

Effective Date: May 10, 2018

Note: This document is only available in English, as it's the official language of commerce for our clients (B2B) and in the regions we operate. Any translated copies are not valid.

This Privacy Policy applies to the Emplow owned and operated websites and its subdomains ("Sites"). Emplow (Emplow," "we," or "us") knows that you care how information about you is used and shared. This Privacy Policy explains what information of yours will be collected by Emplow when you access the Sites and Emplow Service (including through the websites of our partners), how the information will be used, and how you can control the collection, correction and/or deletion of information. We will not use or share your information with anyone except as described in this Privacy Policy. This Privacy Policy does not apply to information we collect by other means (including offline) or from other sources. Capitalized terms that are not defined in this Privacy Policy have the meaning given them in our [Terms](#). The use of information collected through our Sites shall be limited to the purposes under this Privacy Policy and our Terms of Service to customers.

1. Information We Collect on Our Own Behalf.

(a) Our Service: We may collect personally identifiable information about you, such as your full name, phone number, email address, or similar, when you register for an account. If you choose to purchase a product from us, we or our third-party payment processors will collect your payment information. When you use the Emplow Service or if you visit our websites, we may receive certain information about you as described below. We do not send any promotional emails; however, we may send you service related emails related to your account. If you no longer wish to receive these emails, you may opt out of them by canceling your account.

(b) Cookies And Tracking Technologies: Technologies such as: cookies, beacons, tags and scripts are used by Emplow. These technologies may be used in analyzing trends, administering the Sites, tracking your movements around the Sites and to gather demographic information about our user base as a whole. We use cookies to remember users' settings as well as for authentication and analytics. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our Sites, but your ability to use some features or areas of our Sites may be limited. This website uses Emplow, an analytics tool by Emplow (Flaesketorvet 68, 1711 Copenhagen V, Denmark), to track user activity, page content, click/touch, movement, scroll, and keystroke activity (in some cases). If you are located in Europe, your IP address, keystroke activity, and personal information are never stored or shared with any third-parties. We process and keep all data for our own website within Europe and, if you wish to opt-out from tracking by Emplow, you can do so at <https://Emplow.com/opt-out/>. You can also learn more about the [Emplow Cookie Policy](#). We also use Google Analytics, Google Tag Manager, Google AdWords (Conversion Tracking), LinkedIn (Conversion Tracking), Share-a-Sale (Conversion Tracking), Yahoo (Conversion Tracking), and Quora (Conversion Tracking). Some or all of these tools may be used to track information about your behavior on our website depending on your region. For more information or to opt-out, please visit the respective website(s) of these vendors or contact us at info@emplow.org.

Information We Collect on Behalf of Our Customers.

(a) Our Service. We collect data on behalf of our customers who use the Employ Service (by embedding our code on their websites) on the behavior of visitors of our customers' websites or mobile applications. When you visit such websites or mobile applications, we may receive certain information about your behavior including user activity, page content, click/touch, movement, scroll, and keystroke activity (in some cases). If you are located in Europe, your IP address, keystroke activity, and personal information are never stored or shared with any third-parties.

(b) Information Related To Data Collected For Our Customers: Employ collects information under the direction of its customers, and has no direct relationship with the individuals whose data it may process. If you are a client of one of our current customers and would no longer like to be tracked by such customer, please contact the respective customer directly. We may transfer personal information to companies that help us provide our service. Transfers to subsequent third parties are covered by the service agreements with our customers.

(c) Access And Retention Of Data Controlled By Our Customers: An individual who is a current or former Employ customer who seeks access or wishes to correct, amend or delete inaccurate data should direct his query to info@employ.org. An individual who is a client of a current or former Employ customer who seeks access or wishes to correct, amend or delete inaccurate data should direct his query to the respective customer first and then, if no response is obtained or such response is not satisfactory, should contact info@employ.org. If we receive a request under this provision, we will acknowledge it within seventy-two (72) business hours and handle it promptly.

We will retain personal data we process on behalf of our customers for as long as needed to provide our services. Employ will retain this personal information as necessary to comply with our legal obligations, resolve disputes and enforce our agreements.

Information We Collect on Behalf of Third Parties.

Cookies And Tracking Technologies: Technologies such as: cookies, beacons, tags and scripts are used by our partners, affiliates, analytics or service providers. These technologies may be used in analyzing trends, administering the Sites, tracking your movements around the Sites and to gather demographic information about our userbase as a whole. We may receive reports based on the use of these technologies by such companies on an individual as well as aggregated basis.

2. How We Use Your Information.

(a) We use the information that we collect to operate and maintain our Sites and the Employ Service and to respond to your questions and concerns. The legal basis is section 6(1) of the Danish Data Protection Act and art. 6(1)(f) of the EU General Data Protection Regulation (GDPR).

