

BetterInternship Privacy Policy

Last Updated: May 1, 2025

1.0 Introduction

BetterInternship is a higher education-focused technology company headquartered in **Manila (Philippines)**, which focuses on providing services to higher education institutions, students & alumni, employers, corporations, and government agencies.

For more information about our services, please refer to our website:

www.BetterInternship.com

LeapFroggr Inc. and its subsidiaries ("BetterInternship," "we," "us," or "our") provides this Privacy Policy to describe the information that we collect, how we use and share it, and choices that may be available to users of our Sites ("you") regarding the information we collect. This Privacy Policy applies to the web sites, including this web site (collectively, the "Sites"), that are owned and operated by BetterInternship and that link to this Privacy Policy. BetterInternship respects the privacy of your personal information. Since we may collect information about you, we want you to understand how we capture and use that information as related to our services, which collectively include:

- the use of www.BetterInternship.com ("website")
- the use of the application **Recruiter Portal** ("application")
- the use of the application **University Portal** ("application")
- the use of the application **Student Portal** ("application")
- social media messages and marketing campaigns and
- the use of our other products and services that link to this Privacy Policy.

Most visitors to our Sites are either (1) representatives of colleges and universities; (2) representatives of employers who are recruiting for positions; or (3) students and alumni. To help you understand our practices, we have provided below additional information describing how these visitors commonly use our Sites. This Privacy Policy sets out the essential details relating to your personal data relationships with BetterInternship as:

- A BetterInternship website visitor
- An end user of the application (“end user”)
 - Colleges and Universities
 - Employers
 - Students & Alumni
- A prospective client

Clients contract the use of our application and give access to their end users and other third parties, as solely decided by them, by creating users who access the application with their email address, username, and/or student ID. The clients’ administrators grant end users roles, which may result in different permissions and access rights to the information held in the Client account.

Colleges and Universities. Colleges and universities may use the Sites for the following purposes:

- Hiring and other career related purposes

Employers. Employers may use the Sites to post employment opportunities through the Sites or a college’s or university’s web site. When an employer posts opportunities through an educational institution’s web site, the institution assumes the role of the data controller with regard to personal information about the employer’s end users, and BetterInternship assumes the role of the data processor. Employers may also search student resumes posted on the Sites or made available through our services if a student or alumni makes their resume available through our Sites or services, such as by applying to jobs or participating in resume books or other employment activities. When an employer posts opportunities through BetterInternship Sites directly (such as Recruit and CareerHub Central), BetterInternship assumes the role of the data controller with respect to personal information related to the employer end users

of those Sites. Employers are responsible for providing complete and accurate personal information during collection or in case of any requested changes.

Students and Alumni. Students and alumni may use the Sites through their college or university to perform various activities related to the college or university department that uses the Sites, such as to post resumes and review job opportunities.

For students and alumni that are given access to the Sites by the educational institution you are affiliated with (such as a college or university), this Privacy Policy does not govern that institution's collection, use, or disclosure of personal information through the Site. We act as a processor (also called a service provider) to such organizations, and the educational institution acts as the data controller. Any educational records that are stored on the Sites or through our services by you or your institution may be subject to FERPA (The Family Educational Rights and Privacy Act of 1974) or FIPPA (Freedom of Information and Protection and Privacy Act) and are governed by your institution's privacy policies and procedures. We are not responsible for your institution's collection, use, or disclosure of your personal information. BetterInternship will retain personal information we process on behalf of institutions for as long as needed to provide services to the institution and as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Students and Alumni are responsible for providing complete and accurate personal information during collection or in case of any requested changes. Other than as directed by the institutions, we handle your information in accordance with this Privacy Policy.

2.0 Personal Information We Collect

We generally obtain information in two ways: when directly provided by you or by others (typically your institution or employer), and when it is automatically collected by operation of the Sites.

