

# Ceemingly – Privacy Policy

*Last updated: March 8, 2024*

## **Introduction**

This statement, set forth below, is our privacy statement (the “Privacy Policy”) for the Ceemingly website located at <http://ceemingly.com> (the “Site”) and the Ceemingly mobile application (the “App”). This Privacy Policy describes our practices regarding the collection, use, and disclosure of personally identifiable information (“Personal Information” or “PII”) we receive when you interact with our Site or App, or use our services (collectively, the “Services”), or when you otherwise interact with us. By using our Services, or by submitting information to us—whether through our Site, App, or other interactions with us—you accept the terms of this Privacy Policy.

As used in this Privacy Policy:

- a. the terms “Ceemingly”, “we,” and “us” refer to Ceemingly, Inc.;
- b. the terms “visitor,” “visitors,” “you,” and “your” refer to individuals who access or use our Services in their capacity as a private individual or consumer. Notwithstanding the foregoing, if your use of our Services arises out of your role as an employee, agent, or representative of the employer or other entity on whose behalf you create an account with or otherwise engage our Services (referred to herein as the “Company”), then you acknowledge and agree that Ceemingly’s collection of information from you relates solely to your use of our Services on behalf of the Company for business purposes only and not as a private individual or consumer.

By using the Services or by providing information to us while interacting with the Services, you consent to our use and disclosure of your Personal Information as outlined in this Privacy Policy. This Privacy Policy supplements any other privacy notice that we provide to you on specific occasions when we are collecting or processing your Personal Information.

This Privacy Policy is current as of the date that appears at the top of this page. Each time you visit the Site or otherwise use our Services, you should check the date of this Privacy Policy and review any changes since the last time you visited.

Our Services are controlled and operated from the State of Delaware within the United States. Your Personal Information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using our Site or engaging with our Services you consent to the transfer of information to countries outside of your country of residence which may have different data protection rules than those of your country.

**This Privacy Policy is written in the English language. We do not guarantee the accuracy of any translated versions of this Privacy Policy. To the extent any translated versions of this Privacy Policy conflicts with the English language version, the English language version shall control.**

## **Information We Collect**

We may collect information directly from you through your use of the Services and automatically through your use of the Site. We collect three basic types of information: Personal Information, Sensitive Personal Information, and Non-Personal Information.

Registration may be required for you to access and interact with certain aspects of our Services. You may, however, browse the informational areas of the Site without giving your Personal Information to us. You are under no obligation to provide us with Personal Information; however, your refusal to do so may prevent you from being able to utilize certain features of the Services.

As used in this Privacy Policy:

- a. The term “Personal Information” (“personal data” under the GDPR) means information that directly or indirectly identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked to, a particular visitor (such as a visitor’s name, address, email address, and telephone number) and also includes any Non-Personal Information that, with the aid of additional information, can identify a particular visitor. Personal Information does not include

publicly available information from government records, deidentified or aggregate information, or information excluded from the scope of “Personal Information” or “PII” as defined by applicable law.

- b. The term “Sensitive Personal Information” means information that reveals your social security, driver’s license, state identification card, or passport numbers, account log-in, financial account, debit card, or credit card numbers, racial or ethnic origin, religious or philosophical beliefs, trade union membership, political opinions, mental or physical health diagnosis, sexual orientation or gender identity, citizenship or immigration status, biometric or genetic information, data collected from a known child, the contents of mail, email, and text messages, and precise geolocation data. Ceemingly does not request or require you to provide Sensitive Personal Information or other protected classification characteristics. However, we ask that you carefully consider the information contained within your Resume, Candidate Videos, Applications, and other materials uploaded or submitted to or through the Services to ensure that you are not providing such categories of Personal Information to the extent they are not necessary for your job application or search. As used in this Policy, we include Sensitive Personal Information as Personal Information. Any Sensitive Personal Information collected will only be used to the extent necessary to provide our Services to you, or as otherwise permitted by applicable data privacy laws and regulations.
- c. The term “Non-Personal Information” means information that, without the aid of additional information, cannot be directly associated with a particular visitor. We may collect Non-Personal Information from you that may not by itself reasonably identify you as the source when you use our Services, or otherwise interact with us. Non-Personal Information may include: (i) device type, (ii) device operating system, (iii) internet browser type, (iv) internet service provider, (v) referring/exit pages, (vi) date/time stamp, and (vii) clickstream information. We will take reasonable measures to ensure that Non-Personal Information we collect is not personally identifiable and may not later be easily used to identify you as required by applicable law.

