



TALENTBURST PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

Last modified: December 21, 2022

1. INTRODUCTION

This Privacy Notice for California Residents (“Privacy Notice”) supplements the information contained in TalentBurst’s Global Privacy Policy (www.talentburst.com and www.talentburst.com/privacy-policy collectively and individually referred to as our “Website” and the TalentBurst, Inc. mobile application referred to as our “App”) and applies solely to all visitors, users, and others who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and any terms defined in the CCPA have the same meaning when used in this Privacy Notice.

This Privacy Notice does not apply to workforce-related personal information collected from California-based employees, job applicants, contractors, or similar individuals. See TalentBurst’s Employee and Job Applicant Privacy Notice for more details on data for these individuals.

2. INFORMATION WE COLLECT

We collect information through our Website and App that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device (“personal information”). We do not collect sensitive personal information on our Website or through our App. Personal information does not include

- publicly available information from government records.
- deidentified or aggregated consumer information.
- information excluded from the CCPA's scope, such as health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”) and the California Confidentiality of Medical Information Act (“CMIA”), clinical trial data, or other qualifying research data, or personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (“FCRA”), the Gramm-Leach-Bliley Act (“GLBA”), the California Financial Information Privacy Act (“FIPA”), and the Driver's Privacy Protection Act of 1994.





The below table identifies the types of personal information that TalentBurst collects through our Website and App, as well as, for each category, our expected retention period and whether we sell the information or share it with third parties.

Personal Information Category	Expected Retention Period	Business Purpose	Sold or Shared
<p>Identifiers</p> <p>Examples: Name, alias, postal address, unique personal identifier, online identifier, IP address, email address, account name, SSN, driver's license number, passport number, or other similar identifiers</p>	<p>7 years or until the individual opts out or deletion request received</p>	<p>TalentBurst collects identifies to respond to your questions or inquiries on our Website or through our App. For example, if you email us about an open position, we will use your name and email address to respond to your question.</p>	<p>Not sold.</p> <p>May be shared to our service providers to the extent necessary for the provision of services on our behalf.</p>
<p>California Customer Records personal information</p> <p>Examples: Name, signature, SSN, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, education, employment, employment history, medical information, or health insurance information.</p> <p>Some personal information included in this category may overlap with other categories.</p>	<p>7 years or until the individual opts out or deletion request received</p>	<p>TalentBurst collects identifies to respond to your questions or inquiries on our Website or through our App. For example, if you email us about an open position, we will use your name and email address to respond to your question.</p>	<p>Not sold.</p> <p>May be shared to our service providers to the extent necessary for the provision of services on our behalf.</p>





Protected classification characteristics under California or federal law. Examples: Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	Not collected	Not collected	Not collected
Commercial information Examples: Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Not collected	Not collected	Not collected
Biometric information Examples: Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical	Not collected	Not collected	Not collected





patterns, and sleep, health, or exercise data.			
<p>Internet or other similar network activity</p> <p>Examples: Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.</p>	7 years or until the individual opts out or deletion request received	TalentBurst collects interaction data with the Website / App and software to properly track usage, document acknowledgements or consents, and monitor usage.	<p>Not sold.</p> <p>May be shared to our service providers to the extent necessary for the provision of services on our behalf.</p>
<p>Geolocation data</p> <p>Examples: Physical location or movement</p>	Not collected	Not collected	Not collected
<p>Sensory data</p> <p>Examples: Audio, electronic, visual, thermal, olfactory, or similar information.</p>	Not collected	Not collected	Not collected
<p>Professional or employment-related information</p> <p>Examples: Current or past job history or performance evaluations.</p>	Not collected	Not collected	Not collected
<p>Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. § 1232g, 34 C.F.R. Part 99)).</p> <p>Examples:</p>	Not collected	Not collected	Not collected





Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records			
Inferences drawn from other personal information Examples: Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	Not collected	Not collected	Not collected

Our Website and App obtain the categories of personal information listed above from the following categories of sources:

- Directly from you, such as when you complete forms.
- Indirectly from you, such as from observing your actions on our Website or in our App.

