



Improving Interviews

Privacy Statement

Last Updated: January 26, 2022

At Improving Interviews, we pride ourselves on our commitment to protecting your privacy. This Privacy Statement ("Statement") describes in greater detail the privacy practices of Improving Interviews, LLC, 5898 Chandler Court, Suite B, Westerville, Ohio 43082, and its affiliates and subsidiaries, meaning companies related by common ownership or control (collectively "us," "we," "our"). This Statement sets forth our practices for collecting and maintaining certain information collected about you, which we make transparent in order to provide you with control of your privacy.

If you have questions or complaints regarding our Privacy Statement or practices, please contact us using the contact information provided below.

1. WHEN THIS PRIVACY STATEMENT APPLIES. If a Service you are using links to this Privacy Statement, this Statement applies to you.

This Statement applies to our sites, products, and services (collectively the "Services") that link to this Statement. Improving Interviews is the responsible entity for all Personal Information subject to this Statement for our Services targeted to non-minor US customers. This Statement does not apply to information collected or used by Improving Interviews through other means. For example, it does not apply to information collected about our employees, contractors, service providers, or other business contacts. It also does not apply to websites or services maintained by other companies or organizations, even if those companies or organizations link to us, or we link to them. We are not responsible for the actions and privacy policies of any third parties or third-party websites.

2. HOW WE COLLECT INFORMATION. We may collect information directly from individuals and through our customers.

Our Software may be used by our clients to facilitate staffing and recruitment activities, including interview preparation and soliciting feedback post interview. Our software may be used by a variety of persons in different roles, including job applicants, recruiters, staffers, and employers. Accordingly, we collect information in various ways, including directly from individuals, and through our customers.

3. WHAT WE DO WITH YOUR INFORMATION. We want to be clear about what information we collect and how we use it to deliver our Services to you, operate our business, and help make our Services useful, more intelligent, and work better for you. We do not sell or share your Personal Information with third parties for their own commercial uses without your consent.

a) Types of Information We Collect. In connection with accessing our Services, we may collect information from you which can be used to identify you ("Personal Information"), such as your name, shipping/billing address, email address, phone, date of birth, gender, username and password. We may collect Personal Information when you register or open

an account, sign in, pay a bill, purchase a Service, call us for support, or give us feedback. We may also get information from other companies or third parties, such as when you sync a third-party account or service with your Improving Interviews Service, or when we may use service providers to supplement the Personal Information you give us (e.g., validate your mailing address) to help us maintain the accuracy of your data and provide you with better service. Finally, we may also collect information that would not be considered Personal Information (“non-PI”) from you when you create an account or otherwise use our Services. Non-PI information includes information that is anonymized and/or aggregated in such a manner that it cannot be used to identify any unique individual.

Our customers may share a variety of non-PI information with us including but not limited to the type of applicants that they seek to recruit, particular jobs that they seek to staff, or data on how many applicants have been interviewed for a particular position and/or provided an offer. They may also share with us information about which positions are eventually filled, and the demographics, qualifications and/or skills of applicants and hires. We may also receive other information as determined by a particular customer during their use of our Services.

We may also automatically collect certain usage information when you access our Services (“Usage Data”), such as Internet Protocol (“IP”) addresses, log files, unique device identifiers, pages viewed, browser type, any links you click on to leave or interact with our Services, and other usage information collected from cookies and other tracking technologies. For example, we collect IP addresses to track and aggregate non-personal information, such as using IP addresses to monitor the regions from which users navigate to our Services. We also collect IP addresses from users when they log into the Services as part of our log-in and security features.

Our Services may change over time and we may introduce new features that may collect new or different types of information. We reserve the right to update this Statement as necessary to reflect changes in the types of information we collect and how it is maintained.

b) How We Use Your Information. Unless prohibited by law, regulation, or a contractual obligation, we may use your information, including your Personal Information, for the following purposes:

- *Account Registration.* We may use your name, address, phone number, date of birth, gender, and email address to register your Improving Interviews Account for certain Services we provide and to communicate important information to you. We may obtain additional Personal Information about you, such as address change information, from commercially available sources, to keep our records current. If you set up an administrator account that may be accessed by people other than you, please note that they may see and have the ability to change or delete your Personal Information.
- *Communicate with You and Tell You About Other Services.* We may use your information to communicate with you about our Services and to give you offers for third-party products and services that we think may be of use to you. Please see below under “What You Can Do to Manage Your Privacy” for the choices you have regarding these communications.