In the last twelve (12) months, the types of Personal Information we have collected, use, stored, and disclosed may include:

Category	Type(s) of Information
Identifiers	First Name, Last Name, Address, Email, Phone Number, IP Address
Financial Information	Credit/Debit Card Number (Last Four Digits), Expiration Date, Security Code, Verification Information
Categories of PII Listed in the CA Consumer Customer Records Law	First Name, Last Name, Address, Phone Number  <b>Information within this category may overlap with other categories.</b>
Characteristics of Protected Classifications under CA or US Law	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
Professional or Employment-Related Information	Current or past job history or performance evaluations
Education Information	Education-related information not otherwise publicly available
Internet or Other Similar Network Activities	Browsing History, Search History, Interactions with the Services
Geolocation Data	Geolocation, beacon based location, GPS location  <b>You may disable our use of certain identifiers and activities through your device or browser settings.</b>
Communication Data / Video Recordings	Interactions with or through Ceemingly’s Services, including third-party messaging services, apps, and websites, or by telephone, emails or notifications. Videos related to pre-recorded or live interviews through Ceemingly
Application and Resume Data	Your screening data, resume, and other materials shared when you apply to a job through Ceemingly, your activity in relation to that application, and the scheduling of and/or participation in an interview through Ceemingly

Business Data (Employers)	Verification documentation about the business, employee contact details and physical location of business (i.e. Federal Employer Identification Number (EIN)), other employer screening information
---------------------------	---

### **How We Collect Information**

The information we collect depends on how you use our Services, or otherwise interact with us. We collect Personal Information and Non-Personal Information in various ways, including:

### **Information You Provide to Us**

If you are merely a visitor and do not interact with any web forms on the Site, we do not collect any Personal Information about you, except to the limited extent described below. However, there may be circumstances in which you choose to provide Personal Information to us directly through an online web form available on our Site or by subscribing to receive ongoing email updates from Ceemingly about our Services.

We may also require that you provide us with certain Personal Information in order to register and create an account with our Services, including, for example, your full (first and last) name, email address, home or mobile telephone number, address, and bank or billing information. However, please note that payment methods such as your credit card number and/or bank account details are not collected by us directly, but by secure payment service providers.

While not required, you may decide to provide us with additional information about yourself through our Services including your photo, a video of you speaking in your own voice, geographic location, demographic information, educational and employment information and other Personal Information. Whether you choose to provide this Personal Information to us in connection with your use of the Services is up to you. However, please keep in mind that if you fail to provide certain categories of Personal Information, we may not be able to provide you with our full range of Services.

If you subscribe to receive email updates from Ceemingly, we may contact you to provide you with information about our Services and publications and to communicate with you for other marketing purposes. If you decide to subscribe, we will collect basic contact information about you, such as your name and email address. Please be aware that these communications may be sent to you by a third-party service provider on our behalf. You may opt-out of receiving such communications by following the opt-out instructions provided in the email.

### **Information Collected Automatically**

We use various tracking technologies to automatically collect information each time you (or an electronic device associated with you) visit or interact with our Services. For example, certain Personal Information may be collected automatically through the use of browser cookies and other technologies. Our Services utilize certain behavioral tracking technologies from third parties such as web analytics companies and third-party advertising platforms, including but not limited to Google Analytics, Google AdWords, Google Tag Manager and Mouseflow. These third party services collect information about you (including Personal Information) and your online activities over time and across different websites when you use our Services. We use third party services such as MouseFlow to track page content, click/touch, movement, scroll, and keystroke activity. If desired, you may opt-out of Mouseflow at: <https://mouseflow.com/opt-out/>.

