

Privacy Policy

Last Updated and Effective: July 9, 2021

We appreciate your trust in our products and services. In order to provide the CareerPaths marketplace platform through our mobile application, and through the services we provide (collectively, the website, application, and services referred to as our "Site"), and continue to make them better, ("CareerPaths," "we," "us," or "our") collects information from you.

This Privacy Policy explains how CareerPaths collects, stores, uses, transfers, and discloses your information.

From time to time, CareerPaths may revise this Privacy Policy. We will give you notice by posting the revised Privacy Policy on our Site and updating the "Last Updated and Effective" date at the top of this Privacy Policy; we may also notify you in other ways, such as through the contact information you have provided or via a pop-up notification on our Site. Any changes to this Privacy Policy will be effective immediately on posting the updated Privacy Policy unless otherwise stated or as required by applicable law (for example, a different form of notice and your opt-in or opt-out consent, etc.). By continuing to use our Site, you agree to the revised Privacy Policy to the fullest extent permitted by applicable law.

Please also review the applicable Terms of Service, which also apply to use of our Site. Terms that are defined in the Terms of Service have the same meaning in this Privacy Policy.

You should read the policy in full, but here are a few key things:

When you use our Site, even if you're just browsing, we receive some information from you, such as the type of device you're using and your IP address.

You can choose to share additional information with us, such as your email address, by creating an account, making purchases, or providing content to our Site.

If you have questions about this policy, how we collect or process your personal data, or anything else related to our privacy practices, we want to hear from you; see [Contact Us](#).

1. Scope of CareerPaths Privacy Policy

This Privacy Policy applies to all aspects of our Site as well as to information we may collect offline.

This Site may link to or incorporate websites or content hosted and served by others over which we have no control, such as third party websites, online properties, platforms, social media, or systems, which are each governed by the privacy policy and business practices of the third party. You understand and agree that CareerPaths is not responsible for the security, privacy, or business practices of any third party.

2. Information We Collect

We collect information from you directly, automatically when you visit the Site, and sometimes from third parties. Some of this information may be considered "personal

information" under various applicable laws. We consider information that identifies you as a specific, identified individual to be personal information (such as your name, telephone number, and e-mail address), as well as additional information, including IP addresses and cookie identifiers, where required by applicable law. And, if we combine information that we consider to be non-personal with personal information, we will treat the combined information as personal information under this Privacy Policy. Note that we may de-identify personal information so that it is non-personal, such as by aggregating it or converting it to a code, sometimes using a function known as a "hash." We will treat de-identified information as non-personal to the fullest extent permitted by applicable law.

(a) Information You Provide

CareerPaths may collect personal information from you when you:

Create an Account on, Login to, or Interact with the Site. CareerPaths collects your name and email address and the other information that you provide, such as a telephone number, when you register or login, update, or add information or content to your account. We require you to create a username and password if you create an account, although we may enable other methods such as logging in through one of your existing social media accounts such as Facebook, Instagram, and Twitter (collectively, "Social Media Platforms") or your Apple ID. CareerPaths also collects certain information relating to any Social Media Platform account or Apple ID that you use to login to or link to your CareerPaths account (such as your username, bio, and number of followers), although linking any such account to your CareerPaths account or logging into CareerPaths via such account is entirely up to you. We may store payment information (such as credit or debit card details) but only if you choose to save it to your account. If you create an account using a CareerPaths-provided referral link or code through one of our referral programs, we also receive certain information relating to your use of the unique link.

Make a Purchase through the Site. CareerPaths collects the information that you provide when you request a CareerPaths Video or other offering, including, for example and as applicable, your name and email address, any mobile telephone contact number (of you or the recipient) you choose to provide, the name of the recipient, and the details that you provide as part of your request. When you purchase merchandise, we also collect shipping and delivery information. CareerPaths processes payment information you provide when you pay for a purchase. We collect information of the recipients that you provide to us to the extent necessary to provide the CareerPaths offering, either as part of the content or for the transaction itself (for example, we share the recipient's name and the details of the request with the applicable CareerPaths "Professional User") or to deliver merchandise.

Participate in Sweepstakes, Contests, or Other Promotional Activities. CareerPaths collects the information that you provide when you enter a sweepstakes, contest, or promotional activities (each, a "Promotion") through our Site. Each Promotion has its own terms and conditions or official rules, which you should review as they may contain other requirements (such as, allowing use of your name or likeness in advertising unless prohibited by applicable law).

Contact Customer Service through the Site. CareerPaths collects the information that you provide in connection with us providing you customer service.