- *To Improve Services and Develop New Services.* We may use your information to personalize or customize your experience and the Service, develop new features or services, and to improve the overall quality of Improving Interviews' Services.
- *To Provide Our Services and Operate Our Business.* We may use your information to operate our business, including providing Services you requested, provide you with support related to our Services, and to help us protect our Services, including to combat fraud and protect your information. Your information is also used as necessary to invoice and collect payment for the Services. Profiles for users may also be established and maintained through the use of collected information. Non-PI information may be used to provide our Services to various users and/or customers, including to provide statistical information and insights about the job market, employment success rates, and interview processes.
- *Customer Service and Technical Support.* We may use your name, address, phone number, email address, how you interact with our Services, and information about your computer configuration to resolve questions you may have about our Services and to follow up with you about your experience or resolve any issues. We may offer various Internet chat services. Internet Chat transmissions are encrypted but you should not supply more Personal Information than is required to address your specific issue. A transcript of the session may be retained to resolve questions or issues related to our Services.
- *Feedback.* We may use any information you volunteer in surveys you answer for us and combine them with answers from other customers in order to better understand our Services and how we may improve them. Answering any survey is optional.
- *Research.* We may prepare and share non-PI information about our customers with third parties, such as advertisers or partners, for research, academic, marketing and/or promotional purposes. For example, we may share demographic data that describes the percentage of our customers who use mobile services or who use a particular operating system. Or we may share data that describes trends in job opportunities or rates of success in seeking employment. We or our third-party partners may publicly report the aggregated findings of the research or analysis, but only in a way that would not allow you or any other person to be identified. We may also use collected information to create and monitor recruiting statistics.

c) How We Share Your Personal Information. From time to time, we may need to share your Personal Information with others.

- *Third-Party Service Providers.* We may share your information, including Personal Information and Usage Data, with third-party service providers who perform various functions to enable us to provide our Services and help us operate our business, such as website design, sending email communications, fraud detection and prevention, customer care, or performing analytics. Our contracts with these third parties require them to maintain the confidentiality of the Personal Information we provide to them, only act on our behalf and under our instructions, and not use Personal Information for purposes other than the product or service they provide to us or on our behalf.

- Response to Subpoenas and Other Legal Requests. We may share your information with courts, law enforcement agencies, or other government bodies when we have a good faith belief we're required or permitted to do so by law, including to meet national security or law enforcement requirements, to protect our company, or to respond to a court order, subpoena, search warrant, or other law enforcement request.
- Protection of Improving Interviews and Others. We may share account information, Personal Information and Usage Data when we believe it is appropriate to enforce the relevant Master Subscription Agreement or other agreements; or protect the rights, property, or safety of Improving Interviews, our Services, our users, or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction. This does not include selling, renting, sharing, or otherwise disclosing Personal Information of our customers for commercial purposes in violation of the commitments set forth in this Privacy Statement.
- Reporting to Credit Bureaus. We may share your information with credit bureaus, consumer reporting agencies, and card associations. Late payments, missed payments, or other defaults on your account may be reflected in your credit report and consumer report. We may also share your information with other companies, lawyers, credit bureaus, agents, government agencies, and card associations in connection with issues related to fraud, credit, or debt collection.
- Information Sharing Between Improving Interviews Entities. We share your information, including your Personal Information, with and among our affiliates and subsidiaries, except where prohibited by law, regulation, or a contractual obligation. The protections provided in this Privacy Statement apply across all Improving Interviews entities. Affiliates and subsidiaries mean companies related by common ownership or control. The reasons why we share your information include for our everyday business purposes, such as to process your transactions, maintain your accounts, operate our business, etc. We will also share your information in order for us to be able to offer our products and services to you. We may also share information about your creditworthiness, your transactions and experience so that we can operate our business effectively, detect and prevent fraud, and improve our Services.
- Sale of Our Business. If we sell, merge, or transfer any part of our business, we may be required to share your information.
- With your Consent. Other than as set out above, we will provide you with notice and the opportunity to choose when your Personal Information may be shared with other third parties.

d) Syncing, Linking, Connecting Your Bank Account or Other Third-Party Services with Your Improving Interviews Service. You may choose to sync certain Improving Interviews Services with information from other accounts. To sync your account information, we must access your online account. We will request your user name, password, and any other login data that you have set up to enable access. We use this information to update

and maintain the account information you download, to assist with the download process, and to enhance the Services we may provide in the future.

