

# Recruiterflow Privacy Policy

Welcome to [www.recruiterflow.com](http://www.recruiterflow.com) (the “Site”) of Recruiterflow, Inc. (“Recruiterflow”, “we”, “us” and “our”). This Site is operated by Recruiterflow and has been created to provide information about our company and our recruitment management services and related technologies and related services, including our applications for mobile devices (the “Platform, and together with the Site, the “Services”) to our Site visitors (“you”, “your”, “Customer”). This Privacy Policy sets forth our policy with respect to information including personally identifiable data (“Personal Data”) and other information that is collected from visitors to the Site and Services. This Privacy Policy also describes the choices available to you regarding use of or your access to your Personal Data, and how to update and correct your Personal Data.

By using our Service, you consent to the data collection, transfer, processing, storage, disclosure and other uses described in this Privacy Policy. All of the different forms of data, content, and information described below are collectively referred to as “information.”

## 1. Information We Collect:

- Personal Data That You Provide Through the Services:
- We collect Personal Data from you when you voluntarily provide such information to us. You may provide us with Personal Data when you:
  - Create accounts for Services,
  - Register for offers or events,
  - Provide billing and payment information,
  - Elect to receive marketing communications,
  - Complete a survey,
  - Receive customer support,
  - Purchase or register to use the Platform, or
  - Apply for a job.
- Personal Data that we collect includes your contact information (such as your name, email address, mailings address, or phone number), billing information (such as your credit card

information, security code, and billing address), your IP address, and the information that you

process on the Platform (such as names, titles, email addresses, mailing addresses, and phone numbers of your applicants, prospects, and contacts).

- In connection with the Platform, Recruiterflow collects Personal Data as directed by its customers (“Customers”), and has no direct relationship with the individuals whose Personal Data it processes on behalf of such Customers. Recruiterflow acknowledges that you have the right to access your personal information. If you are an employee or customer of one of our Customers and would like to correct, amend, or delete inaccurate data, please contact such Customer directly (the data controller). If requested to remove data we will respond within a reasonable timeframe. Images, videos, audio, and resumes containing PII might also be collected by our customers. Call recordings containing PII might also be collected through third-party integrations.
- Information We Collect Through the Services
- The Services that you purchase or register to use may connect and transmit system, application, or product data to Recruiterflow. This data may include, but is not limited to, operating system, system model, and IP address.
- When you use the Services, we and our partners collect certain information automatically through use of cookies or similar technologies. Recruiterflow and our partners use cookies or similar technologies to analyze trends, administer the Services, track your movements around the Services, and to gather demographic information about our user base as a whole. Information that we collect automatically may include:
  - Internet Protocol Address;
  - Browser type;
  - IP Address;
  - Mobile application;
  - Device type or ID;
  - Device user ID;
  - Browser language;
  - Operating system;
  - Referring site (site you visited before coming to the Site);
  - Date and time of visit;

- URL of pages visited; and
  - Other browsing behavior, such as white papers downloaded.
- We may link this information to Personal Information to provide better service to you and to improve our product and services offerings. Most browsers allow you to remove and block cookies and web beacons. Please note that if you choose to erase or block cookies, you will need to re-enter your user ID and password to access certain parts of the Site. You may also notice that you will be served only generic information not tailored to your specific interests. In addition, if you block cookies, you may not be able to use certain Services features or take full advantage of the Services.
- Many Internet browsers allow users to send a “Do Not Track” signal to websites they visit. Currently, there is no consensus on the meaning of “Do Not Track” or similar signals, and the Services have no mechanism to respond to such a signal.
- We use mobile analytics software to allow us to better understand the functionality of our Mobile Software on your phone. This software may record information such as how often you use the application, the events that occur within the application, aggregated usage, performance data, and where the application was downloaded from. We do not link the information we store within the analytics software to any personally identifiable information you submit within the mobile application.
- Furthermore, in the course of using the Services, you or someone else in your organization may provide us with information about your systems infrastructure and access to your systems infrastructure. In addition, Recruiterflow may discover this information by analyzing additional parts your systems infrastructure that you did not explicitly input into the Platform.
- Information We Collect From Other Sources We sometimes obtain information from other sources, such as mergers and acquisitions, data brokers, or commercial lists, and merge this with information we have previously collected.
- If you give us Personal Data on behalf of someone else (or someone else gives us Personal Data on your behalf), the person providing the Personal Data must have consent to do so from the person whose information is being provided to Recruiterflow. Some Recruiterflow events, websites or services may be co-branded and offered in conjunction with another company. For example, Recruiterflow might co-sponsor a webinar in conjunction with one of its partners and allow you to register for such webinar through the Site. If you provide Personal Data in these cases, both Recruiterflow and the other company(ies) may receive

the information collected and use the information according to each company's privacy policy and agreement with you.