Provide Content to the Site. We collect information when you submit content to us, such as a video, review, photo, email, text, social media post, or other communication (each, a "Submission") and, if you are a Professional, when you submit "Professional Content". Each Submission, whether submitted to our Site directly or through a Social Media Platform, and all Professional Content, is subject to the applicable Terms of Service. As a result, others may access it, use it, and share it in accordance with the Terms of Service.

Sync Contacts or Connect with Friends. If you choose to upload, sync, or import the contact information of your contacts from your device (such as your address book), or otherwise share such contact information with us, we will collect and store that information in accordance with this Privacy Policy. You represent that you have obtained the consent of your contacts to share this information with us. We may use this information to identify which of your contacts are users of the Site, to provide services to you, to help you find and connect with people you know, help others find and connect with you, and to customize the content we present to you and to other Site users.

Use Social Media with the Site. We collect information when you interact with our Site through any "Social Media Platform"). For example, we may enable you to use certain of your existing Social Media Platform accounts to create an account on our Site or "like" or "share" content from our Site. Doing so may allow us to collect (or the third party to share) information about you. Some of your information, such as your username, may be publicly displayed. We may also receive information about you if other users of a Social Media Platform give us access to their profiles and you are one of their connections or "friends". In addition, we and the Social Media Platform may have access to information about you and your use of our Site and the Social Media Platform. The information we collect is subject to this Privacy Policy. The information that any third party collects is subject to its privacy practices (including whether it shares information with us, the types of information shared, and your choices about what may be visible to others).

Use the Site as a Professional User. When you use our Site to become or as a Professional User, we collect, in addition to information provided when you create your account, your name, email address, telephone number, and the social media usernames you provide, CareerPaths Videos and other offerings prepared by you, and other information relating to our relationship with you, such as payment information. CareerPaths's payments to you are made through the third party payment provider selected by CareerPaths. You should review the payment provider's privacy policy before providing your personal information, as it is responsible for personal information (as a data controller if you're in the UK or EEA) in its own right, and its privacy practices may vary from ours.

Become a CareerPaths Partner. When you become a "CareerPaths Partner" including through our Site, in addition to information you provide if you create an account on the Site, we collect your name, email address, telephone number, and other information relating to our relationship with you, including payment information. CareerPaths's payments to you are made through the third party payment provider selected by CareerPaths. You should

review the payment provider's privacy policy before providing your personal information, as it is responsible for personal information (as a data controller if you're in the UK or EEA) in its own right, and its privacy practices may vary from ours.

Apply for a Job with CareerPaths. We collect the information you provide when you apply for a job with us (for example, through the "Jobs" link on our Site) or directly; this may include your name, contact information, employment history, educational background, any self-identifying information (such as veteran status, gender, and ethnicity) and other information you provide. Please note that your use of a third party tool or third-party applicant tracking system utilized by CareerPaths (e.g., LinkedIn, Indeed, etc.) to apply is subject to the third party's privacy policy.

(b) Information from Third Parties

We may also obtain information, such as contact details (for example, name and email address), country, IP address, purchase histories, marketing preferences, cookie information, hardware and software information and other technical information about you from third parties, such as other users of the Site who upload information or sync their contacts, analytics companies, Social Media Platforms, and other third party business partners, such as a CareerPaths Partner. For example, if you discuss becoming a Professional User through a CareerPaths Partner, we will collect your name, email address, telephone number, and the social media usernames you provide relating to that relationship from the CareerPaths Partner.

We and our third party business partners may collect information about your visits to and activity on our Site and other websites and services. We may combine that information with other personal information we have collected from or about you. We may share certain of this information with third party business partners for similar purposes.

3. Cookies and Tracking Technologies

(a) Cookies and Tracking

When you visit our Site or otherwise interact with us or our content, we and third-party advertising and analytics companies and other third party business partners may use a variety of tracking and other technologies that automatically or passively collect certain information ("Usage Information").

We may use these technologies for a number of reasons, including to save your preferences for future visits, to our Site, keep you logged in between visits, to serve targeted advertising to you, and to provide you with improved services. The information we collect may include (but is not limited to):

- date and time of your visit to our Site;
- areas you visit within our Site;
- links that you click on within our Site;
- websites or advertisements you visit before or after visiting our Site;
- terms you entered into a search engine that lead you to our Site;
- IP address, mobile device identifier, or other unique identifier and usage information for the device used to access our Site;

- precise location data from your device, if you have opted-in to the collection of that information (you may be able to disable the collection of precise location data through the settings on the device used to access our Site, but your approximate location may remain available through its IP address or other information that we collect);
- device and connection information, such as browser type and version, operating system, and platform; and
- whether an email message we sent was opened and whether a link in the email message was clicked.