We may work with other companies or developers to offer you products and services and you may choose to sync, link or connect other third-party services with your Improving Interviews Service. Sometimes Improving Interviews may let you know about the service or product, or another company may let you know about an Improving Interviews service or product. It will be clear who is referring the service or product, and who is providing the service or product. If you choose to accept these services, providing your consent to either the third-party or to us, we may exchange your information, including your Personal Information, as well as information about how you interact with each company's service or product. This exchange of information is necessary to maintain business operations and to provide the ongoing service you've requested. By requesting or accepting these products or services, you are permitting us to provide your information, including your Personal Information, to the other party.

4. AGGREGATED ANONYMOUS INFORMATION. Anonymous information means information that has been stripped of any Personal Information and no longer can be used to identify a specific person. It may include, for example, statistical information about the demographics of our users, or the success rate of interviews. We may share aggregated, non-personally identifiable information with our existing and prospective business partners and advertisers.

5. WHAT YOU CAN DO TO MANAGE YOUR PRIVACY. You can view and edit information that identifies you online through your Improving Interviews Service. How you can access and control information that identifies you will depend on which Services you use. You have a choice about the use of information that identifies you, marketing communications you receive from us, and our use of cookies and other tracking technologies.

a) Managing Marketing Communications From Us. We will honor your choices when it comes to receiving marketing communications from us.

You have the following choices if you have been receiving marketing communications from us that you no longer wish to receive:

- Click the "unsubscribe" link in the email or newsletter you received.
- For SMS messages, reply "STOP" or follow the instructions in the message or settings to discontinue the Service.
- Subject to your control, our mobile applications may send push notifications to your mobile device. If you are receiving push notifications and no longer wish to receive these types of communications, you may turn them off at the device level.
- Remember that even if you choose not to receive marketing communications from us, we will continue to send you mandatory service or transactional communications.

b) Updating Your Personal Information. In connection with your right to manage your Personal Information you provide to us, you may access, update, change, correct or request deletion of your information either through the Service or through our customer support. You can reach our customer support by using the contact information provided in the "How to Contact Us" section of this Statement.

c) Cookies and Similar Tracking Technologies. The following is a high-level summary of our practices and your controls for cookies and other tracking technologies. For more information, please see our Cookies Policy.

In accordance with applicable law, Improving Interviews and our service providers may use commonly used tools to recognize your visit and track your interactions with our Services such as cookies, web beacons, pixels, local shared objects, and similar technologies (collectively referred to as "Cookies"). Sometimes this tracking is necessary in order for us to provide you the Service you requested. Other times, we combine Usage Data collected from Cookies with that of other customers to improve your and other customers' experience. You have control over some of the Usage Data we collect from Cookies and how we use it. Information on changing your browser settings to opt out of Cookies can be found in your browser settings. If you delete your cookies or if you set up your browser to decline cookies, some features of the Services may not work or may not work as designed.

In accordance with the Digital Advertising Alliance Principles, Improving Interviews also uses advertising networks and other third parties to display advertising on our website or to manage our advertising on other sites. Our third-party partners may place Cookies on our Services and unaffiliated websites in order to serve advertisements that may be relevant to you based on your browsing activities and interests, and to determine the effectiveness of such advertisements.

You also have the following additional choices to opt-out of certain tracking through Cookies for such purposes:

- Visit the Digital Advertising Alliance's or Network Advertising Initiative's opt-out page.
- Opt out of targeted ads on Facebook.
- Opt out of Google Analytics for display advertising or to customize Google Display Network ads.
- Manage Flash cookies.
- For mobile apps, please refer to your mobile device's settings, or download the AppChoices app.