3. USE OF PERSONAL INFORMATION

We may use or disclose the personal information we collect for one or more of the following purposes:

- Fulfill or meet the reason you provided the information. For example, if you share your name and contact information to inquire about an advertised position, we will use that personal information to respond to your inquiry. We may also save your information to facilitate new position advertisements or updates.
- Provide, support, personalize, and develop our Website, App, products, and services.
- Provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- Help maintain the safety, security, and integrity of our Website, App, products and services, databases and other technology assets, and business.





- For testing, research, analysis, and product development, including to develop and improve our Website, App, products, and services.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- Evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our Website or App users is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

4. SHARING PERSONAL INFORMATION

We may share your personal information by disclosing it to a third party for a business purpose. We only make these business purpose disclosures under written contracts that describe the purposes, require the recipient to keep the personal information confidential, and prohibit using the disclosed information for any purpose except performing the contract.

In the preceding 12 months, TalentBurst has not disclosed personal information for a business purpose.

In the preceding 12 months, TalentBurst has not sold personal information.

5. YOUR RIGHTS AND CHOICES

The CCPA provides California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

A. Right to Know and Data Portability

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months (the "Right to Know"). Once we receive your request and confirm your identity (*see* Exercising Your Rights to Know or Delete), we will disclose to you

- the categories of personal information we collected about you.
- the categories of sources for the personal information we collected about you.
- our business or commercial purpose for collecting or selling that personal information.
- the categories of third parties with whom we share that personal information.





- the specific pieces of personal information we collected about you (also called a data portability request).

PLEASE NOTE THAT TALENTBURST DOES NOT ENGAGE IN THE SALE OF PERSONAL INFORMATION.

B. Right to Delete

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions (the "Right to Delete"). Once we receive your request and confirm your identity (*see* Exercising Your Rights to Know or Delete), we will review your request to see if an exception applies that allows us to retain the applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to

1. complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
2. detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise his or her free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.





We will delete or deidentify personal information not subject to one of these exceptions from our records and will direct our service providers to take similar action.

C. Exercising Your Rights to Know or Delete

To exercise your Rights to Know or Delete described above, please submit a request by either

- calling us at 508-628-7500 and asking for the General Counsel.
- emailing us at privacy@talentburst.com.

Only you, or someone legally authorized to act on your behalf, may make a request to know or delete related to your personal information. You may also make a request on behalf of your minor child.

You may only submit a request to know twice within a 12-month period. Your request to know or delete must

- provide sufficient information that allows us to reasonably verify that you are the person about whom we collected personal information or are an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. You do not need to create an account on the Website or through the App to submit a request to know or delete.

D. Response Timing and Format

We will confirm receipt of your request within 10 business days. If you do not receive such confirmation, please contact legal@talentburst.com. We endeavor to substantively respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to another 45 days, totaling 90), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding our receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your





personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

E. Personal Information Sales Opt-Out and Opt-In Rights

If you are age 16 or older, you have the right to direct us to not sell your personal information at any time (the "Right to Opt-Out"). We do not sell the personal information of consumers we know are less than 16 years old. Consumers who opt-in to personal information sales may opt-out of future sales at any time.

PLEASE NOTE THAT TALENTBURST DOES NOT ENGAGE IN THE SALE OF PERSONAL INFORMATION.

6. NON-DISCRIMINATION

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not

- deny you goods or services.
- charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- provide you with a different level or quality of goods or services.
- suggest that you may receive a different price or rate for goods or services or a different level of quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that **can result** in different prices, rates, or quality levels.

7. OTHER CALIFORNIA PRIVACY RIGHTS

California's "Shine the Light" law (Civil Code § 1798.83) permits users of our Website or App that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to privacy@talentburst.com.





8. CHANGES TO OUR PRIVACY POLICY

We reserve the right to amend this Privacy Notice at our discretion and at any time. When we make changes to this Privacy Notice, we will post the updated notice on the Website and update the notice's effective date. **Your continued use of our Website or App following the posting of changes constitutes your acceptance of such changes.**

9. CONTACT INFORMATION

If you have any questions or comments about this Privacy Notice, the ways in which TalentBurst collects and uses your information described here and in the TalentBurst Global Privacy Policy, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at

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