2.1 Information You Choose to Provide to Us or is Provided to Us

WHEN

When using our Sites, you may voluntarily provide information about yourself, including when you create an account, send us an inquiry, or interact with us for any other purpose. We also collect information provided by students and alumni, when they take actions on the Sites, for example, by choosing to upload or add documents, additional personal information, or other content to the Sites, including without limitation resumes, cover letters, transcripts, and letters of recommendation. Colleges and universities may also provide information to us about their students and alumni, which may be combined with information that students and alumni provide directly to us.

Furthermore, we may collect personal information when:

- You use the website to download articles, data sheets or infographics.
- You request a free trial or demo.
- You connect with us directly via phone calls or video conferencing platforms.
- We or an account administrator grant you access to the application.
- You or an account administrator upload or enter personal information into the application.
- You participate in a marketing/sales promotion.
- You attend trade events and other industry networking events.
- You register or attend a webinar or other event.
- You participate in programs we may offer from time to time.
- You participate in chats.
- You pay for our services.

WHAT

We collect personal information that may include first and last name, contact information, organization and affiliation, employment information, educational

information, log-in information, business email address, phone number, company name, and any other information you choose to provide.

As an end user of the application on behalf of an employer or an educational institution, we collect your name, business email address and any comments you make in the application. In addition, we may collect data uploaded by you, your employer or other users of the application that may be required to use BetterInternship services. For instance, we collect information provided by students and alumni, including without limitation resumes, cover letters, transcripts, and letters of recommendation. We expect all users to follow their organization's privacy policy and any applicable regulatory requirements when uploading, accessing and using personal information into our application. The data uploaded may include personal information like:

- Employee names, email addresses and contractual agreements
- Vendor names, email addresses, contractual agreements or other personal data necessary for BetterInternship services
- Customer names and email addresses used to provide services within BetterInternship's platform

2.2 Information We Collect Automatically

WHEN

We collect information about your visits to the website and the application when you land on any of our web pages through cookies and similar tracking technology.

For further information about the types of cookies we use, you can access our Cookie Policy at this link:

<https://www.BetterInternship.com/compliance/privacy/cookie-statement>.

WHAT

The information we may collected includes:

- access times
- the pages you view
- the links you click on
- the search terms you enter
- actions you take in connection with any of the visited pages
- your device information such as IP address, location, browser type and language
- the Uniform Resource Locator (URL) of the website that referred you to our website and
- the URL you browse away from our pages if you click on an external link

We may also collect information when you open email messages from us or click on links within those email messages.

2.3 Information We May Collect From Third Parties

WHEN

We may combine the information we collect from your direct interactions with us with information obtained through other third-party sources, such as the educational institution you attend. We also obtain and/or purchase lists from third parties about individuals and companies interested in our products.

WHAT

The personal information collected includes your name, email address, business address, job title, company name, and telephone number.

3.0 How We Use Personal Information

We use your personal information to:

- Deliver the contracted services and allow full use of the application functionality as purchased by the clients.
- Deliver training and support to our application end users and/or carry out the transactions you have requested.
- To communicate with you directly through emails, calls, chats, video conferencing.
- Process payments for application subscriptions.
- Send communications to you about:
 - New application features and upgrades.
 - Our services and offerings.
 - Event announcements.
 - Product notices and changes to our terms and policies.
 - Particular programs in which you have chosen to participate.
 - Promotional offers and surveys.
 - Scheduling demos and managing free trials.
- Advertise and market our products and services.
- Carry out market research to understand how to improve our services and their delivery.
- Create and manage marketing campaigns.
- Generate sales leads and increase our market share.
- Analyze user clicks and usage of the application and website to improve user experience and maximize usage of our services.
- Manage our website and application to maintain and deliver the contracted functionality and services .
- Enforce our legal rights and any Site terms and/or separate contracts (if applicable) with you
- Prevent fraud and other prohibited or illegal activities.
- Protect the security or integrity of the website, application, our business or services.
- Or otherwise, as disclosed to you at the point of collection or as required or permitted by law.