The methods that may be used to collect Usage Information include the following:

Cookies and Local Storage. A cookie is a data file placed on a device when it is used to visit the Site or otherwise access our content. Certain web browsers and certain browser add-ons, such as Adobe Flash, may provide additional local data storage mechanisms that are used in a manner similar to cookies, and some of the content included on our Site may make use of this local storage. To get information about Flash and Adobe's privacy choices from Adobe, [click here](#). To get information about cookies from All About Cookies.org, [click here](#). Cookies, Flash cookies, and other local storage devices may be used for a variety of purposes (for example, to identify your device when you revisit our Site, to recall your authentication information, to store information related to your navigation throughout our Site, or to enable certain features on our Site). Some cookies are essential to the functioning of the Site, and, without them, some features and services you have requested cannot be provided. If you disable cookies, adjust privacy settings on your device, restrict local storage, or otherwise limit these technologies, you may not be able to use some of our Site features.

Web Beacons. Small graphic images or other web programming code called web beacons (also known as "pixels", "1x1 GIFs" or "clear GIFs") may be included in our web pages and email messages. Web beacons may not be visible to you. Web beacons or similar technologies may be used for a number of purposes, including to count visitors to the Site, to monitor how users navigate the Site, to count how many email messages we sent were opened, and to count whether a link in an email message we sent was clicked.

Embedded Scripts. An embedded script is a programming code that is designed to collect information about your interactions with the Site, such as the links you click on. The code is temporarily downloaded onto your device from our server or a third party service provider, is active only while you are connected to the Site, and is deactivated or deleted after you are no longer connected.

Other Technologies. We may also use other technologies that collect similar information for security and fraud detection purposes.

(b) "Do Not Track" Signals

Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. There is no consensus among industry participants as to what "Do Not Track" means in this context. Like many websites and online services, CareerPaths does

not currently alter our practices when we receive a "Do Not Track" signal from a visitor's browser except as specifically required by law.

4. How We Use Information

We may combine information that we have received from you with information from other sources to operate, tailor content, personalize, adjust, and improve our Site. We use your information:

to fulfill your request for a CareerPaths Meeting or other offering or purchase of merchandise, accept your payment, ship and deliver your orders, deliver email messages, and process information you provide through our Site;

to maintain your account, to assist with payment transactions, to facilitate use of the Site, and to communicate with you about your account, our relationship with you, and your use of the Site, such as by verifying your information, requesting that you respond to a survey, or checking on the status of an order or request. We may send you text messages if you have provided us with your mobile telephone number for that purpose;

to establish and manage a relationship with you as a Professional User or a CareerPaths Partner;

to send you promotional email or text messages communications from CareerPaths (not from any third party) if you have opted in to receive them. To stop receiving email messages, click on the "unsubscribe" link in the footer of the promotional email; please note that even if you unsubscribe, we may send you communications relating to your account or use of the Site, such as administrative and services announcements.

to conduct and administer a Promotion if you have chosen to participate. We will not share your information with a third party for the third party's marketing or promotional purposes unless you agree when you choose to participate in the Promotion;

to provide you and others with customer service, to assist in resolving issues, and to evaluate and improve our customer service and processes;

to use any Submission or Professional Content as set forth in the applicable Terms of Service, which may include the public display of some information, such as your name, username, or where you reside;

to consider your job application and, in connection with the application, to fulfill legal reporting requirements, for internal business purposes (such as to evaluating and improving our recruiting processes), or to defend against employment-related claims;

to contact you about administrative matters, such as the applicable Terms of Service, or other issues;

to better understand your personal preferences and to enable us to provide you with improved and personalized communications and services;

to compile aggregate data about Site traffic and interaction;

to tailor the content and advertising we display to you or others, on our Site or elsewhere, and to analyze trends and statistics;

to create advertising models through lookalike modelling or other research methodologies;

for internal business purposes, such as improving our Site, products, and services and to comply with legal requirements and our business practices, such as our recordkeeping, backup, and document retention policies; and

for other reasons that (a) we disclose when asking you to provide your information, (b) with your consent, or (c) as described in this Privacy Policy.

5. How We Share Information

We share non-personal information, such as aggregated statistics and de-identified information, with third parties to the extent permitted by applicable law. CareerPaths also shares personal information as provided below in more detail. We do not share personal information with any third party to use for its own marketing or promotional purposes without your consent.