Personal Information and Non-Personal Information that may be automatically collected includes: the type of computer or other device used to visit the Site and that device's unique identifier, internet service provider (ISP), IP address, geographic location, language settings, operating system, browser information, and other technical information. We may also collect information about your activity on the Site and interaction with our Services (for example, the date and time of your visit, which links you click, and how much time you spend interacting with us online).

### **Cookies**

Our Site uses cookies and other web technologies to improve our Site's performance and to enhance your browsing experience. Certain areas of our Site also use cookies to understand more about you, so we can offer you a more personalized browsing experience.

## **What is a cookie?**

A “cookie” is technology that allows our Site to store tokens of information (an “identifier”) in your browser. Cookies can be “Persistent” or “Session” cookies. Persistent Cookies remain on your device when you go offline, while Session Cookies are deleted as soon as you close your web browser. We use both Session and Persistent cookies in connection with our Site. Cookies are not used to determine the personal identity of anyone who is merely visiting our Site. On certain pages of our Site, cookies are used to help us track your interests while you browse the internet, so we can tailor more relevant advertising to you, and understand what is important to you.

## **How do I disable cookies?**

Most browsers automatically accept cookies. However, you can change your browser settings to block cookies in the future or to warn you when cookies are being sent. If you do not want to receive a cookie from our Site, you have the option of setting your browser to notify you when you receive a cookie, so that you may determine whether to accept it or not. However, please be aware that if you decline or disable cookies in your browser, you may not be able to fully experience some parts of our Site.

## **What cookies do we use?**

We use the following types of cookies on our Site:

### *a. Performance Cookies*

Some cookies help us with the performance and design of our Site. This allows us to measure how many times a page has been visited, and whether a page has been visited on our Site through an advertisement or by other means.

### *b. Functionality Cookies*

Some cookies help us to remember your settings which you may have selected or assist with other functionality when you browse and use our Site. This helps us to remember what you have selected, so on your return visit we remember your preferences.

### *c. Targeting and Tracking Cookies*

On certain pages of our Site, we use cookies to help us understand your interests as you browse the internet, so we can tailor and deliver to you a more personalized service in the future. This assists us in delivering relevant advertising to you during various advertising campaigns we may run from time to time through participating third-party sites.

These cookies collect information relating to the origin of your visit, where you were exposed to Ceemingly advertising, what advertising feature you saw, whether you arrived directly or indirectly to our Site, the device you used to visit our Site and which downloads you performed. This information is collected on an anonymous basis.

In addition, we also utilize cookies on certain pages of our Site to communicate with third-party data suppliers in order to extrapolate your digital behavior. This helps us to understand and target more relevant advertising in the future. The information we receive is anonymous but will include statistics such as demographics, online behavior, product interests, and lifestyle. Targeting and tracking cookies are provided via trusted third-party suppliers. Should you require more information regarding our suppliers and how these cookies operate please contact us.

By navigating on our Site, you agree that we can place cookies on your computer or device. If you prefer not to receive cookies, then you should stop using our Site or modify your browser settings.

## **Do Not Track Disclosure**

We currently do not respond to web browser “Do Not Track” or “DNT” signals.

## **Information Collected From Third Parties**

We may collect Personal Information about you from third parties or other publicly available sources. For example, we may collect Personal Information about you from connected third-party services (where you authorize us to connect your third-party account to your

Ceemingly account), social media platforms, analytics providers, or advertising networks, among other publicly available sources. We do not make any representations or warranties concerning, and will not in any way be liable for, any informational content, products, services, software, or other materials available through third parties. Your use of third parties' services and/or third party websites is governed by and subject to the terms and conditions of those third parties and/or third party websites. We encourage you to carefully review the privacy policies and statements of such third parties and/or third party websites.