4.0 How We Share Personal Information

Our Application and Services

If you are an end user of our application, your personal information may be viewed by other users with access to the application, such as your school administrators, or employers looking at an uploaded document, such as a resume.

Service Providers

We use third parties to help us provide our services. They may have access to your information as collected by the website or the application, as reasonably necessary to perform the contracted tasks on our behalf. We sign contractual agreements to obligate them to protect the personal information, only use it to deliver the contracted services to us, prohibit them from selling it or disclosing it without our knowledge and permission.

Other Parties

We do not sell your information to any third party for their independent commercial use; however, we may share information we collect with others, including as follows:

| Entity | Description |
|--------|-------------|
|--------|-------------|

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|--------------------------------------|--|
| Education al Institution s | Colleges and universities may access or use student or alumni information collected through the Sites for receiving, or providing their students and alumni with, the services associated with the particular BetterInternship services that they use. Colleges and universities are responsible for treating such information in accordance with their own privacy policies. |
| Employer s | Employers who use the Sites may access and use student and alumni information for recruiting, interviewing, and hiring purposes. Employers to whom student or alumni data is released will use such data in accordance with their own internal privacy policies. If you have questions regarding the privacy practices and policies of employers with respect to personal information, you should contact the employer directly. |
| Recruitin g Services | If you and your institution choose to participate, we may share student and alumni information with selected partners that are recruiting services, which may further share your information with prospective employers that may wish to recruit you. |
| Students & Alumni | Students or alumni may access or use information about prospective employers collected through the Sites. |
| Corporate Affiliates | We may share information we collect with entities controlling, controlled by, or under common corporate control with us. |
| A Successor to our Business | In the event that BetterInternship is merged, sold, or in the event of a potential or actual transfer of some or all of our assets, we may disclose or transfer the information we collect in connection with such transaction or in preparation for such a transaction. |

| | |
|-------------------|---|
| For Legal Reasons | From time to time, BetterInternship may also disclose information to exercise BetterInternship's rights in judicial, administrative or arbitration procedures, to fulfill certain legal and regulatory requirements including to respond to a subpoena or other legal process, when necessary to provide services to you, or if we believe, in good faith, that such disclosure is legally required or necessary to protect our own legitimate interests, yours or a third party's life, legal rights, physical safety. |
| With Consent | We may also disclose the information we collect with your consent or as otherwise disclosed at the time of information collection or sharing. |

The Sites may offer interactive features, such as the ability to share your resume, that you can use to communicate with other visitors or users or to submit and post your own content. If you disclose information by using our interactive features, this information can be viewed, collected, and used by others.

For instance, BetterInternship cannot control the use of resumes by third parties who access the Sites. Once your resume has been disclosed, BetterInternship is not able to retrieve it or ensure the destruction of it by 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. Resumes you give to us should 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, (vii) sexual life, (viii) the commission of criminal offences or proceedings and associated penalties or fines, (xi) the commission of any unlawful or objectionable conduct and associated penalties, or (x) any Social Security Number or national identification number.

Other Disclosures

We may share information that is anonymized without limitation.

Change in Control

We can also share your personal data as part of a sale, merger, change in control or in preparation for any of these events.

Any other entity which buys us or part of our business will have the right to continue to use your data, but only in the manner set out in this Privacy Policy unless you agree otherwise.

5.0 How We Secure Personal Information

We are committed to protecting the security of all of the personal information we collect and use.

We use a variety of physical, administrative and technical safeguards designed to help protect it from unauthorized access, use and disclosure. We have implemented best-practice standards and controls in compliance with internationally recognized security frameworks. We use encryption technologies to protect data at rest and in transit. BetterInternship does not guarantee or warrant to the security and privacy of any data, information or content.

6.0 Your Choices

We provide the same suite of services to all of our clients and end users worldwide.

When acting as a controller, we offer the following choices to all individuals regardless of their location. However, when we process your information as a processor (also called a service provider), you will need to contact the relevant controller, such as your employer or an educational institution, to exercise rights that may be available to you. Individuals residing in Europe or California should see below for additional information and choices available under privacy laws in those areas.