Please note that even if you opt-out of such Cookies or otherwise opt-out of interest-based advertising, you may still receive advertisements, they just won't be tailored to your interests. Also, if you opt-out and later delete your Cookies, use a different browser, or buy a new computer, you may need to renew your opt-out choices.

d) Do Not Track. Like most other companies, our Services are not currently configured to respond to browsers' "Do Not Track" signals because at this time no formal "Do Not Track" standard has been adopted.

e) Social Media Features. Many of our Services may use or otherwise integrate with social media features, such as Facebook sharing ("Social Media Features"). These features may collect your IP address and which page you are visiting within our Service and may set a cookie to enable the feature to function properly. Social Media Features are either hosted by a third party or hosted directly by our Services. Your interactions with these features are governed by the privacy statement of the company providing the relevant Social Media Features.

6. DATA RETENTION AND YOUR ACCESS RIGHTS

a) Data Retention. In accordance with and as permitted by applicable law and regulations, we will retain your information as long as necessary to serve you, to maintain your account for as long as your account is active, or as otherwise needed to operate our business. When you close your account, we may continue to communicate with you about our Services, give you important business updates that may affect you, and let you know about products and services that may interest you, unless you have opted out of receiving marketing communications. We may also continue to use some of your information for business purposes and to improve our offerings or in some cases to develop new ones. We will retain and use your information as required by applicable regulations and Improving Interviews' records and information management policies to comply with our legal and reporting obligations, resolve disputes, enforce our agreements, complete any outstanding transactions and for the detection and prevention of fraud.

b) Your Access Rights.

- If you have created an online account with us and would like to update the Personal Information you have provided to us, you can access your account to view and make changes or corrections to your Personal Information.

Pursuant to the California Consumer Privacy Act (CCPA), a California resident may request to access or delete information collected from the California resident. However, information may not be deleted under certain circumstances including where maintenance of your information is necessary to complete a transaction for which the information was collected, to otherwise perform a contract between Improving Interviews and you, to protect against or prosecute fraudulent or illegal activity, to comply with a legal obligation, or to otherwise use your information internally in a lawful manner that is compatible with the context in which you provided the information. Before any request to access or delete information can be fulfilled, Improving Interviews will verify your identity and confirm your request. If a California resident wishes to use an authorized agent, the resident must provide the agent with written authorization as well as verify their identity directly with Improving Interviews. The exception to this is if the authorized agent is acting pursuant to a power of attorney under the California Probate Code.

7. SECURITY OF YOUR INFORMATION. Keeping your Information safe is important to us.

We provide reasonable and appropriate security measures in connection with securing Personal Information we collect.

For example, we:

- Constantly work to update our security practices to implement accepted best methods to protect your Personal Information, and review our security procedures carefully.
- Comply with applicable laws and security standards.
- Securely transmit your sensitive Personal Information.
- Train our staff and require them to safeguard your data.
- Transmit, store, protect, and access all cardholder information in compliance with the Payment Card Industry's Data Security Standards.

8. INTERNATIONAL DATA TRANSFERS.

In accordance with and as permitted by applicable law and regulations, we reserve the right to transfer your information, process and store it outside your country of residence to wherever we or our third-party service providers operate.

9. HOW TO CONTACT US. If you have questions or comments about this Privacy Statement, please contact us. We want your feedback and comments.

a) **Via Email.** If you have questions or complaints regarding our Privacy Statement or practices, please contact us by email at privacy@improvinginterviews.com.

b) **Via Direct Mail.** Improving Interviews, 5898 Chandler Court, Suite B, Westerville, Ohio 43082

10. CHANGES TO OUR PRIVACY STATEMENTS. From time to time we may change or update our Privacy Statements. We reserve the right to make changes or updates at any time. More information about how we will notify you is below.

If we make material changes to the way we process your Personal Information, we will provide you notice via our Service or by other communication channels, such as by email or community post. We will also update the date of this Privacy Statement. Please review any changes carefully. If you object to any of the changes and no longer wish to use our Services, you may close your account(s). All changes are effective immediately upon posting and your use of our Service after a notice of material change or posting of an updated Privacy Statement shall constitute your consent to all changes.

11. COLLECTION AND USE OF CHILDREN'S PERSONAL INFORMATION. We do not knowingly collect information from minors.

Improving Interviews' Services are intended for and directed to adults. Our Services are not directed to minors and we do not knowingly collect Personal Information from minors. If we learn that we have collected personal information from a minor we will delete that information.

12. YOUR CALIFORNIA PRIVACY RIGHTS.

We do not share your Personal Information with third parties for their marketing purposes without your consent. See more in Section 6 above.