### **Use of Your Personal and Non-Personal Information**

Your Non-Personal Information may be used or combined with other information, including Personal Information, that we have about you to personally identify you. If we combine any Non-Personal Information with your Personal Information, the combined information will be treated by us as Personal Information as long as it is combined.

We may use your information, including Personal Information, for the following purposes:

- To provide you with our Services, including but not limited to sharing your Personal Information with prospective employers, schools or universities;
- To provide you with relevant job listings and facilitate your application to the job listings of your choosing;
- To provide employers with relevant job candidates and to help employers hire more inclusively;
- To coordinate or facilitate interviews or communication, where you are using certain job-seeking or hiring Services;
- To communicate with you about your request for products or services from Ceemingly;
- To coordinate or manage your account or the Services you use;
- To communicate with you about your transactions and interactions made through our Services;
- To respond to your inquiries and provide technical support, assistance, and other customer service as requested;
- To personalize your experience with our Services;
- To send you offers, recommendations, and other promotional materials for our products and services;
- In connection with our administrative and internal business operations;
- In connection with research and analytics;
- To improve our Site and Services;
- To supply you with relevant advertising when you are visiting our Site or other sites that promote our Services (retargeting cookies);
- To promote the safety and security of our Services, our users, and other parties engaging with us;
- To fulfill our legal obligations and enforce contractual agreements; and
- For any other purpose for which you have given consent.

We also may, in compliance with applicable law, share your information, including Personal Information, with our third-party service providers for these purposes. We will not collect additional categories of Personal Information or use Personal Information we have collected for materially different, unrelated, or incompatible purposes without providing you notice.

### **Third-Party Use of Cookies and Other Tracking Technologies**

Some content available through the Services, including on the Site, may be served by third-parties, including advertisers, ad networks and servers, content providers, lead providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Services. The information they collect may be associated with your Personal Information or they may collect information, including Personal Information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see Controlling your Personal Information below.

### **Disclosure of Personal Information**

We may disclose any collected information, including Personal Information, for our business purposes as described below. 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 twelve (12) months, we have disclosed Personal for a business purpose to the categories of third parties indicated below.

We may also “share” certain collected information, including Personal Information, with certain third parties so that our Services are able to function properly and to deliver relevant personalized ads to you on and off our Site. We do not “sell” your Personal Information to third parties for money. However, some of these disclosures—including for purposes of delivering personalized advertisements to you—may constitute the “sharing” or even the “sale” of Personal Information under certain U.S. state privacy laws even though they involve no exchange of money. We do not knowingly “share” or sell Personal Information from children under the age of 16 for advertising purposes.

We may disclose your Personal Information outside of Ceemingly to the third parties identified below for a legitimate business purpose:

#### **To Our Affiliates and Partners**

We may disclose your Personal Information to our affiliates, including companies within the Ceemingly Group. We may also disclose your Personal Information to our trusted business partners who help us understand users of our Services, reach new audiences, and introduce new opportunities to members of our community.

#### **To Employers**

We may disclose your Personal Information to employers using our Services (“Employers”) if you are using our Services as a job candidate (“Candidates”). For example, we may disclose your Personal Information to Employers as part of the job searching, application, and interviewing processes available through our Services. This may include the transfer of your application, resume, candidate information, and/or contact details.

#### **To Candidates**

We may disclose certain Employer-related information, including Personal Information, to Candidates if you are using our Services as an Employer. This may include the name of the Employer’s representative, the Employer’s location, and the Employer’s interactions with our Services, among other things. This is done in order to provide Candidates with important information necessary to evaluate potential employment opportunities.

#### **To Other Users of the Services**

We may disclose your Personal Information to recruiters and/or their agents or representatives, or any other users of the Services that are permitted to have access to our Candidate Database, to which Candidate Personal Information may be automatically added upon account creation.

#### **To Our Service Providers, Vendors, and Contractors**

We may disclose your Personal Information where the disclosure is necessary to fulfill your request and involves a third-party organization with which Ceemingly has a relationship. For example, we may disclose your Personal Information to third-party vendors, service providers, contractors, or agents who perform specialized functions on our behalf. These third parties may include those who assist us with, for example, video uploading and processing, information technology, payment processing, and other administrative support services to operate our Services.