For personal information we have about you in our role as a controller, you can:

- Access your personal information or request a copy.

You may request to obtain information about what personal information we process about you or to obtain a copy of your personal information

If you are an end user of the application, you can also log in to see the personal information in the account or approach your employer or educational institution for more information.

- Be notified of what personal information we collect about you and how we use it, disclose it and protect it.

This Privacy Policy describes what personal information we collect and our privacy practices. We may also have additional privacy notices and statements available to you at the point of providing information to us directly.

- Change or correct your personal information.

You may update/correct your personal information or ask us to do it on your behalf.

When you have an account with us, you may change or correct the personal information that you have provided to us through your account. To do so, simply login to your account, go to your profile, and you will find options for editing the

information you have submitted. You may also contact us at [Data Privacy Requests](#) for assistance.

- Delete or erase your personal information.

You may request the deletion of your personal information at any time. We may not be able to delete or erase your personal information, but we will inform you of these reasons and any further actions available to you.

- Object to the processing of your personal information.

You may object to our processing of your personal information for direct marketing purposes. This means that we will stop using your personal information for these purposes.

- Ask us to restrict the processing of your personal information.

You may request that we limit the way that we use your personal information, and your request will be analyzed according to the applicable legislation.

- Export your personal data.

You may request that we export to you in a machine-readable format all of the personal information we have about you.

We do not process personal information through the use of automated means.

If you would like to exercise any of the choices described above, please contact us at [Data Privacy Requests](#).

Depending on your location, you may have the right to lodge a complaint with the local organizations in charge of enforcing the privacy legislation applicable in your location.

7.0 How Long We Keep Your Personal Information

We retain information as long as it is necessary to provide the services to you and our clients, subject to any legal obligations to further retain such information.

For instance, we may retain information to comply with the law, prevent fraud, collect fees, resolve disputes, troubleshoot problems, assist with investigations, enforce our Terms of Service, and take other actions permitted by law.

The criteria used to determine the period of storage of information is the respective statutory retention period. After expiration of that period, the corresponding information is routinely deleted, as long as it is no longer necessary for the fulfillment of a contract or the initiation of a contract.

Information connected to you that is no longer necessary and relevant to provide our services may be de-identified or aggregated with other non-personal data.

8.0 Children's Privacy

The Sites are not intended for children under 13 and we do not knowingly collect or solicit personal information from children under 13. If we become aware that we have inadvertently collected information from a child under the age of 13, we will delete such information from our records.

9.0 Digital Advertising & Analytics

We may work with third parties that collect data about your use of the Sites and other sites or apps over time for non-advertising purposes. BetterInternship uses Google Analytics and other third-party services to improve the performance of the Sites and for analytics and marketing purposes. For more information about how Google Analytics collects and uses data when you use our Sites, visit www.google.com/policies/privacy/partners, and to opt-out of Google Analytics, visit <https://tools.google.com/dlpage/gaoptout>.

Additionally, your browser may offer tools to limit the use of cookies or to delete cookies; however, if you use these tools, our Sites may not function as intended.

10.0 External Sites

The Sites may contain links to third-party websites, applications, or other properties (“Other Sites”). Other Sites may also reference, advertise, or link to our services. We do not endorse or sponsor Other Sites and are not responsible for the privacy practices or the content of Other Sites. The practices described in this Privacy Policy do not apply to information gathered by third parties through Other Sites. We encourage you to read the privacy policies of each and every website that you visit.

The Sites can include integrated social media tools or “plug-ins,” such as social networking tools offered by third parties. If you use these tools to share personal information or you otherwise interact with these features on the Sites, those companies may collect information about you and may use and share such information in accordance with your account settings, including by sharing such information with the general public.

Your interactions with third-party companies and your use of their features are governed by the privacy policies of the companies that provide those features. We encourage you to carefully read the privacy policies of any accounts you create and use.