- We partner with third parties to either display advertising on our website or to manage our advertising on other sites. Our third party partner may use technologies such as cookies to gather information about your activities on this website and other sites in order to provide

you

advertising based upon your browsing activities and interests. If you wish to not have this information used for the purpose of serving you interest-based ads, you may opt-out by deleting the cookie information from your browser. Please note this does not opt you out of being served generic, untargeted ads.

- The Platform may enable you to import contacts included in your email accounts. We do not collect the login credentials for such email accounts.

## 2. How We Use Information We Collect

We use Personal Data to conduct business, provide information and support for products and services, better understand your needs and interests, refine and develop our business, improve services, personalize communications and ensure a quality experience for users of the Services. For example, we may use your information to:

- Communicate, interact and build our relationship with you;
- Contact you with relevant promotions and information about Recruiterflow and affiliated third-parties;
- Process, fulfill and follow up on transactions and requests for products, services, support, training and information;
- Send you reminders about the expiration of your subscriptions (trial or paid) for Services;
- Create and maintain an account and register Services;
- Bill and accept payment from you for Services;
- Engage in market research;
- Measure, analyze and improve our products and services, the effectiveness of our Site or Services, and our advertising and marketing;
- Notify you about updates to our blogs;

- Monitor your use of the Services;
- Tell you when updates and new product versions are available;
- Personalize content and advertising;
- Help identify and communicate offers of products, programs and services that may be of interest to you;
- Send “refer-a-friend” email on your behalf with your consent;
- Consider your employment application;
- Comply with legal requirements;
- Enforce our terms of service, and prevent fraud and other prohibited or illegal activities;
- Provide agreed upon diagnostic, monitoring and management services; or ● Better communicate with you.

### 3. How We Share and Disclose Personal Data

We may share or disclose your Personal Data as follows:

- To our service providers and suppliers, who are acting and using your information on our behalf to provide the Services and help us with our business activities such as (processing your payments, providing customer service, or hosting our Platform). These companies are authorized to use your personal information only as necessary to provide these services to us. Transfers of personal data to subsequent third parties are covered by the services agreements between us and our customers.
- Based on a good faith belief that such disclosure is necessary to protect the rights or safety of any person or entity;
- Based on a good-faith belief that disclosure is necessary to respond to judicial process, valid government inquiry, or is otherwise required by law such as to comply with a subpoena, bankruptcy proceedings, or similar legal process;
- In the event that Recruiterflow or any of its assets are acquired, your information may be transferred with the company or the asset;
- To other third-parties for purposes to which you have allowed or consented (such as an authorized reseller); or
- When posted by you or an authorized third-party to our wikis, forums, blogs, message boards, chat rooms and other social networking environments.

In an ongoing effort to better understand and serve the users of the Services, Recruiterflow often

conducts research on its customer demographics, interests and behavior based on the Personal Data and other information provided to us. This research may be compiled and analyzed on an aggregate basis, and Recruiterflow may share this aggregate data with its affiliates, agents and business partners. This aggregate information does not identify you personally. Recruiterflow may also disclose aggregated user statistics in order to describe our services to current and prospective

business partners, and to other third parties for other lawful purposes.

#### 4. Your Choices Regarding Your Personal Data

Upon request Recruiterflow will provide you with information about whether we hold any of your personal information. To keep your Personal Data accurate, current, and complete, please contact us as specified below on “Contact Us ”section. We will take reasonable steps to update or correct and delete Personal Data in our possession that you have previously submitted via the Services. We will respond to your request within a reasonable timeframe.

We will retain personal data we process on behalf of our Customers for as long as needed to provide services to our Customers. Recruiterflow will retain this personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

If you wish to subscribe to our marketing communications, we will use your name and email address to send communications to you. You may elect to stop receiving our marketing emails by following the unsubscribe instructions included in such emails. Please also feel free to contact us if you have any questions about Recruiterflow’ Privacy Policy or the information practices of the Services.

We send you push notifications from time-to-time in order to update you about any events or promotions that we may be running. If you no longer wish to receive these types of communications, you may turn them off at the device level. To ensure you receive proper notifications, we will need to collect certain information about your device such as operating system and user identification information.

#### 5. Children’s Privacy

Use of the Services is only available to individuals who are of legal age to contract in their applicable jurisdiction. The Services are not directed to children under 13 years of age. If our policy changes, we will obtain consent from a parent or guardian before we knowingly collect data from anyone under the

age of 13.

#### 6. Links to Other Web Sites:

This Privacy Policy applies only to the Services. The Services may contain links to other web sites not operated or controlled by Recruiterflow (the "Third Party Sites"). In addition, our Services include social media features, such as links to our Facebook, Google+, Twitter, and LinkedIn pages. Your interactions with our information on such Third Party Sites are governed by the privacy statement of the provider of such Third Party Site. The policies and procedures we described here do not apply to the Third Party Sites. The links from the Services do not imply that Recruiterflow endorses or has reviewed the Third Party Sites. We suggest contacting those sites directly for information on their privacy policies.

