# **California Privacy Notice**

Effective Date: January 1, 2020 Last Updated: July 1, 2020

Your privacy is important to us and maintaining your trust is our priority. The jobboard.io website is owned and operated by ZipRecruiter, Inc. ("ZipRecruiter," "we," "our," or "us"). ZipRecruiter respects your privacy and is committed to protecting it through our compliance with this California Privacy Notice ("Privacy Notice").

This Privacy Notice supplements the information contained in the <u>Privacy Policy</u> and applies solely to visitors, users, and others who reside in the State of California ("<u>consumers</u>" or "<u>you</u>") and use our Services. We adopt this Privacy Notice to comply with the California Consumer Privacy Act of 2018 ("<u>CCPA</u>") and any terms defined in the CCPA have the same meaning when used in this notice. Capitalized terms used but not otherwise defined herein or in the CCPA shall have the meanings given to such terms in the Privacy Policy. You can download a PDF version of this Privacy Notice <u>here</u>.

#### 1. Information We Collect

#### A. Personal Information

Our Website collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device ("personal information"). In particular, we have collected the following categories of personal information from consumers via this Website within the last twelve (12) months:

	Category	Examples of Specific Pieces of Personal Information We May Collect
A.	Identifiers	First name, maiden name, last name, alias, physical address, email address, telephone number, username, unique personal identifier, online identifier, Internet Protocol (IP) address, device IDs, account name, and other similar identifiers.
В.	Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, address, telephone number, and, if you are a client, your financial information (including a bank account number, credit card number, debit card number, or any other financial information).  Some personal information included in this category may overlap with other categories.
C.	Commercial information	Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies (such as details about payments to and from you), details regarding the services that you have subscribed to or purchased, and details about your company or organization (such as contact information, EIN, website URL).
D.	Internet or other similar network activity	Login data, access dates and times, browsing history, browser type and version, device information, cookie data, browser plug-in types and versions, operating system and platform and other technology on the devices used to access the Website, and other similar activity concerning an interaction with our Services.

	Category	Examples of Specific Pieces of Personal Information We May Collect
E.	Geolocation data	Time zone setting and approximate location; latitude and longitude.
F.	Inferences drawn from other personal information to create a profile	Inferences used to reflect a consumer's preferences or behavior on our Website.

<u>NOTE</u>: ZipRecruiter has <u>not collected</u> any of the following categories of personal information from consumers within the last twelve (12) months:

- Protected classification characteristics under California or federal law
- Biometric information (such as 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 patterns, and sleep, health, or exercise data)
- Sensory data (such as audio, electronic, visual, thermal, olfactory, or similar information)
- Professional or employment-related information
- Non-public education information, per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)) (such as 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.

#### B. Non-Personal Information

ZipRecruiter collects, uses and shares de-identified and/or aggregated consumer information, which is not considered personal information. Deidentified or aggregated data may be derived from your personal information, but is not considered personal information under CCPA, since it does not directly or indirectly reveal your identity. For example, we may aggregate your Internet or other similar network activity to calculate the percentage of users accessing a specific website feature.

#### C. Sources of Personal Information

We obtain the categories of personal information listed above from the following categories of sources:

- **Directly from you**. For example, when you fill in forms, sign up for a free trial or paid subscription, create an account, or correspond with us by post, phone, e-mail or otherwise.
- **Indirectly from you**. For example, through automated technologies or your interactions with us, including from observing your actions when you use our Website.
- **Third Parties**. We may receive personal information about you from various third parties, such as analytics providers or advertising networks.
- In our capacity as a service provider (see Section 6 below).

