



# **TALENTBURST GLOBAL PRIVACY POLICY**

Last modified: December 21, 2022

## **1. INTRODUCTION**

TalentBurst, Inc. and its affiliates (“TalentBurst”, “we”, “us”, or “our”) respect your privacy, and we are committed to handling and protecting your personal information responsibly and in compliance with applicable laws. This policy describes the types of information we may collect from you or that you may provide when you visit our website, [www.talentburst.com](http://www.talentburst.com) (the “Website”), or when you download and use the TalentBurst, Inc. mobile app (the “App”), and our practices for collecting, using, maintaining, protecting, and disclosing that information. This Global Privacy Policy is the exclusive source of our specific privacy practices relating to our Website and App.

This policy applies to information we collect

- on this Website or through our App.
- in email, text, and other electronic messages between you and this Website or the App.
- through our mobile application.
- when you interact with our advertising and applications on third-party websites and services, if those applications or advertising includes links to this policy.

This policy does not apply to information collected by

- us offline or through any other means, including on any other website operated by the Company or any third party, or
- any third party through any application or content (including advertising) that may link to or be accessible from or on the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website or App. By accessing or using this Website or our App, you agree to this privacy policy. This policy may change from time to time. Your continued use of this Website or our App after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.





## 2. CHILDREN UNDER THE AGE OF 16

Our Website and App are not intended for children under 16 years of age. No one under age 16 may provide any personal information to or on the Website or the App. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on this Website or App or through any of their features, use any of the interactive or public comment features of this Website, or provide any information about yourself to us, including your name, address, telephone number, or email address. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at [privacy@talentburst.com](mailto:privacy@talentburst.com).

California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information. Please see “Your State Privacy Rights” for more information.

## 3. INFORMATION WE COLLECT ABOUT YOU AND HOW WE COLLECT IT

We collect several types of information from and about users of our Website and App, including information

- by which you may be personally identified, such as name, email address, and telephone number (“personal information”).
- that is about you but individually does not identify you, such as current and past company name, professions, positions, and titles.
- other information you may provide to us, such as through our “Contact Us” feature.
- about your internet connection, the equipment you use to access our Website or App, and usage details.

We collect this information

- directly from you when you provide it to us.
- automatically as you navigate through the Website. Information collected automatically may include usage details, IP addresses, and information collected through cookies and other tracking technologies.
- from third parties, for example, our business partners.

### A. Information You Provide to Us

The information we collect on or through our Website and App may include





- information that you provide by filling in forms on our Website or App. This includes information provided at the time of registering to use our Website or App or requesting further services. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem with our Website or App.
- records and copies of your correspondence (including email addresses) if you contact us.
- your responses to surveys that we might ask you to complete for research purposes.
- your search queries on the Website or App.

You also may provide information to be published or displayed (hereinafter, “posted”) on public areas of the Website or App or transmitted to other users of the Website or third parties (collectively, “User Contributions”). Your User Contributions are posted on and transmitted to others at your own risk. Although we limit access to certain pages and/or you may set certain privacy settings for such information by logging into your account profile, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Website or App with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

## **B. Information We Collect Through Automatic Data Collection Technologies**

As you navigate through and interact with our Website or App, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including

- details of your visits to our Website or App, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website or App.
- information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically is only statistical data and does not include personal information. It helps us to improve our Website and App and to deliver a better and more personalized service, including by enabling us to

- estimate our audience size and usage patterns.
- store information about your preferences, allowing us to customize our Website and App according to your individual interests.
- speed up your searches.





- recognize you when you return to our Website or App.

The technologies we use for this automatic data collection may include:

- Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, you may be unable to access certain parts of our Website or App. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website or App.
- Web Beacons. Pages of our Website, our App, and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

For more information, see the “Choices About How We Use and Disclose Your Information” section.

#### 4. HOW WE USE YOUR INFORMATION

We use information that we collect about you or that you provide to us, including any personal information

- to present our Website and App and their contents to you.
- to provide you with information, products, or services that you request from us.
- to fulfill any other purpose for which you provide it.
- to notify you about changes to our Website or App or any products or services we offer or provide through it.
- to allow you to participate in interactive features on our Website or App.
- in any other way we may describe when you provide the information.
- for any other purpose with your consent.

For more information, see the “Choices About How We Use and Disclose Your Information” section.





## 5. DISCLOSURE OF YOUR INFORMATION

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or that you provide as described in this privacy policy

- to our subsidiaries and affiliates.
- to contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of TalentBurst's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by TalentBurst about our Website users is among the assets transferred.
- to fulfill the purpose for which you provide it.
- for any other purpose disclosed by us when you provide the information.
- with your consent.

We may also disclose your personal information

- to comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of TalentBurst, our customers, or others.

## 6. CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information.

- Tracking Technologies and Advertising. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.





We do not control third parties' collection or use of your information to serve interest-based advertising. These third parties, however, may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's (<https://thenai.org/opt-out/>).

Residents of certain states, such as California, Colorado, Connecticut, Nevada, Utah, and Virginia may have additional personal information rights and choices. Please see "Your State Privacy Rights" for more information.

## 7. YOUR STATE PRIVACY RIGHTS

State consumer privacy laws may provide their residents with additional rights regarding our use of their personal information. To learn more about California residents' privacy rights, please review the following separate notices:

- TalentBurst's Privacy Notice for California Residents
- TalentBurst's California Employee and Job Applicant Privacy Notice Regarding the Collection of Personal Information
- TalentBurst's California Independent Contractor Privacy Notice Regarding the Collection of Personal Information

These policies may be found at [www.talentburst.com](http://www.talentburst.com).