(a) Our Affiliates

We share information with our affiliates, as relevant, who use it for the same purposes for which we use it. For information about CareerPaths affiliates, [click here](#).

(b) Third Parties Providing Services on our Behalf

We use third parties to perform certain services on our behalf, such as hosting the Site or Site features, providing website usage analytics, fulfilling orders, processing payments, sending email or other communications, providing marketing assistance and data analysis or enhancement, running Promotions, or performing other administrative services. We may share information about you with these third parties to allow them to execute, deliver, or improve the services that they provide for you and for CareerPaths.

(c) CareerPaths Partners

If you are a Professional User, we may disclose your information to the CareerPaths Partner who introduced you to us in connection with the services that the CareerPaths Partner is providing and for the CareerPaths Partner's business purposes (for example, record-keeping and tax reporting).

(d) Employment Applications

If you apply for a job with CareerPaths or any of our subsidiaries or affiliates, we or our service providers may ask you to provide self-identifying information (such as gender, and ethnicity) in conjunction with laws and regulations enforced by regulatory agencies. Providing such self-identifying information is voluntary, but if you do provide such information, we and our service providers may submit that information to the appropriate

government or regulatory agencies to fulfill reporting requirements and use that information to defend against employment-related complaints.

(e) Sweepstakes, Contests, and Other Promotional Activities

If you participate in a Promotion, we may disclose your information to third parties or to the public in connection with conducting and administering the Promotion, for example, to select a winner, provide a prize, as required by applicable law (such as publishing a list of winners), or as permitted by the applicable terms and conditions or official rules of the Promotion.

(f) When You Request That We Share Your Information

We may share information when you request us to do so, for example, if you opt-in to receive a communication from a third party or if you engage with a Social Media Platform or other third party application or feature through which information about you is shared.

(g) Administrative Reasons, To Enforce and Protect Legal Rights

To the extent permitted by applicable law, we will disclose your personal information pursuant to a law, regulation, court order, or other legal request or process, such as disclosure to law enforcement or other government officials or agencies in connection with any investigation, for example of fraud, intellectual property infringement, or any other activity that is or may be illegal or may expose CareerPaths, you, or another to legal liability. This disclosure may include legal requests from a jurisdiction outside of the United States when we have a good faith belief that the response is required by law, regulation, court order, or other legal request or process in that jurisdiction, affects users in that jurisdiction, and is consistent with internationally-recognized standards.

We will disclose your personal information when necessary to exercise, enforce, establish, or defend our legal rights. For example, we may review your account information in order to investigate allegations of hacking or a breach of the applicable Terms of Service. We will disclose your personal information to our legal and other advisors, consultants, and law enforcement or other government entities.

(h) Protecting Others

We will disclose your personal information to third parties when we believe the disclosure is necessary to protect rights, property, or safety of another. For example, we disclose personal information relating to a Site account if we in good faith believe that a Site account is being used in ways that are harmful to another or contrary to the applicable Terms of Service.

(i) Business Transfers

In evaluating or engaging in a sale of assets, merger, acquisition, reorganization, bankruptcy, or other transaction, we reserve the right to disclose, transfer, or assign your personal information and communications. By providing your personal information, you agree that we may transfer such information to the acquiring entity without your further consent.

6. Children and Parents

Our Site is intended for a general audience and not for use by anyone younger than the age of 16. We do not knowingly collect personal information from children younger than the age of 16, without the consent of a parent or legal guardian; if we learn that we have done so, we will promptly remove the information from our active databases. If you are a parent or legal guardian who believes that we have collected or used your child's personal information without your consent, please contact us; see Contact Us.

7. Your Choices

(a) Marketing Preferences

To stop receiving promotional email communications from CareerPaths, click on the "unsubscribe" link in the footer of the promotional email. As noted above, we may send you email communications relating to your account or use of the Site even if you have unsubscribed.

(b) Third Party Advertising and Analytics Companies and Your Choices

CareerPaths works with third party network advertisers, ad agencies, and other advertising partners to serve CareerPaths ads online. We may use information we have learned about you to target ads to you and to allow third parties to target ads to you. We also use third party analytics providers to provide us with information regarding the use of the Site and the effectiveness of our advertisements. These third parties may set and access their own tracking technologies on your device (including cookies and web beacons), and they may otherwise collect or have access to information about you, including Usage Information. We and our third party advertising and analytics providers may collect personal information over time when you visit the Site or other online websites and services.