### 2. Use of Personal Information

We describe in detail in our <u>Privacy Policy</u> the context in which your personal information may be collected, along with how and why we use your personal information. Pursuant to the CCPA, we may use the personal information we collect for one or more of the following business or commercial purposes:

- To fulfill or meet the reason for which the personal information is provided. For example, if you provide your personal information to create an account, we will use that information to create your account.
- To create, maintain, manage, customize, and/or secure your account with us.
- To communicate with you about your account or our Services, and to manage our relationship with you.
- To provide you with support and to respond to your inquiries, including investigating and address your concerns and monitor and improve our responses.
- To send you marketing communications (where you have asked us to) which may be tailored to your "profile" (*i.e.*, based on the personal information we know about you and your preferences).
- To send you newsletters where you have indicated an interest or shown an interest based on your preferences as shown by your activity on the Website and/or your profile.
- To maintain certain of your information on a suppression list, if you've indicated to us that you
  don't want to be communicated in a particular way.
- To manage any surveys, promotions or competitions you entered.
- To personalize your Website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Website, third-party sites, and via email.
- To enable our Website to function properly (ensure proper display of content), create and remember your account login details, and for interface personalization, such as language, or any user-interface customization.
- To provide, support, personalize, and develop our Services.
- To process your requests, purchases, transactions, and payments, and prevent transactional fraud.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing or collections, or manage payment disputes or issues with the services.
- To help maintain the safety, security, and integrity of our Services, databases and other technology assets, and business.
- To detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity.
- For testing, research, analysis, and product development, including to collect statistics and develop and improve our Website or Services.
- For debugging to identify and repair errors that impair existing intended functionality of our Website or Services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

• In connection with or during negotiations of any proposed or actual financing, merger, purchase, sale, sale or transfer of some or all of our assets or stock, joint venture, or any other type of financing, acquisition or business combination of our company, or all or any portion of our assets, or transfer of all or a portion of our business to another company, including without limitation in the event of a divestiture, restructuring, reorganization, dissolution or other event, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by ZipRecruiter is among the assets transferred.

ZipRecruiter 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.

## 3. Sharing Personal Information

#### A. <u>Disclosures of Personal Information</u>

We describe in detail in our <u>Privacy Policy</u> the context in which your personal information may be disclosed to or shared with a third party. Pursuant to the CCPA, ZipRecruiter has disclosed personal information to the following categories of third parties for a business purpose in the preceding twelve (12) months:

	Category Disclosed for a Business Purpose	Categories of Third Parties
A.	Identifiers	<ul> <li>Companies within our corporate family that comprise the ZipRecruiter Group</li> <li>Data and web analytics providers</li> <li>Vendors and service providers</li> <li>Professional advisors</li> <li>Advertising partners</li> <li>Advertising networks</li> </ul>
В.	Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	<ul> <li>Companies within our corporate family that comprise the ZipRecruiter Group</li> <li>Data and web analytics providers</li> <li>Vendors and service providers</li> <li>Professional advisors</li> </ul>
C.	Commercial information	<ul> <li>Companies within our corporate family that comprise the ZipRecruiter Group</li> <li>Data and web analytics providers</li> <li>Vendors and service providers</li> <li>Professional advisors</li> </ul>
D.	Internet or other similar network activity	<ul> <li>Companies within our corporate family that comprise the ZipRecruiter Group</li> <li>Data and web analytics providers</li> <li>Vendors and service providers</li> <li>Professional advisors</li> <li>Advertising partners</li> <li>Advertising networks</li> </ul>

(	Category Disclosed for a Business Purpose	Categories of Third Parties
E.	Geolocation data	<ul> <li>Companies within our corporate family that comprise the ZipRecruiter Group</li> <li>Data and web analytics providers</li> <li>Vendors and service providers</li> <li>Professional advisors</li> <li>Advertising partners</li> <li>Advertising networks</li> </ul>
	Inferences drawn from other personal information to create a profile	<ul> <li>Companies within our corporate family that comprise the ZipRecruiter Group</li> <li>Data and web analytics providers</li> <li>Vendors and service providers</li> <li>Professional advisors</li> </ul>

In addition, ZipRecruiter may disclose any or all of the personal information identified in the categories above to the following categories of third parties for a business purpose, depending on how you interact with our Services and/or where ZipRecruiter has an obligation to make such disclosure:

- Social networks, where you interact with such parties directly
- Third party partners that are integrated into our services, where you interact with such partners directly
- Government entities, where required by law or in order to comply with our legal or regulatory obligations
- Other third parties, where required by law or in order to protect our rights, or the rights of our customers or others
- Third parties, in connection with a merger, sale, or asset transfer.
- Third parties, where you have expressly consented to the disclosure your Personal Information

Additional information concerning the above disclosures, and the context in which your personal information may be shared with these categories of third parties, can be found in Section 6(A) of our Privacy Policy.