#### **To Law Enforcement or Other Officials**

We may disclose your Personal Information to law enforcement or other government officials if it relates to a criminal investigation or alleged criminal activity. We may also disclose your Personal Information: (i) if required or permitted to do so by law; (ii) for fraud protection and credit risk reduction purposes; (iii) in the good-faith belief that such action is necessary to protect our rights, interests, or

property; (iv) in the good-faith belief that such action is necessary to protect your safety or the safety of others; or (v) to comply with a judicial proceeding, court order, subpoena, or other similar legal or administrative process.

### **To Transaction-Related Parties**

If we become involved in a transaction involving the sale of our assets, such as a merger or acquisition, or if we are transferred to another company, we may disclose and/or transfer your Personal Information as part of the transaction. If the surviving entity in that transaction is not us, the surviving company may use your Personal Information pursuant to its own privacy policies, and those policies may be different from this Privacy Policy.

### **With Your Consent**

We may disclose your Personal Information to other third parties for any purpose as directed by you or otherwise with your consent. If you post content through our Services, as a Candidate or Employer, in a manner that is intended to make that content public or otherwise searchable by others, we reserve the right to share such information with third parties at our discretion, subject to agreement with such third parties. Where permitted by applicable law, we may share your Non-Personal Information for any purpose not prohibited by applicable law or inconsistent with this Privacy Policy or any written representation we have made to you at the point and time of the collection.

### **Categories of Personal Information Disclosed for a Business Purpose**

In the last twelve (12) months, we may have disclosed the following categories of Personal Information to third parties for a lawful business purpose:

<b>Personal Information Category</b>	<b>Category of Third-Party Recipients</b>
Identifiers	Affiliates, Service Providers, Internet Cookie Data Recipients (i.e. Google Analytics), Data Analytic Providers, Government Entities, Operating Systems and Platforms, Social Networks
Financial Information	Affiliates, Service Providers
Categories of PII Listed in the CA Consumer Customer Records Law	Affiliates, Service Providers, Internet Cookie Data Recipients (i.e. Google Analytics), Data Analytic Providers, Government Entities, Operating Systems and Platforms, Social Networks
Characteristics of Protected Classifications under CA or US Law	Affiliates, Service Providers, Internet Cookie Data Recipients (i.e. Google Analytics), Data Analytic Providers, Government Entities, Operating Systems and Platforms, Social Networks
Professional or Employment-Related Information	Affiliates, Service Providers, Government Entities
Education Information	Affiliates, Service Providers, Government Entities
Internet or Other Similar Network Activities	Affiliates, Service Providers, Internet Cookie Data Recipients (i.e. Google Analytics), Data Analytic Providers, Government Entities, Operating Systems and Platforms, Social Networks
Geolocation Data	Affiliates, Service Providers, Internet Cookie Data Recipients (i.e. Google Analytics), Data Analytic Providers, Operating Systems and Platforms, Social Networks

### **Categories of Personal Information “Shared” or “Sold”**

In the preceding twelve (12) months, we may have “shared” or “sold” the following categories of Personal Information to third parties for the purposes described above, subject to your right to opt-out of such sharing or sale. Certain data privacy laws define “sharing” as the disclosure of Personal Information for purposes of cross-context behavioral (“targeted”) advertising. However, we do not collect or

compile Personal Information obtained through your use of our Services for traditional sale to outside parties for consumer marketing purposes.