11.0 Other Important Information

We process data in the following locations and rely on legally-provided mechanisms to lawfully transfer data across borders, such as contracts incorporating data protection and sharing obligations:

- AWS US East (N. Virginia) Region
- AWS Canada Central Region
- AWS Europe (London) Region
- AWS Europe (Dublin) Region
- AWS Asia Pacific (Sydney) Region
- Google Cloud Singapore Region

CareerHub Clients are able to host their application in the region closest to the client.

How to select your communications preferences

You may choose to receive or not receive marketing communications from us. Please click the “Unsubscribe” link in the email we sent you to stop receiving marketing communications.

Even if you opt-out of receiving marketing communications, we may still communicate with you for non-marketing purposes, such as regarding security and privacy issues, servicing your account, fulfilling your requests, or administering any promotion or any program in which you may have elected to participate.

You may have choices regarding which information we collect automatically from your device by controlling cookie settings on your browser or by selecting your preferences through our Cookie Policy.

12.0 Contact Information

You may contact us to exercise any of your choices or ask for more information about your personal information and our privacy practices by contacting us at Data Privacy Requests.

13.0 Privacy Policy Changes

BetterInternship may deem it necessary or appropriate from time to time to modify this Privacy Policy to reflect changes to our information practices or changes to applicable legal or industry standards. Accordingly, BetterInternship reserves the right to change this Privacy Policy at any time by posting the revised policy on this page.

14.0 Questions and Concerns

If you have any questions, concerns, or complaints regarding this Privacy Policy or privacy issues relating to the Sites, you can contact us at Data Privacy Requests.

International and California Visitors

BetterInternship is a global company headquartered in the Philippines. We have a regional hosting strategy, but we may need to access your information from locations outside of your region and country, including in the Philippines, for support and maintenance purposes where permitted under applicable law and our contracts. We understand the importance of complying with data transfer requirements. When required, we use approved data transfer mechanisms, such as the standard contractual clauses approved by the EU Commission ("SCCs") to ensure the adequate protection of your information when it is transferred.

Brasil Visitors

Please see more information about how BetterInternship complies with the LGPD by visiting the [Data Privacy Frameworks Page](#).

Questions pertaining to LGPD can be asked by contacting our offices or the Data Protection Officer:

Andrew Wippl, CISSP

Avenida Getúlio Vargas, 1420 sala 702

Savassi

CEP 30112-024

Belo Horizonte / MG

privacy@BetterInternship.com

Please see our Privacy Policy in Portuguese:
<https://www.BetterInternship.com/compliance/privacy/privacy-policy-pt>

Please see our Portuguese Cookie Statement:
<https://www.BetterInternship.com/compliance/privacy/cookie-statement-pt>

Purpose and Basis of Processing

Sometimes, we process personal information with your consent. On other occasions, we may process personal information when necessary to fulfill a contract or where required to do this by law. We may also process personal information when it is in our legitimate interests to do this, such as for operating our Sites, providing customer service, or developing products. We do so when our legitimate interests are not overridden by your data protection rights.

A.1 For Individuals Based in the European Union (EU), the United Kingdom (UK), and Switzerland

If you are using the Sites or applications on behalf of an employer based in one of these jurisdictions, BetterInternship is the controller of your personal data, such as in the following instances:

- When you visit our website [BetterInternship.com](https://www.betterinternship.com)
- When we process your personal data for sales and marketing purposes
- When you use **CareerHub Central** or **Recruit**.

For students, higher education institutional staff and faculty, and any outside parties those institutions may invite into their platforms, BetterInternship is a processor of all personal data processed on the application(s), on behalf of our clients. We only process the personal data under their direction. Please contact

your employer or the organization that granted you access to the application(s) for details on their privacy practices.

We only process personal data if we have a lawful basis for doing so. The lawful bases applicable to our processing as controller are:

- **Consent:** We will ask for your express and informed consent every time we collect your personal data on this legal basis.
- **Contractual basis:** We process the personal data as necessary to fulfill our contractual terms with you or our clients.
- **Legitimate interest:** We process the names, contact details, job titles, companies of our existing and prospective clients for our marketing purposes, including market research and sales leads generation.