#### B. Sale of Personal Information

Your privacy is our priority, and we do not monetize your personal information by selling it to third parties.

After you visit our Website, you may receive advertisements about jobboard.io's services when you visit other websites (*i.e.*, social media sites, search engines or other websites that are unrelated to ZipRecruiter or jobboard.io). This happens because we use third-party vendors to provide you with information about our services based upon your interactions with our website. These third-party vendors may work with additional providers in their relationship network that help provide the advertising services the third-party vendors provide to us. **Note, we use these third parties only to show you ads about jobboard.io services** (*i.e.*, we do not use third parties to advertise any other company's products or services to you).

Our third-party vendors and, if applicable, providers in their relationship network, may use the information they collect for purposes that are unrelated to showing you ads about our services. When this information is used for a purpose other than showing ads about our services or other services we have requested, it may constitute a "sale" of personal information under the CCPA.

Pursuant to the CCPA, in the preceding twelve (12) months, we have sold the following categories of personal information for the purpose of showing you ads about jobboard.io services:

Category A: Identifiers

Category D: Internet or other similar network activity

Category E: Geolocation data

In this limited context, we may sell your personal information to the following categories of third parties:

Third-party advertising partners or advertising networks

The CCPA prohibits third parties who purchase the personal information we hold from reselling it unless you have received explicit notice and an opportunity to opt-out of further sales.

## 4. Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how you can exercise them. These rights are not absolute and certain exceptions apply under the CCPA, such as when you provide personal information in your capacity an employee, owner, director, officer, or contractor of a company, partnership, sole proprietorship, non-profit, or government agency in the context of ZipRecruiter providing a service to that company, partnership, sole proprietorship, non-profit, or government agency.

#### A. Access to Specific Information and Data Portability Requests

If you are a California resident, and the CCPA does not recognize an exception that applies to you or your personal information, you may request that ZipRecruiter disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see <a href="Exercising Access">Exercising Access</a>, <a href="Data Portability">Data Portability</a>, and <a href="Deletion Requests">Deletion Requests</a> below), 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).
- If we sold or disclosed your personal information for a business purpose, two separate lists
  disclosing: (i) sales, identifying the personal information categories that each category of recipient
  purchased; and (ii) disclosures for a business purpose, identifying the personal information
  categories that each category of recipient obtained.

#### **B.** Deletion Requests

If you are a California resident, and the CCPA does not recognize an exception that applies to you or your personal information, you may request that ZipRecruiter delete any of your personal information we collected from you and retained. Once we receive and confirm your verifiable consumer request (see <a href="Exercising Access">Exercising Access</a>, Data Portability, and Deletion Requests), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request (in whole or in part) in accordance with any purpose that is permitted by the CCPA. For example, we may deny your deletion request if retaining the information (or a portion thereof) is necessary for us or our service provider(s) to:

- 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, or otherwise perform our contract with you;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- Debug products to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.);
- 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;
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
- Comply with a legal obligation; and/or
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

#### C. Exercising Access, Data Portability, and Deletion Requests

**Making a Verifiable Consumer Request**: To exercise an access, data portability, or deletion request as described above, you can submit a verifiable consumer request to us by:

Sending Us an Email with Your Request: You may send an email to <a href="mailto:dsars@ziprecruiter.com">dsars@ziprecruiter.com</a> (with a copy to <a href="mailto:support@jobboard.io">support@jobboard.io</a>), and specify that your request relates to the "jobboard.io website". To submit a verifiable consumer request via email, you must email us from the email address that is associated with your account (if you have one) or from the email address that was originally provided to us in the context of ZipRecruiter collecting your personal information. If you are requesting access to categories and/or specific pieces of your personal information, you will be asked to provide identifying information that enables us to verify you with information in our system. Once you submit your verifiable consumer request, we will verify your identity by matching the information you provided us with information in our systems.