Personal Information Category	Category of Third-Party Recipients
Identifiers	Internet Cookie Data Recipients (i.e. Google Analytics), Advertising Networks, Data Analytic Providers
Categories of PII Listed in the CA Consumer Customer Records Law	Internet Cookie Data Recipients (i.e. Google Analytics), Advertising Networks, Data Analytic Providers
Characteristics of Protected Classifications under CA or US Law	Internet Cookie Data Recipients (i.e. Google Analytics), Advertising Networks, Data Analytic Providers
Internet or Other Similar Network Activities	Internet Cookie Data Recipients (i.e. Google Analytics), Advertising Networks, Data Analytic Providers
Geolocation Data	Internet Cookie Data Recipients (i.e. Google Analytics), Advertising Networks, Data Analytic Providers

We do not sell or share any Sensitive Personal Information, and do not have actual knowledge that we sell or share the Personal Information of any consumer under 16 years of age.

### **Controlling your Personal Information**

As a user of our Services, you have certain legal rights related to your Personal Information.

If at any time you would like us to rectify, erase or restrict the processing of your Personal Information or delete your user account, if you would like to obtain confirmation whether or not your Personal Information is processed by us, or if you would like to exercise your right to data portability or withdraw your consent to processing (where applicable), please make the appropriate changes through your user account settings or contact us using the Contact Information below.

To help us process your request, please provide sufficient information to allow us to identify you in our records. We reserve the right to ask for additional information verifying your identity prior to disclosing any Personal Information to you. Should we ask for verification, the information you provide will be used only for verification purposes, and all copies of the information will be destroyed when the process is complete.

If you do not wish to receive update messages and/or direct marketing communications from us, you may opt-out by following any instructions included in the communication or by contacting us at the Contact Information provided below. Please be aware that although you may opt-out of update messages and/or direct marketing communications, we reserve the right to email you administrative notices regarding our Services, as permitted under the CAN-SPAM Act.

We will make commercially reasonable efforts to respond to opt-out requests and handle requests to access, update, change, or delete Personal Information as quickly as possible.

### **Legal Rights**

#### **GDPR Data Subject Rights**

If you are a data subject located in the European Economic Area (EEA) or United Kingdom (UK), the GDPR grants you certain data privacy rights. Your rights include the:

- **Right to Access**: You have the right to request a copy of your PII.
- **Right to Rectification**: You have the right to request that we correct any mistakes in your PII.
- **Right to Erasure**: You have the right to request that we delete your PII.
- **Right to Restrict Processing**: You have the right to restrict processing of your PII.
- **Right to Object to Processing**: You have the right to object to our processing of your PII.
- **Right to Data Portability**: You have the right to receive your PII in a structured, commonly used and machine-readable format.



- **Right to Not be Subject to Automated Individual Decision Making:** You have the right not to be subject to a decision based solely on automated processing.

To exercise your rights, please use the Verifiable Consumer Request method described below. Please be aware that your rights are limited to the extent permitted by applicable law.

### CCPA California Resident Rights

If you are a California resident, the CCPA grants you certain data privacy rights. Your rights include the:

- **Right to Access:** You have the right to request a copy of the specific pieces of PII that we have collected about you in the previous twelve (12) months. The information will be delivered by mail or electronically. Upon receipt of a Verifiable Consumer Request, we will disclose:
  - The categories of PII we have collected about you;
  - The categories of sources from which PII is collected;
  - Our business purpose for collecting PII;
  - The categories of third parties with whom we share PII, if any; and
  - The specific pieces of PII we have collected about you.
- **Right to Data Portability:** You have the right to receive your PII in a portable, readily usable format that allows you to transmit your information to another entity without hindrance.
- **Right to Correct Inaccurate Information:** You have the right to request that we correct inaccurate information about you that we maintain.
- **Right to Deletion:** You have the right request that we delete your PII.
- **Right to Be Free from Discrimination:** You have the right to not be discriminated against by us for exercising any of your rights under the CCPA. Unless permitted by the CCPA, we will not:
  - Deny goods or services to you;
  - Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
  - Provide a different level or quality of goods or services to you; or
  - Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

To exercise your rights, please use the Verifiable Consumer Request method described below. Please be aware that your rights (including those enumerated elsewhere in this Policy) are limited to the extent permitted by applicable law.