We may share non-personal information, including information that has been de-identified, aggregated user statistics, and Usage Information, directly or indirectly through third party business providers, with third party advertising companies, analytics providers, and other third parties, including for the purpose of serving you more relevant ads. We may retain third party providers to help us perform these tasks. For example, we may share personal information with third parties who combine and link information from CareerPaths with information from other sources. These third party providers may then make non-personal information available to third party advertisers, including information about your interests and preferences, to enable them to serve you more relevant ads.

For mobile applications, you may be able to limit certain advertising practices using the settings on your mobile telephone, tablet, or other mobile device.

CareerPaths uses Google Analytics. Google Analytics uses cookies and similar technologies to collect and analyze information about the use of the Site and report on activities and trends. This service may also collect information regarding the use of other websites, apps, and online resources.

Opting out through these mechanisms does not block all online advertising; you will continue to receive generic advertisements.

8. Accessing Personal Information and Retention Period

(a) Accessing Your Account

Please note that if you choose not to provide us with certain personal information, we may not always be able to provide you with the relevant CareerPaths product or service that you request. For example, without providing an email address, you will not be able to create a Site account.

If you have a Site Account, you may access, view, correct, or update certain personal information collected about you, as well as deactivate or delete the account through the account services portal on CareerPaths.io or in the mobile application. Professional Users may also deactivate their account by contacting their CareerPaths talent representative.

If you have any concerns about how we are using your personal information, would like to access, correct, or delete the personal information that you have provided to us, please contact us; see Contact Us.

(b) Retention Period

When you request that we delete your personal information, we will take commercially reasonable steps to remove it from our active databases but will keep original information consistent with our business practices to the extent permitted by applicable law (for example, for purposes of dispute resolution, enforcement of agreements, complying with legal requirements, recordkeeping, backup, and document retention).

9. Data Security

CareerPaths takes commercially reasonable security measures to protect the information submitted to us. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure and you use our Site and transmit information to us at your own risk. If you have any questions about security on our Site, please contact us; see Contact Us.

Information CareerPaths Collects. The following table lists the categories of Personal Information that we have collected from our users and disclosed over the last 12 months. The Personal Information we collect and disclose about you will depend on how you use our Site or otherwise interact with us. In addition to the below, we may collect and/or disclose additional types of information, and we will do so after notifying you and get your consent

Category of Personal Information Collected	Categories/Sources of Personal Information	Business/Commercial Purposes for which Personal Information is Collected	Categories of Third Parties to whom Personal Information is Disclosed for a Business Purpose
Identifiers	We may collect this type of information from these sources as detailed in Information We Collect : <ul style="list-style-type: none">• Consumers• Cookies and Tracking Technologies• Third Party Service	We may use this type of information as detailed in How We Use Information : <ul style="list-style-type: none">• To fulfill your request, process your payment, deliver your orders, communicate with you, and provide customer service	We may disclose this type of information as detailed in How We Use Information and How We Share Information : <ul style="list-style-type: none">• Service Providers, such as third parties who deliver our communications

	<p>Providers</p> <ul style="list-style-type: none"> • Third Party Social Media Companies • Third party Business Partners • Third Party Data Resellers 	<ul style="list-style-type: none"> • To maintain your account • If you are a Professional User or CareerPaths Partner, to establish and manage our relationship and assist with a transaction • To use Submissions and Talent Content as set forth in the applicable Terms of Service • To contact you about administrative matters • To conduct and administer sweepstakes, contests, or promotions • To understand your preferences and provide improved services • To tailor the content and advertising we display on our Site and elsewhere • To analyze Site traffic and interaction • To create advertising models • To consider your job application • For internal business purposes, such as to comply with legal requirements and business policies and/or to protect the Site, ourselves, and our users 	<ul style="list-style-type: none"> • Third parties we partner with for contests, sweepstakes, or promotions • Third party advertising and analytics companies • Other third parties (including government agencies) as required by law or in connection with court proceedings (such as pursuant to subpoenas or court orders) • Third parties who may acquire your information as a result of a merger, acquisition or other ownership transition • Third parties when you agree to or request that we share your information with them
<p>The categories of personal information</p>	<p>We may collect this type of information from these sources as detailed in Information We Collect:</p> <ul style="list-style-type: none"> • Consumers • Cookies and Tracking Technologies • Third Party Service Providers • Third Party Social Media Companies • Third party Business Partners • Third Party Data Resellers 	<p>We may use this type of information as detailed in How We Use Information:</p> <ul style="list-style-type: none"> • To fulfill your request, process your payment, deliver your orders, communicate with you, and provide customer service • To maintain your account • If you are a Professional User or CareerPaths Partner, to establish and manage our relationship and assist with a transaction • To use Submissions and Talent Content as set forth in the applicable Terms of Service • To contact you about administrative matters • To conduct and administer sweepstakes, contests, or promotions • To understand your preferences and provide improved services • To tailor the content and advertising we display on our Site and elsewhere • To analyze Site traffic and interaction • To create advertising models • To consider your job application • For internal business purposes, such as to comply with legal requirements and business policies and/or to 	<p>We may disclose this type of information to as detailed in How We Use Information and How We Share Information:</p> <ul style="list-style-type: none"> • Service Providers, such as third parties who deliver our communications • Third parties we partner with for contests, sweepstakes, or promotions • Third party advertising and analytics companies • Other third parties (including government agencies) as required by law or in connection with court proceedings (such as pursuant to subpoenas or court orders) • Third parties who may acquire your information as a result of a merger, acquisition or other ownership transition • Third parties when you agree to or request that we share your information with them