(b) If you have given your consent, we use the information that we collect to send you marketing communications in our newsletter. The legal basis is section 6(1) of the Danish Data Protection Act and art. 6(1)(a) of GDPR.

(c) We also use the information that we collect to help our customers improve their website(s).

3. How We Share Your Information.

(a) Personally Identifiable Information: Emplov will not rent or sell your personally identifiable information to others. We may store personal information in locations outside the direct control of Emplov (for instance, on servers or databases co-located with hosting providers). Any personally identifiable information you elect to make publicly available on our Sites or the Emplov Service, such as posting comments on our blog page, will be available to others. If you remove information that you have made public on our Sites or the Emplov Service, copies may remain viewable in cached and archived pages of our Sites or the Emplov Service, or if other users have copied or saved that information. Our blog is managed by a third party application that may require you to register to post a comment. We do not have access or control of the information posted to the blog. You will need to contact or login into the third party application if you want the personal information that was posted to the comments section removed. To learn how the third party application uses your information, please review their privacy policy.

(b) Non-Personally Identifiable Information: We may share non-personally identifiable information (such as anonymous usage data, referring/exit pages and URLs, platform types, number of clicks, etc.) with interested third parties to help them understand the usage patterns for certain Emplov Services and those of our partners. Our partners also have the option to publish the results for their websites on the Emplov Service. Such results consist solely of non-personally identifiable information. If you choose to publish such results on the Emplov Service or Site (for example, in our results gallery), you understand and agree that this information, along with any personally identifiable information you choose to make available in connection with such results, will be made publicly available. By publishing your results on the Emplov Service or Site, you agree that you have obtained all necessary consents to make such information public and that doing so will not violate any laws. If you remove information that you have made public on the Emplov Service or Site, copies may remain viewable in cached and archived pages of the Emplov Service or Site, or if other users have copied or saved that information. Non-personally identifiable information may be stored indefinitely.

(c) Instances Where We Are Required To Share Your Information: Emplov will disclose your information where required to do so by law, if subject to subpoena or other legal proceeding or if we reasonably believe that such action is necessary to (a) comply with the law and the reasonable requests of law enforcement; (b) to enforce our Terms of Service or to protect the security or integrity of our Service; and/or (c) to exercise or protect the rights, property, or personal safety of Emplov, our users or others.

(d) What Happens In The Event Of A Change Of Control: We may buy or sell/divest/transfer the company (including any shares in the company), or any combination of its products, services, assets and/or businesses. Your information such as customer names and email addresses, and other User information related to the Emplov Service may be among the items sold or otherwise transferred in these types

of transactions. We may also sell, assign or otherwise transfer such information in the course of corporate divestitures, mergers, acquisitions, bankruptcies, dissolutions, reorganizations, liquidations, similar transactions or proceedings involving all or a portion of the company. You will be notified via email and/or a prominent notice on our Site of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

(f) Testimonials: We display personal testimonials of satisfied customers on our Site in addition to other endorsements. With your consent, we may post your testimonial along with your name. If you wish to update or delete your testimonial, you can contact us at info@emplow.org.

4. **Storage and Processing.** Your information collected through the Emplow Service may be stored and processed in the United States, Europe, or any other country in which Emplow or its subsidiaries, affiliates or service providers maintain facilities. Emplow may transfer information that we collect about you, including personal information, to affiliated entities, or to other third parties across borders and from your country or jurisdiction to other countries or jurisdictions around the world. If you are located in the European Union or European Economic Area, please note that we will not transfer information, including personal data, to a country outside of the European Union or European Economic Area.
5. **How We Protect Your Information.** Emplow is concerned with protecting your privacy and data, but we cannot ensure or warrant the security of any information you transmit to Emplow or guarantee that your information on the Emplow Service may not be accessed, disclosed, altered or destroyed by breach of any of our industry standard physical, technical or managerial safeguards. When you enter sensitive information (such as log in credentials) on our registration or order forms, we encrypt that information using secure socket layer technology (SSL). No method of transmission over the Internet or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security. If you have any questions about security on our Site, you can contact us at info@emplow.org. We use an outside help platform, and a credit card processing company to bill you if you purchase services. These companies do not retain, share, store or use personally identifiable information for any other purposes.
6. **Privacy Shield.** Emplow self-certifies compliance with [EU-US Privacy Shield](#) at the U.S. Department of Commerce. Emplow complies with the EU GDPR framework as set forth by the European Union regarding the collection, use, and retention of personal data from European Union member countries. Emplow has certified that it adheres to the requirements of notice, choice, onward transfer, security, data integrity, access and enforcement.
7. **GDPR.** Please review our [dedicated page](#) to learn more about our approach to GDPR.
8. **Compromise of Personal Information.** In the event that personal information is compromised as a breach of security, Emplow will promptly notify our customers in compliance with applicable law.
9. **Your Choices About Your Information.** For current Emplow customers, you can review, correct, update or delete inaccuracies to the information about you that Emplow keeps on file by logging into your account to update your password and billing information. Alternately (for data subjects tracked by Emplow and former Emplow customers), you can contact us directly at info@emplow.org. We will acknowledge your request within seventy-two (72) hours and handle it promptly. If