### *Right to Opt-Out of Sale or Sharing*

You have the right to opt-out of the sale or sharing of your Personal Information to third parties for targeted advertising purposes. To opt-out, you or your authorized representative may visit the “Personal Information” Section on the “Settings” page of your user account and toggle “off” the appropriate permissions. You may also opt-out by submitting a Verifiable Consumer Request to us using the information below. 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.

### *Additional California Privacy Rights*

California’s “Shine the Light” law permits Users of the Site that are California residents to request certain information regarding our disclosure of PII to third parties for their direct marketing purposes. To make such a request, please contact us at the Contact Information provided below.

### Verifiable Consumer Requests

You can exercise your legal rights by submitting a Verifiable Consumer Request to us by:

- Emailing us at [Support@ceemingly.com](mailto:Support@ceemingly.com) or
- Visiting us at [www.ceemingly.com](http://www.ceemingly.com)

Only you, or someone legally authorized to act on your behalf, may make a Verifiable Consumer Request related to your Personal Information. Making a Verifiable Consumer Request does not require you to create an account with us. You may only make a Verifiable Consumer Request for access to Personal Information twice in 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.

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.

#### *Response Timing and Format*

We will acknowledge receipt of a Verifiable Consumer Request within ten (10) days. We endeavor to respond to Verifiable Consumer Requests within thirty (30) days of its receipt. If we require more time (up to ninety (90) days), 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 Verifiable Consumer Requests, 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.

#### *For Users Located in the EEA or UK*

If you would like to file a complaint with us about our privacy practices, please contact us at the Contact Information provided below. If you are a data subject located in the EEA or UK, the GDPR grants you the right to lodge a complaint with a competent supervisory authority as well. To find a competent supervisory authority, EEA data subjects may visit: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en), while UK data subjects may visit: <https://ico.org.uk/global/contact-us/>.

#### *For Residents of Canada*

If you are not satisfied with how we have handled your matter, you may wish to contact the Office of the Privacy Commissioner of Canada (OPC). Residents of Alberta may also obtain information regarding Ceemingly's policies and practices with respect to its non-Canadian service providers by contacting us at the Contact Information below.

#### *For Residents of Certain US States*

Residents of certain US States may have additional privacy rights not specifically set forth in this Privacy Policy. If you believe you have such additional rights and wish to exercise them, you may contact us using the Contact Information below. Ceemingly is committed to complying with all applicable data privacy laws and regulations, however, please note that your rights are limited to the extent permitted by applicable law.

#### **Withdraw Consent**

Generally, we do not process Personal Information based on explicit consent. However, in the event we do, you have the right to withdraw your consent at any time, without affecting the lawfulness of the processing based on said consent before its withdrawal. If you would like to withdraw your consent, please contact us at the Contact Information provided below.

#### **Data Retention**

We will retain your Personal Information while you maintain an account with us or to the extent necessary to provide our Services. Thereafter, we will keep Personal Information for as long as reasonably necessary: (i) to respond to any queries from users; (ii) to demonstrate we treated users fairly; (iii) for ordinary business continuity procedures; and/or (iv) to comply with any applicable laws. We delete Personal Information within a reasonable period after we no longer need the information for the purposes set out in this Privacy Policy.

## **SPAM**

We do not participate in bulk email solicitations that you have not consented to receiving (i.e., “Spam”). We do not sell or disclose customer lists or email address lists to unrelated third parties. Except as otherwise provided herein, we do not share Personal Information with any third party advertisers.

## **Social Media and User-to-User Communication Services**

You may wish to participate in various forums, chats, and other social media services which we make available to you through our Services. The main aim of these features is to facilitate and allow you to share content with others, either as a Candidate or Employer. However, we cannot be held responsible if you share Personal Information through these functions that is subsequently used, misused, or otherwise appropriated by another user of our Services. When you share Personal Information directly with other users of our Services, those users may choose to share your Personal Information with additional parties. Ceemingly is not responsible for such sharing.

## **Third Party Links and Features**

We may provide links on the Site or otherwise in connection with the provision of our Services that link to other websites maintained on separate servers by individuals or organizations over which we have no control.