		protect the Site, ourselves, and our users	
Characteristics of protected classifications	<p>We may collect this type of information from these sources as detailed in Information We Collect:</p> <ul style="list-style-type: none"> • Job Applicant 	<p>We may use this type of information as detailed in How We Use Information:</p> <ul style="list-style-type: none"> • To consider your job application. 	<p>We may disclose this type of information to as detailed in How We Use Information and How We Share Information:</p> <ul style="list-style-type: none"> • Service Providers, such as third parties who deliver our communications • Other third parties (including government agencies) as required by law or in connection with court proceedings (such as pursuant to subpoenas or court orders) • Third parties who may acquire your information as a result of a merger, acquisition or other ownership transition • Third parties when you agree to or request that we share your information with them
Commercial information	<p>We may collect this type of information from these sources as detailed in Information We Collect:</p> <ul style="list-style-type: none"> • Consumers • Third Party Service Providers • Third Party Business Partners 	<p>We may use this type of information as detailed in How We Use Information:</p> <ul style="list-style-type: none"> • To fulfill your request, process your payment, deliver your orders, communicate with you, and provide customer service • To maintain your account • If you are a Professional User or CareerPaths Partner, to establish and manage our relationship and assist with a transaction • To use Submissions and Professional Content as set forth in the applicable Terms of Service • To contact you about administrative matters • To conduct and administer sweepstakes, contests, or promotions • To understand your preferences and provide improved services • To tailor the content and advertising we display on our Site and elsewhere • To analyze Site traffic and interaction • To create advertising models • To consider your job application • For internal business purposes, such as to comply with legal requirements and business policies and/or to protect the Site, ourselves, and our users 	<p>We may disclose this type of information to as detailed in How We Use Information and How We Share Information:</p> <ul style="list-style-type: none"> • Service Providers, such as third parties who deliver our communications • Third parties we partner with for contests, sweepstakes, or promotions • Third party advertising and analytics companies • Other third parties (including government agencies) as required by law or in connection with court proceedings (such as pursuant to subpoenas or court orders) • Third parties who may acquire your information as a result of a merger, acquisition or other ownership transition • Third parties when you agree to or request that we share your information with them

Professional or employment-related information	<p>We may collect this type of information from these sources as detailed in Information We Collect:</p> <ul style="list-style-type: none"> • Job Applicant 	<p>We may use this type of information as detailed in How We Use Information:</p> <ul style="list-style-type: none"> • To consider your job application. 	<p>We may disclose this type of information as detailed in How We Use Information and How We Share Information:</p> <ul style="list-style-type: none"> • Service Providers, such as third parties who deliver our communications • Other third parties (including government agencies) as required by law or in connection with court proceedings (such as pursuant to subpoenas or court orders) • Third parties who may acquire your information as a result of a merger, acquisition or other ownership transition • Third parties when you agree to or request that we share your information with them
Internet or other electronic network activity information	<p>We may collect this type of information from these sources as detailed in Information We Collect:</p> <ul style="list-style-type: none"> • Consumers • Cookies and Tracking Technologies • Third Party Service Providers • Third Party Social Media Companies • Third party Business Partners • Third Party Data Resellers 	<p>We may use this type of information for:</p> <ul style="list-style-type: none"> • To better understand your preferences and provide improved services • To tailor the content and advertising we display to you on our Site and elsewhere • To compile and analyze statistics about Site traffic and interaction • To create advertising models • For internal business purposes, such as to comply with legal requirements and business policies and/or to protect the Site, ourselves, and our users 	<p>We may disclose this type of information to:</p> <ul style="list-style-type: none"> • Service Providers • Third party advertising and analytics companies • Other third parties (including government agencies) as required by law or in connection with court proceedings (such as pursuant to subpoenas or court orders) • Third parties who may acquire your information as a result of a merger, acquisition or other ownership transition • Third parties when you agree to or request that we share your information with them
Inferences drawn from any of the information identified above to create a profile about a consumer	<p>We may collect this type of information from these sources as detailed in Information We Collect:</p> <ul style="list-style-type: none"> • Consumers • Cookies and Tracking Technologies • Third Party Service Providers • Third Party Social Media Companies • Third party Business Partners • Third Party Data Resellers 	<p>We may use this type of information for:</p> <ul style="list-style-type: none"> • To better understand your preferences and provide improved services • To tailor the content and advertising we display to you on our Site and elsewhere • To compile and analyze statistics about Site traffic and interaction • To create advertising models • For internal business purposes, such as to comply with legal requirements and business policies and/or to protect the Site, ourselves, and our users 	<p>We may disclose this type of information to:</p> <ul style="list-style-type: none"> • Service Providers • Third party advertising and analytics companies • Other third parties (including government agencies) as required by law or in connection with court proceedings (such as pursuant to subpoenas or court orders) • Third parties who may acquire your information as a result of a merger, acquisition or other ownership transition • Third parties when you agree to or request that we share your information with them

