information that it has collected from you, with certain exceptions. We may refuse your deletion request if permitted by law. If we deny your deletion request, we will tell you why the request was denied. Additionally, if we determine that no exception to deletion applies, we will direct any of our service providers that have received your personal data to delete your personal information from their records as well.

To make a request, please contact us using the contact information below. VettedIT will verify your identity prior to granting an access or deletion request. Access to, or correction, update, or deletion of your personal information may be denied or limited by VettedIT if it would violate another person's rights and/or as otherwise permitted by applicable law.

When you make a request, we will send you an email to confirm that we received it. We may retain your personal data even after you have closed your account if reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, investigate security incidents, prevent fraud and abuse, enforce

our User Agreement, or fulfill your request to "unsubscribe" from further messages from us. We will retain anonymized information after your account has been closed.

We will respond to information access requests within a reasonable timeframe. If we require additional time to provide access to your information, we will acknowledge receipt of your request within a reasonable timeframe and promptly supplement our response within the time period required by applicable law.

Data Retention: Because managing your career is a life-long process, we retain all the information we gather about you in an effort to make repeat use of our sites more efficient, practical and relevant until you change or remove your personal information as described below. We may retain your information for as long as your account is active or as needed to provide you services, comply with our legal obligations, resolve disputes, and enforce our agreements.

If you are located in the European Union and you do not sign in to your account or interact with our services for more than five years , your account will expire and be scheduled for removal from our site. Expired accounts are deleted on a routine basis. If your account contains a resume, you will receive an email from us before we delete your resume in this manner.

#### Security

You are responsible for keeping your username and password secret.

The security of your personal information is important to us. We utilize a variety of safeguards to protect the personal information submitted to us, both during transmission and once it is received. VettedIT takes appropriate measures to secure your personal information from accidental loss and from unauthorized access, use, alteration or disclosure.

You should be aware that resumes and profiles may be monitored by your current employer.

When you place an order online at VettedIT, your credit card information is encrypted with industry standard encryption.

## Children

VettedIT is not intended for, nor do we knowingly collect information from, children under the age of 13. You must be 13 years of age or older to visit or use any VettedIT Site in any manner, and, if under the age of 18 or the age of majority as that is defined in Your jurisdiction, must use any VettedIT Site under the supervision of a parent, legal guardian, or other responsible adult.

# Changes to Privacy Policy

We may update this Privacy Policy to reflect changes in our information practices. If we make any material changes we will notify you by email (sent to the email address specified in your account) where required, or by means of a notice on this website prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

## **Contact Information**

Your data is submitted to VettedIT LLC and is hosted and stored in a database on servers situated in the United States. VettedIT LLC, a Maryland company with its principal place of business at 100 E 23rd St Suite 3A, Baltimore, Maryland 21218-5807, USA, is the legal entity determining the purposes and means of processing the information gathered on VettedIT sites and applications and is the data controller of all data VettedIT collects from you. VettedIT LLC is also a data controller of personal data collected on this site.

If, at any time, you have questions or concerns about this Privacy Policy, please contact us online or at:

VettedIT LLC 100 E 23rd St Suite 3A Baltimore, Maryland 21218-5807 USA

Email: hello@shippington.dev

Notice to California Residents: California Civil Code Section 1798.83 permits our visitors who are California residents to request certain information regarding our disclosure of personal information to third parties for the third parties' direct marketing purposes. To make such a request, please contact us online or write to us at the address provided above.

## Additional Privacy Information for VettedIT's mobile app

In addition to the information practices described above, the following section applies to VettedIT's collection and use of information collected via VettedIT's mobile app. When you use the app, VettedIT may collect and use information about you in the following ways:

- The app displays jobs sourced from third party job websites. If you apply to one of these jobs, VettedIT will send your information to that job website and that site may contact you regarding your application.
- VettedIT may collect a phone number from you for the purpose of sending you a text message with a link to download the VettedIT app. You agree that you own the number you provide and that you will not hold VettedIT responsible for text message charges.
- If you opt in, the app will collect your geographic location. Your location is used to show you jobs near you. Your location data is kept for 2 weeks in VettedIT's logs and for up to a year in log archives.

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