We may also offer you the opportunity to connect to the Services and/or create a user account with the Services using a third-party service, such as a social networking or social media platform. If you choose to connect to the Services using a third-party service, please understand that you may be sharing your Personal Information and other profile or account information from that third-party service with us. The Personal Information that is shared will depend on the settings you have enabled with that third-party service. We encourage you to review the privacy policies of such third-party services prior to using them to connect to or otherwise interact with the Services to understand how your Personal Information is shared and used in this context. The Services may also include tools provided by us or third-party services that enable you to communicate with other parties. If you use any such tools in connection with the Services, we encourage you to ensure that you only send messages to individuals who have provided you with their permission to send such messages.

We make no representations or warranties regarding the accuracy, or any other aspect of the information located on or received through third-party links, features, or servers. A link to a third party’s website or features should not be construed as an endorsement by us, even if it is framed entirely within a page of our Services. We make no representations or warranties regarding how user data is stored or used on third-party servers. Please note that this Privacy Policy does not apply to information that you provide to third parties or to information that third parties collect from you. Nor does this Privacy Policy apply to your information that we have shared with third parties. Whenever a third party receives your information, that information becomes subject to the third party’s privacy practices. We recommend reviewing the privacy statement of each third-party site linked from our Services to determine their use of your Personal Information.

## **Security**

Ceemingly works to protect the confidentiality and security of information it obtains from users of its Services. Access to such information is limited and procedures are in place designed to safeguard the information from loss, misuse, and improper disclosure. That said, please keep in mind that it is impossible under any available technology for us to identify and prevent all potential threats. Despite our efforts, no security measures can guarantee perfect security; nor can we guarantee that the information you provide will not be intercepted by others while being transmitted over the Internet. We are not liable for the illegal or immoral acts of third parties, and where the security of your information is beyond our control, we cannot guarantee the privacy of such information.

## **International Data Transfer**

Your information, including Personal Information, may be transferred to and maintained on computers located outside of your state, province, country, or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

We operate the Site and Services from our offices in the United States. If you are located outside of the United States and choose to provide information to us, please note that we transfer your information, including Personal Information, to the United States and process it there. Upon transfer to the United States, any Personal Information would then be subject to United States laws, and may be subject to disclosure to the United States' governmental authorities, courts, law enforcement, or regulatory agencies of that country, pursuant to United States laws.

In the event we transfer your Personal Information outside of your state, province, country, or other governmental jurisdiction, we will take commercially reasonable measures to ensure such transfers comply with applicable data protection laws and Personal Information is securely transferred. If you have any questions about our data transfer practices, please contact us at the Contact Information provided below.

### **Children**

Our Services are not intended for use by anyone under the age of 16. We understand the importance of protecting children's information, especially in an online environment, and we do not knowingly collect or maintain information from anyone under the age of 16 through our Services without their parents' consent as required by applicable law. If we discover that we have inadvertently collected information from a child under 16 years of age, we will promptly take all reasonable measures to delete such information from our systems.

### **Modifications to Privacy Policy**

We reserve the right to update this Privacy Policy from time-to-time in our sole discretion. If our privacy practices change materially in the future, we will post an updated version of the Privacy Policy to the Site. It is your responsibility to review this Privacy Policy for any changes each time you use the Site or our Services, or otherwise interact with us. We will not lessen your rights under this Privacy Policy without your explicit consent. If you do not agree with the changes made, we will honor any opt-out requests made after the Effective Date of a new privacy policy.

### **Contact us**

If you have questions or you do not feel that your concerns have been addressed in this Privacy Policy, please contact us by email at: [Support@ceemingly.com](mailto:Support@ceemingly.com). Please note that basic, unencrypted email is inherently insecure and can be intercepted and read by others. You should not include any sensitive medical, financial, or other personal information in your emails to us.

### **Effective Date**

This Privacy Policy was last modified as of the effective date printed above. This version of the privacy policy replaces and supersedes any prior privacy policies applicable to the Services.