



February 6, 2026

VIA E-MAIL

GhostMyData.com

legal@ghostmydata.com

RE: Cease and Desist

Dear Sir or Madam,

I am an attorney writing on behalf of ZipRecruiter, Inc. ("ZipRecruiter") in relation to GhostMyData.com's ("GhostMyData") misrepresentation of ZipRecruiter as a data broker.

We are writing to formally demand that you immediately remove ZipRecruiter from your database of "data brokers" and the associated automated notification stream. We have been receiving repeated data removal and opt-out requests from your service that are legally inapplicable to our operations and factually inaccurate.

MISREPRESENTATION OF ZIPRECRUITER AS A DATA BROKER

GhostMyData positions itself as a business that allows consumers to automate data removals from hundreds of data broker sites. The Terms of Use further state that GhostMyData will "scan data broker websites to find your information" and "submit removal requests to data broker sites" on behalf of the consumer. Nonetheless, it charges consumers a fee to be able to protect their privacy.

Your service appears to have erroneously classified ZipRecruiter as a "data broker", as we recently began receiving data broker removal and deletion notices from your services. We fundamentally dispute your classification of ZipRecruiter as a data broker.

In California, USA, where ZipRecruiter is headquartered, a "data broker" is defined as a business that knowingly collects and sells to third parties the personal information of a



3000 Ocean Park Blvd., #3000, Santa Monica, California 90405

consumer with whom the business *does not have a direct relationship*.¹ A similar definition applies under other U.S. privacy laws, including in Oregon,² Texas,³ and Vermont.⁴

Our organization does not meet the statutory definition of a data broker under any current U.S. state privacy and data protection laws. With each of our customers and users, ZipRecruiter has a direct relationship with these individuals through one or more of the following: (a) providing their personal data directly to ZipRecruiter, (b) being direct users of our website and services, and/or (c) creating accounts directly on our website.

Moreover, as it relates to the GhostMyData requests we've received to date, we did not hold or process any personal data or account information for any of the individuals identified in those automated emails.

Your continued transmission of these automated requests is based on materially false information regarding our business practices, and constitutes a disruption to our business operations.

DECEPTIVE TRADE PRACTICES

GhostMyData charges consumers a premium (approx. \$11.99 - \$29.99/month) to remove their data from data brokers. GhostMyData's business model relies on the volume of data brokers they can claim to target. By listing ZipRecruiter as part of its library of data brokers, GhostMyData inflates its value proposition ("We find and remove your data from hundreds of sites").

ZipRecruiter offers the removal of personal data for free, with no cost to our users and with minimal effort required on the part of the consumer to initiate the request. Our users can directly delete their accounts, or reach out by email to our Data Subject Request Handling Team to initiate the deletion process, each as outlined in our Global Privacy Policy.

¹ See Cal. Civ. Code § 1798.99.80(d).

² In Oregon, the term "data broker" means "a business entity or part of a business entity that collects and sells or licenses brokered personal data to another person". "Data broker" does not include "a business entity that collects information about a resident individual if the resident individual is or was: (I) a customer, subscriber or user of the business entity's goods or services; (II) an employee or agent of the business entity or is in a contractual relationship with the business entity." ORS 646A.593(c).

³ In Texas, the term "data broker" means "a business entity that collects, processes, or transfers personal data that the business entity did not collect directly from the individual linked or linkable to the data." See Tex. Bus. & Com. Code § 510.001(4).

⁴ In Vermont, the term "data broker" means "a business, or unit or units of a business, separately or together, that knowingly collects and sells or licenses to third parties the brokered personal information of a consumer with whom the business does not have a direct relationship." 9 V.S.A. § 2430(4)



This practice by GhostMyData constitutes a deceptive trade practice. By telling consumers that GhostMyData will remove their personal data from ZipRecruiter for a fee, you are implying that the consumer cannot easily do this themselves, which is false.

Moreover, these emails come directly from GhostMyData's email domain ("GhostMyData <noreply@send.ghostmydata.com>"), are not from the consumer, and in no way meet the standards of what is required of an authorized agent under applicable privacy law.

ZIPRECRUITER'S DEMAND

Notwithstanding the fact that the misrepresentation and deceptive trade practices are damaging our brand and operations, we prefer to resolve this dispute amicably and we hereby demand that you immediately take the following steps:

1. Immediately remove all references to "ZipRecruiter" from your "data broker" and any and all similar lists;
2. Cease and desist sending automated data broker removal/deletion requests to our email addresses immediately;
3. Update your records to reflect that ZipRecruiter is not a data broker; and
4. Provide us with written assurances that you have taken the above actions.

If you comply with these demands, we will consider this matter resolved. Please respond with the requested written certification of your compliance and acceptance of these terms within **10 business days** (i.e., by February 23, 2026). If we do not receive a satisfactory response by that time, we will have no choice but to consider other appropriate remedies to pursue. ZipRecruiter reserves all of its rights, none of which are waived by this letter.

Sincerely,

Crystal Skelton

Crystal Skelton
VP, Corporate Counsel
crystal.skelton@ziprecruiter.com