Response Timing. We typically process: an access or deletion request within 45 days from the day we receive it (and will notify you within that period if we need more time)

Request to Know/Access or Request to Delete.

Making A Request. If you are a UK resident and would like to request information about the Personal Information we have collected about you over the last 12 months or to request that we delete your information, you (or an authorized agent) may submit your request, along with the first and last name of the subject of the request, the email address used to interact with CareerPaths, and confirmation that the subject is a UK resident by sending an email to dataprotection@CareerPaths.io

Verifying A Request. We will use the information you provide to verify your request and may request additional information if needed. If we are unable to verify that the individual submitting the request is the same individual about whom we have collected information (or someone authorized by that individual to act on their behalf), we will not be able to process the request.

Other Important Information.

Request to Know/Access. You (or an authorized agent) must provide us with enough information to verify your identity. If we are unable to verify that you are the subject of the request (or an authorized agent), we will not provide the information requested.

Request to Delete. In addition, if you have a Site account, you may submit your request through the account services portal on CareerPaths.io or in the mobile application. You may also delete certain Personal Information you have provided to us through your online account (if you have one).

Right to Opt-Out of Sale of Personal Information. CareerPaths does not sell your Personal Information for monetary or other direct compensation; however, CareerPaths does engage in online advertising practices (and certain analytics or similar activities) that might be considered "sales". Please see the other third-party opt-out mechanisms described in Your Choices. Note that these are cookie-based opt-outs. If, after opting out, you disable cookies, upgrade your browser, or use a different device or browser, you will need to indicate your opt-out choices for each device or browser. You may be able to opt-out from interest-based advertising on a mobile device through the device settings. You may also be able to limit the access these third-party advertising companies have to information about you when you use our Site by installing a browser or browser extension that can enable you to block the functionality of some tracking technologies. Please be aware that utilizing these mechanisms does not opt you out of being served advertising. You will continue to receive generic ads while online.

Users Younger than 16. CareerPaths does not knowingly sell Personal Information of minors younger than 16 years of age.

For More Information. See Contact Us.

10. Notice to UK And EEA Users

For privacy-related information applicable to people located in the UK or EEA:

CareerPaths is the data controller for the purposes of the General Data Protection Regulation (EU) 2016/679 ("GDPR"); and "personal information" as used in this Privacy Policy is "personal data," as defined in Article 4(1) of the GDPR. In some circumstances, Career Tech Ltd ("CareerPaths UK") is also a data controller. This will be the case if you: apply for a job with CareerPaths UK; discuss participating or participate on the Site as a Professional User via CareerPaths UK (or via a CareerPaths Partner that CareerPaths UK uses); and become a CareerPaths Partner via CareerPaths UK.

If you have any questions about how we (or CareerPaths UK) use your personal data, or to exercise your data protection rights please contact us; see Contact Us.

Where you discuss participating on the Site as a Professional User via a CareerPaths Partner used by CareerPaths UK, that CareerPaths Partner is also a data controller. Please review its privacy policy carefully. You should contact it directly about how it uses your personal data or to exercise your data protection rights in respect of them.

The scope of this notice applies to use of your personal information by CareerPaths and CareerPaths UK, whether through the Site or otherwise. We (and CareerPaths UK) process your information for the purposes set out below.