you wish to opt-out of being tracked by Emplow's analytics software, you can do so at <https://Emplow.com/opt-out/>. Data protection law gives you a range of rights in connection with our processing of your personal data. In this regard, you have the right to request that we rectify or delete the personal data or restrict the processing of your personal data, if you think they are inaccurate. Furthermore, you have the right to object against the processing based on our legitimate interests as a legal basis. We are required to assess and act on your request. Additionally, you also have the right to data portability if it should become relevant. You have a right to lodge a complaint with your local supervisory authority. The contact information of the Danish Data Protection Agency is: Datatilsynet, Borgergade 28, 5, 1300 København K, Telephone: +45 33193200, Email: dt@datatilsynet.dk. If you have any questions about this Privacy Policy or your rights under data protection law, you can contact our Data Protection Officer: Axel Dreyer, LL.M. , Schürmann Wolschendorf Dreyer Lawyers Uerdinger Straße 62 40474 Düsseldorf, Germany , Phone: +49 (0) 211 41558680 Fax: +49 (0) 211 415586820 Email: dreyer@swd-rechtsanwaelte.de.

10. Enforcement and Dispute Resolution. In compliance with the EU-US and Swiss-US Privacy Shield Principles, Emplow commits to resolve complaints about your privacy and our collection or use of your personal information. EU and Swiss Data Subjects with questions or concerns about the use of their Personal Data should contact us at: info@emplow.org. If your question or concern cannot be satisfied through this process, Emplow has further committed to refer unresolved privacy complaints under the EU-US and Swiss-US Privacy Shield Frameworks to BBB EU Privacy Shield, an independent dispute resolution mechanism operated in the United States by the Council of Better Business Bureaus. If you do not receive timely acknowledgement of your complaint, or if your complaint is not satisfactorily addressed by Emplow, EU and Swiss Individuals and Data Subjects should go to <http://bbb.org/EU-privacy-shield/for-eu-consumers/> for more information or to file a complaint. The services of the BBB EU Privacy Shield will be provided at no cost to you. Finally, as a last resort and in limited situations, EU and Swiss Individuals and Data Subjects may seek redress from the Privacy Shield Panel — a binding arbitration mechanism.

11. Our Retention Of Your Information.

(a) If you have an account with Emplow, we will retain your information for as long as your account is active or as needed to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes and enforce our agreements.

(b) If you are a visitor to the Emplow Sites we will retain your information for as long as necessary but no longer than one (1) year after your last visit to our Sites.

12. Children's Privacy. Protecting the privacy of young children is especially important. For that reason, Emplow does not knowingly collect or solicit personal information from anyone under the age of 13. In the event that we learn that we have collected personal information from a child under age 13, we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under 13, please contact us at info@emplow.org
13. Notification Procedures. It is our policy to provide notifications, whether such notifications are required by law or are for marketing or other business related purposes, to you via email, written or hard copy notice, or through conspicuous posting of such notice on the Service, as determined by Emplow in its sole discretion.

We reserve the right to determine the form and means of providing notifications to you, provided that you may opt out of certain means of notification as described in this Privacy Policy.

14. **Links to Other Web Sites.** We are not responsible for the practices employed by websites or services linked to or from the Emplow Service or Sites, including the information or content contained therein. Please remember that when you use a link to go from the Emplow Service or Sites to another website or service, our Privacy Policy does not apply to third-party websites or services. Your browsing and interaction on any third-party website or service, including those that have a link or advertisement on our website, are subject to that third party's own rules and policies.

Social Media Widgets: Our Site includes social media features, such as the Facebook Like button and other widgets, that run on our Site. These features may collect your IP address and which page you are visiting on our Site, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our Site. Your interactions with these features are governed by the privacy policy of the organization providing it.

15. **Changes to Our Privacy Policy.** All changes to this Privacy Policy are effective when they are posted on this page. When we change the policy in a material manner, we will let you know via email and/or a prominent notice on our Site, prior to the change becoming effective and update the 'effective date' at the top of this page.

If you have any questions about this Privacy Policy, the practices of this Site, or your dealings with this website, please contact us at info@emplow.org, or send mail to:

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