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. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Using an Authorized Agent: If you use an authorized agent to submit a request to access, delete, or optout on your behalf, the authorized agent must: (1) be a person or business entity registered with the California Secretary of State to conduct business in California; (2) provide proof of such registration; and (3) provide documentation or other proof indicating that they are authorized to act on your behalf. For

requests to access or delete, we may require you to verify your identity directly with us, and directly confirm with us that you provided the authorized agent permission to submit the request.

**Limitations on CCPA Requests**: You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

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

#### D. Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time, we will inform you of the reason and extension period in writing. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. 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. Opting Out from the Sale of Personal Information

For more information, or to submit an opt-out request, you (or your authorized representative) may visit our "Notice of Right to Opt Out" page or email your request to <a href="mailto:dsars@ziprecruiter.com">dsars@ziprecruiter.com</a> (with a copy to <a href="mailto:support@jobboard.io">support@jobboard.io</a>). You do not need to create an account with us to exercise your opt-out request. We will only use personal information provided in an opt-out request to review and comply with the request.

#### 5. 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 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 or quality of goods or services.

## 6. ZipRecruiter as a Service Provider

In certain instances, our clients hire ZipRecruiter to provide jobboard.io services on behalf of the client. In such case, we process personal information under the direction of that client as a service provider, and we have no direct relationship with the individuals (consumers) whose personal information we process.

Where ZipRecruiter acts as a service provider, it will collect, retain, use, disclose, and/or otherwise process personal information (i) to fulfill ZipRecruiter's obligations to perform the services pursuant to a written agreement with that client; (ii) pursuant to a valid business purpose, as permitted under the CCPA; and/or (iii) as otherwise directed by the client in writing. Where ZipRecruiter processes personal data in the capacity of a service provider, ZipRecruiter does not sell that personal information or otherwise retain, use, or disclose personal information for any commercial purpose, except as otherwise directed by the client in writing.

In addition to the purposes set forth above, ZipRecruiter may collect, retain, use, disclose, and otherwise process personal information in the context of a service provider:

- To retain and employ another service provider as a subcontractor, where the subcontractor meets the requirements for a service provider under the CCPA;
- For internal only use, to build or improve the quality of the jobboard.io services (as permitted under CCPA);
- To detect data security incidents, or protect against fraudulent or illegal activity;
- To comply with applicable laws;
- To comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities;
- To cooperate with law enforcement agencies concerning conduct or activity that a client, ZipRecruiter, or third party reasonably and in good faith believes may violate federal, state, or local law;
- To exercise or defend legal claims; and/or
- To collect, use, retain, share, or disclose information that has been aggregated or de-identified, in accordance with the CCPA.

Where ZipRecruiter processes your personal data in the capacity of a service provider, and you seek access, or want to correct, amend, or delete your personal data, or have another request, we will provide you with the client's contact information, so you can contact them directly. In rare instances, however, circumstances may necessitate ZipRecruiter assisting you with your question or request.

## 7. Changes to this California Privacy Notice

We reserve the right to change this Privacy Notice at any time. If we propose to make any material changes, we will notify you by posting a notice on the Website or by issuing an email to the email address listed by registered users prior to the changes becoming effective, and will update the Privacy Notice's effective date. You acknowledge that it is your responsibility to maintain a valid email address as a registered user, and to review the Website and this Privacy Notice periodically in order to be aware of any modifications. If you object to any changes to the revised Privacy Notice, you can stop using our services and close your account with us. However, if you continue to use our services (including the Website) after we publish a

new or updated Privacy Notice, you acknowledge that such continued use means that the treatment of your personal information will be subject to the new or updated Privacy Notice.

#### 8. Contact Information

If you have any questions or comments about this Privacy Notice, the ways in which ZipRecruiter collects and uses your information described herein, your choices and rights regarding such use, or wish to exercise your rights under California law, please contact us by using the communication means described below

Email: dsars@ziprecruiter.com (with a copy to support@jobboard.io)

*Mailing Address*: ZipRecruiter, Inc., 604 Arizona Avenue, Santa Monica, California 90401, USA, Attn: Business Affairs