California's "Shine the Light" law (Civil Code Section § 1798.83) permits California residents to request certain information regarding our disclosure of their information to third parties for the third parties' direct marketing purposes. To make such a request, please send an email to [privacy@talentburst.com](mailto:privacy@talentburst.com) or write us at Attention: General Counsel, 679 Worcester Street, Natick, MA 01760.

Colorado, Connecticut, Utah, and Virginia each provide their state residents with rights to

- confirm whether we process their personal information.
- access and delete certain personal information.
- data portability.
- opt-out of personal data processing for targeted advertising and sales.

Colorado, Connecticut, and Virginia also provide their state residents with rights to





- correct inaccuracies in their personal information, taking into account the information's nature processing purpose.
- opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects.

To exercise any of these rights please, please send an email to [privacy@talentburst.com](mailto:privacy@talentburst.com) or write us at Attention: General Counsel, 679 Worcester Street, Natick, MA 01760. To appeal a decision regarding a consumer rights request, please send an email to [privacy@talentburst.com](mailto:privacy@talentburst.com) or write us at Attention: General Counsel, 679 Worcester Street, Natick, MA 01760. A member of TalentBurst's compliance department will respond in writing to the appeal within 30 days, disclosing the outcome of the appeal and the explanation for the decision. If there are any concerns regarding the results of an appeal, you may contact your State Attorney General.

Nevada residents who wish to exercise their sale opt-out rights may submit a request by contacting TalentBurst at [privacy@talentburst.com](mailto:privacy@talentburst.com) or by calling (508) 628-7500. However, please know we do not currently sell data triggering that statute's opt-out requirements.

## 8. DATA SECURITY

TalentBurst has have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, online portal, or App, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website or App. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

## 9. REQUEST TO DELETE / RIGHT TO BE FORGOTTEN

If you would like to submit a "request to delete", "request to be forgotten", or have a question regarding what personal information has been collected, please send an email to





privacy@talentburst.com. We will confirm receipt of your request within 10 calendar days, and we will respond to your inquiry within 45 calendar days of our receipt of your email. TalentBurst will log any requests received. Please note that there are exceptions that allow a business not to delete information in certain situations. Those include when the information is necessary to

- complete a transaction.
- provide a good or service the consumer has requested.
- perform a contract.
- detect security incidents.
- protect against malicious, deceptive, fraudulent, or illegal activities.
- prosecute people responsible for malicious, deceptive, fraudulent, or illegal activities.
- debug to identify and repair errors that impair existing intended functionality.
- ensure the exercise of free speech.
- ensure the Company can exercise another right provided for by law.
- comply with a legal obligation.

TalentBurst will make you aware of whether any of these exceptions exist and what information will be held in our response to you.

## **10. INTERNATIONAL AND US DATA TRANSFERS**

Your personal information may be transferred outside the European Union to locations in the U.S. and other countries that have different data protection laws than those in the country in which you are based and that may not have been granted an adequacy decision by the European Commission. TalentBurst has executed Standard Contractual Clauses approved by the European Union to ensure that your personal data is protected when transferred outside of the European Union. You may request to consult a copy of these Standard Contractual Clauses by contacting us.

TalentBurst complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States and certifies that it adheres to the Privacy Shield Principles. The Privacy Shield Principles will govern if there is a conflict between the terms of this privacy policy and the Privacy Shield Principles. To learn more about the Privacy Shield program, please visit <https://www.privacyshield.gov>.







If you are using the Website or App from outside the United States, you understand and agree that your information and data may be transferred, stored, and used in the United States where our servers are located.

## **11. DO NOT SELL NOTICE**

Please be advised that TalentBurst does not and has not sold any personal information in the last 12 months. Likewise, we do not have any future plans to sell personal information. However, we respect your privacy and understand that you will want to ensure your personal information is not sold. Any questions regarding our practices or to request that your personal information not be sold can always be sent to [privacy@talentburst.com](mailto:privacy@talentburst.com).

## **12. CHANGES TO OUR PRIVACY POLICY**

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will notify you by a notice on the Website home page. The date the privacy policy was last revised is identified at the bottom of each page of this policy. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website at [www.talentburst.com/privacy-policy](http://www.talentburst.com/privacy-policy) and this privacy policy to check for any changes.

## **13. CONTACT INFORMATION**

To ask questions or comment about this privacy policy and our privacy practices, contact us at

TalentBurst, Inc.  
Attention: General Counsel  
679 Worcester Street  
Natick, MA 01760  
[privacy@talentburst.com](mailto:privacy@talentburst.com)  
(508) 628-7500

We will investigate any complaints received and do our best to resolve them with you as soon as possible. You may also submit a user access request to obtain any of your personal data, which will be processed within 30 calendar days.





#### 14. COMPLAINTS AND DISPUTE RESOLUTION

In compliance with Privacy Shield Principles, TalentBurst commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact TalentBurst.

TalentBurst has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) with regarding to unresolved Privacy Shield complaints concerning human resources data transferred from the EU in the context of the employment relationship.

For other complaints or concerns regarding your personal data under this Privacy Policy, please contact us at [privacy@talentburst.com](mailto:privacy@talentburst.com). We will respond to you within 30 calendar days.