#### 7. Service Providers, Business Partners and Others

We use certain trusted third party companies and individuals to help us provide, analyze, and improve the Service (including but not limited to data storage, maintenance services, database management, web analytics, security, payment processing, and improvement of the Service's features). For example, we use Amazon's storage service to store some of your information (you can find more information on Amazon's data security from [www.amazon.com](http://www.amazon.com)). These third parties may have access to your information only for purposes of performing these tasks on our behalf and under obligations similar to those in this Privacy Policy.

#### 8. Security

The security of your personal information is important to us. We follow generally accepted standards to protect the personal information submitted to us, both during transmission and once it is received. You acknowledge and agree that no Internet or email transmission is ever fully secure or error free. You agree to take special care in deciding what information you send to us via email. If you have any questions about the security of your personal information, you can contact us through our website.

#### 9. Changes to Recruiterflow' Privacy Policy

The Services and our business may change from time to time. As a result, at times it may be necessary for Recruiterflow to make changes to this Privacy Policy. Recruiterflow reserves the right

to update or modify this Privacy Policy at any time and from time to time. We will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this Site of any material changes to this Privacy Policy. Please review this policy periodically, and especially before you provide any Personal Data. This Privacy Policy was last updated on the date indicated above. Your continued use of the Services after any changes or revisions to this Privacy Policy shall indicate your agreement with the terms of such revised Privacy Policy.

#### 10. Customer Data

Recruiterflow will not review, share, distribute, or reference any such Customer Data without your permission except when required by law. Recruiterflow may access Customer Data only for the purposes of providing the services, preventing or addressing service or technical problems, at a Customer's request in connection with customer support matters, or as may be required by law. In the case of liquidation, the same terms to Customer Data apply.

11. Contact Us If you have questions about this Privacy Policy, please contact us using one of the methods specified at <https://www.recruiterflow.com/contact>. The email ID for our data protection officer is [dataprivacy@recruiterflow.com](mailto:dataprivacy@recruiterflow.com)

12. In case of a data breach, please contact [dataprivacy@recruiterflow.com](mailto:dataprivacy@recruiterflow.com) to reach our data privacy officer.

## Data Subject Rights

- Right to be Informed:



- Personal data like name, email, phone number, social profile information is collected ○ This data is used to provide information to candidates about potential jobs that they might be interested in
- This data is not shared with third parties by Recruiterflow
- Users provide consent by applying to jobs and entering this information. Users can withdraw consent for data processing by emailing [dataprivacy@recruiterflow.com](mailto:dataprivacy@recruiterflow.com) ○ Recruiterflow customers have the responsibility of obtaining informed consent as per law in the country of operation
- **Right of Access:**
  - Users can request a copy of the data by sending an email to [dataprivacy@recruiterflow.com](mailto:dataprivacy@recruiterflow.com)
  - We will respond to all requests for data within four business days
- **Right to Rectification:**
  - Users can apply for rectification of data by sending an email to [dataprivacy@recruiterflow.com](mailto:dataprivacy@recruiterflow.com)
- **Right to Erasure (Right to be Forgotten):**
  - If users wish to request the deletion of their data, they can reach out to us by emailing [dataprivacy@recruiterflow.com](mailto:dataprivacy@recruiterflow.com)
  - We will convey this request to Recruiterflow customers who will take the required action
- **Right to Restrict Processing:**
  - Users can send an email to [dataprivacy@recruiterflow.com](mailto:dataprivacy@recruiterflow.com) in case they want to restrict processing of their data due to inaccuracy or if they believe their data is being unlawfully processed. We will convey this request to Recruiterflow customers.
- **Right to Data Portability:**
  - On receiving a request for data at [dataprivacy@recruiterflow.com](mailto:dataprivacy@recruiterflow.com), we provide a copy of data on request in JSON format.
- **Right to Object:**
  - Users can unsubscribe from emails in case they object to processing of their data. They can also send an email to [dataprivacy@recruiterflow.com](mailto:dataprivacy@recruiterflow.com) to do the same.
  - Users can do this when they are not interested or did not opt-in to receive these communications
- **Rights related to automated decision-making and profiling:**
  - We do not provide automated decision-making services. All decisions are taken by humans.

## Consent

Users consent to provide their data by filling out application forms. They can withdraw consent any time by sending an email to [dataprivacy@recruiterflow.com](mailto:dataprivacy@recruiterflow.com)

## Data Retention and Deletion Practices

- **Retention periods:** Recruiterflow customers are owners of their data. They keep / erase data as per company policy. Please send an email to [dataprivacy@recruiterflow.com](mailto:dataprivacy@recruiterflow.com) to request erasure of your data
- **Secure Deletion procedures:** When data is deleted, it is removed from all database servers and file storage. Data is deleted completely from backups within fourteen business days.