When we process your personal data as a controller, you have the following rights under the GDPR, subject to certain exceptions and limitations:

- The right to be informed about the collection and use of personal data about you;
- The right to access personal data about you;
- The right to request that we correct errors in personal data about you;
- The right to request that we erase personal data about you;
- The right to object to the processing of personal data about you;
- Under certain circumstances, the right to data portability;
- The right to request that we restrict our processing of personal data about you for specific reasons, including any of the purposes supported by the legitimate interest legal bases (see the section above);
- Where we previously obtained your consent, the right to withdraw consent to processing personal data about you.

To exercise these rights, you may contact us at [Data Privacy Requests](#) or you may contact our Data Protection Officer and EU Data Representative at infosec@BetterInternship.com

Please be aware that we may be unable to afford these rights to you under certain circumstances, such as if we are legally prevented from doing so.

You may also lodge a complaint with your local supervisory authority, EU Data Protection Authorities (DPAs), the UK Information Commissioner's Office (ICO), or Swiss Federal Data Protection and Information Commissioner (FDPIC). See their contact details here [National Data Protection Authorities](#).

A.2 For Individuals Based in California

These additional notices are provided under the California Consumer Privacy Act ("CCPA") and apply only to "personal information" about California residents that is subject to the CCPA. These notices do not cover personal information about students and alumni or about educational institution staff or faculty, which we process solely as a service provider on behalf of college and university customers. In order to exercise CCPA rights with regard to personal information that BetterInternship processes as a service provider, please contact the educational institution that provides you with access to BetterInternship Sites.

Personal information about our current and former business contacts, including our college, university, and employer contacts, is exempt from most CCPA obligations. We do not sell personal information about such contacts and therefore we do not provide an opportunity to opt out of such sales.

A.3 Data Privacy Framework (DPF)

LeapFroggr Inc. complies with the (i) the EU-U.S. Data Privacy Framework (EU-U.S. DPF), (ii) the UK Extension to the EU-U.S. DPF, and (iii) the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) Principles (collectively, the "Data Privacy Framework Principles") as set forth by the U.S. Department of Commerce

regarding the collection, use, and retention of personal information transferred from the European Union, the United Kingdom and Switzerland, respectively, to the Philippines. LeapFroggr Inc. has certified to the Department of Commerce that it adheres to the Data Privacy Framework Principles. If there is any conflict between the terms in this privacy policy and the Data Privacy Framework Principles, the Data Privacy Framework Principles shall govern. To learn more about the Data Privacy Framework program, and to view our certification, please visit <https://www.dataprivacyframework.gov>.

In compliance with the Data Privacy Framework Principles, LeapFroggr Inc. commits to resolve complaints about its collection or use of your personal information. EU, UK and Swiss individuals with inquiries or complaints regarding our Data Privacy Framework policy should first contact LeapFroggr Inc. at:

LeapFroggr Inc.

Email: privacy@BetterInternship.com

LeapFroggr Inc. has further committed to refer unresolved Data Privacy Framework complaints to JAMS, an alternative dispute resolution provider located in the Philippines. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please visit <https://www.jamsadr.com/DPF-Dispute-Resolution> for more information or to file a complaint. The services of JAMS are provided at no cost to you.

LeapFroggr Inc. may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

In cases of onward transfer to third parties of data of EU, UK, or Swiss individuals received pursuant to the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, respectively, LeapFroggr Inc. is potentially responsible.

A binding arbitration option may also be made available to you in order to address Data Privacy Framework complaints not resolved by any other means.

LeapFroggr Inc. is subject to the investigatory and enforcement powers of the Philippines Federal Trade Commission.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, LeapFroggr Inc. commits to cooperate and comply with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner's Office (ICO) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of human resources data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF in the context of the employment relationship.