More information about CareerPaths UK can be found [here](#).

(a) Legal Basis for Processing Information

CareerPaths and CareerPaths UK process your information where there is a legal ground to do so, as described below in Sections 12.a(i) through 12.a(iv).

Performance of the Services. We process your information for the performance of our Site, to provide or support our products and services, or for any other reason you request or enable. This includes, for example, using your information to:

- administer your Site account;

- facilitate your participation on the Site as a Professional User, or prospective Professional User (which includes sending your information to the United States);

- facilitate your role as a CareerPaths Partner;

- conduct and administer any sweepstakes, contest, or promotion you have entered;

- support purchases you make, including, but not limited to, processing payments and orders;

- support Site functionality;

maintain our Site in accordance with this Privacy Policy and the applicable Terms of Service;
provide customer service; and

if you are a Professional User of our Site, to assist you in connection with your participation in our platform, offering and providing CareerPaths Meetings and other offerings, and in connection with payments from our third-party payment provider, as specified in the Terms of Service.

Consent. We process your information based on your consent where consent is the lawful basis for such processing. This processing includes CareerPaths providing you with:

newsletters, direct e-mails and surveys about our Site; and

certain other marketing features.

Where CareerPaths relies on your consent as the lawful basis for processing your personal information, you have the right to withdraw your consent to further use of your personal information at any time. You can use the methods described in the Accessing Personal Information and Retention Period to update your marketing preferences.

Legitimate Interest. To process your information when CareerPaths or CareerPaths UK has a legitimate interest to do so. This includes, for example, processing your information to:

provide you with requested customer service or technical support;

debug and improve the current and future Site;

provide you with certain content, personalize your Site experience with us and contact you in accordance with your applicable marketing preferences;

monitor activity on the Site to prevent or detect any fraudulent use of the Site;

prevent or detect any fraudulent payment; and

establish, exercise, or defend legal claims or in connection with any court or jurisdiction.

You may request more information regarding our legitimate interest balancing test where this is our lawful basis by sending an email message to dataprotection@CareerPaths.io with your request and confirmation that you are in the UK or EEA.

Legal Obligation. To process your information for compliance with any legal obligation to which CareerPaths or CareerPaths UK is subject.

(b) Your Rights to Your Information

In addition to your rights to view, correct, and update your information as described in Accessing Personal Information and Retention Period, you may submit a request to access or remove your personal information, by sending an email message dataprotection@CareerPaths.io with your request and confirmation that you are located in the UK or EEA. In addition, if you have a Site account, you may submit a request to remove your personal information through the account services portal on CareerPaths.io or the mobile application.

In certain circumstances, you can request that we transfer personal information that you have provided to us by sending an email message to dataprotection@CareerPaths.io with your request and confirmation that you are located in the UK or EEA.

(c) Your Right to Object

You may object to the processing of your personal information based on a legitimate interest on grounds relating to your circumstances. You may, in particular, control the extent to which CareerPaths markets to you and you have the right to request that we stop sending you marketing messages at any time. To do so, you can use the methods described in Accessing Personal Information and Retention Period.

(d) Exercising Your Rights and Complaints

For each of the rights described above, please contact us; see Contact Us.

Your right to file complaints with a data protection supervisory authority in the country where you live or work or where you consider a breach has occurred remains unaffected.

(e) International Transfers

Your information will be collected, processed, and stored directly on or transferred to servers in the UK. In addition, it may be transferred to other countries where CareerPaths, CareerPaths UK, other CareerPaths affiliates, or third party business partners maintain facilities or business operations, which may include countries outside the UK or EEA. Where we are required by law to implement appropriate safeguards to protect your personal information, we use European Commission-approved contract clauses to do so. If you have questions, please contact us; see Contact Us.

13. Notice to Users Outside the U.S., UK, and EEA

As noted in International Transfers, your information will be collected, processed, and stored directly on or transferred to servers in the UK. and may be transferred other countries where CareerPaths, CareerPaths affiliates or our third party business partners maintain facilities or business operations. Your personal information will be accessible to law enforcement and/or regulatory authorities according to the applicable laws of such countries.

No matter where the information is located, CareerPaths takes commercially reasonable measures to safeguard your privacy rights in accordance with this Privacy Policy. If you do

not agree to the collection, processing, storage and transfer of your information, please do not provide your information to us and stop using our Site.

14. Contact Us

(a) To contact us about this Privacy Policy only:
send an email to dataprotection@CareerPaths.io;

Attention: Data Protection