

# Privacy Policy

Last modified: December 22, 2022

## **Introduction:**

ClearCompany, Inc. and its subsidiaries (“Company” or “We”) respect your privacy and are committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide when you visit the website <https://www.clearcompany.com/> our related sub-domains [https://\\*.clearcompany.com](https://*.clearcompany.com) and our Software-as-a-Service (SaaS) application (collectively referred to as our “Website”) and our practices for collecting, using, maintaining, protecting and disclosing that information.

ClearCompany will never sell your personal information to a third party.

## **This policy applies to information we collect:**

- On this Website.
- In e-mail, text and other electronic messages between you and this Website.

## **It does not apply to information collected by:**

- us offline or through any other means, including on any other website operated by Company or any third party; or
- any third party, including through any application or content (including advertising) that may link to or be accessible from the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is to not use our Website. By accessing or using this Website, you agree to this privacy policy. This policy may change from time to time. Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

## **Children Under the Age of 13:**

Our Website is not intended for children under 13 years of age. No one under age 13 may provide any personal information to the Website. We do not knowingly collect

personal information from children under 13. If you are under 13, do not use or provide any information on this Website or on or through any of its features/register on the B4685992.1 2 Website, make any purchases through the Website, use any of the interactive or public comment features of this Website or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at [privacy@clearcompany.com](mailto:privacy@clearcompany.com).

### **Information We Collect About You and How We Collect It:**

ClearCompany may collect the following information, including Personal Information from and about you:

**From your interaction with Sales, Marketing, and Customer Support:** We collect Personal Information such as your name, company name, email address, phone number, and billing information when you request a demo of our Services, or request sales information or customer service.

**Cookies, Scripts and Related Technologies:** When you visit our website, [www.clearcompany.com](http://www.clearcompany.com), we and our third-party service providers receive and record Personal Information that you may have provided and your digital signature, such as your IP address. The technologies we use to track your movements around our website include cookies, tracking scripts and pixels, and tagging technologies, which we may employ to understand your preferences, improve your experience on our website, etc. You can control the use of cookies at the individual browser level.

**Collection of Data by Advertisers:** We may also use third parties to serve ads on our website or to manage our advertising on other sites. Certain third party partners may automatically collect information about your visits to this and other websites, your IP address, your ISP, the browser you use to visit our website (but not your name, address, e-mail address or telephone number). They do this by using cookies, pixel tags or other technologies. Information collected may be used, among other things, to deliver advertising targeted to your interests and to better understand the usage and visitation of our website and the other sites tracked by these third parties. This policy does not apply to, and we are not responsible for, cookies or pixel tags in third party ads, and we encourage you to check the privacy policies of advertisers and/or ad services to learn about their use of cookies and other technologies.

### **Do Not Track Policy:**

Some browsers have “do not track” features that allow you to tell a website not to track

you. These features are not all uniform. We do not currently respond to those signals. If you block cookies, certain features on our sites may not work. If you block or reject cookies, not all of the tracking described here will stop. Options you select are browser and device specific.

**Information You Provide to Us:****The information we collect on or through our Website may include:**

- As a SaaS provider, information gathered on behalf of our customers about their business processes, employees, vendors, and applicants.
- Information that you provide by filling in forms on our Website. This includes information provided at the time of requesting further services. We may also ask you for information when you report a problem with our Website.
- Records and copies of your correspondence (including e-mail addresses), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.

**How We Use Your Information:****We use information that we collect about you or that you provide to us, including any personal information:**

- To present our Website and its contents to you.
- To provide and enhance the Website services.
- To provide you with information, products or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or any products or services we offer or provide through it.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may also use your information to contact you about our own and third-parties' goods and services that may be of interest to you. If you do not want us to use your information to receive marketing emails follow the instructions in the email to opt out or contact us at [info@clearcompany.com](mailto:info@clearcompany.com).

**Disclosure of Your Information:**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

**We may disclose personal information that we collect or you provide as described in this privacy policy:**

- To contractors, service providers and other third parties we use to support our business.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of ClearCompany, Inc.'s assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by ClearCompany, Inc. about our Website users is among the assets transferred.
- To fulfill the purpose for which you provide it. For example, if you give us an e-mail address to use the "e-mail a friend" feature of our Website, we will transmit the contents of that e-mail and your e-mail address to the recipients.
- For any other purpose disclosed by us when you provide the information.
- To employers, when you apply to a position managed by the Website on behalf of that employer, or when you become an employee of an employer who uses the Website.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law or legal process, including to respond to any government or regulatory request.
- To enforce or apply our terms of use as posted on [www.clearcompany.com](http://www.clearcompany.com) and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of ClearCompany, Inc., our customers or others.

## **Choices About How We Use and Disclose Your Information:**

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse 6 cookies, please note that some parts of this site may then be inaccessible or not function properly.
- **Promotional Offers from the Company.** If you do not wish to have your e-mail address used by the Company to promote our own or third parties' products or services, you can opt-out by sending us an e-mail stating your request to [info@clearcompany.com](mailto:info@clearcompany.com). If we have sent you a promotional email, you may send us a return e-mail asking to be omitted from future email distributions.
- **We do not control third parties' collection or use of your information to serve interest-based advertising.** However these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

## **Updating, Correcting and Deleting Data:**

ClearCompany provides an individual who has submitted information on the Site with the ability to review, correct, and request the deletion of any of the personally identifiable information that was entered in their profile on the Site. To correct or delete any information in a Site profile, an individual may update that profile (through their account page on the Site) or may contact ClearCompany by e-mailing us at [DPO@clearcompany.com](mailto:DPO@clearcompany.com).

## **Data Originating From the European Union:**

ClearCompany now relies on Standard Contractual Clauses to transfer personal data from the EU, UK, and Switzerland.

ClearCompany will continue to maintain its Privacy Shield certification and continue to comply with the principles in respect to the data that was previously transferred under the EU-US Privacy Shield Frameworks and Swiss-US Privacy Shield Framework. To view our Privacy Shield Policy please visit <https://www.privacyshield.gov/list> and if you have any questions please email [DPO@clearcompany.com](mailto:DPO@clearcompany.com).

**ClearCompany's Data Protection Officer:**

ClearCompany's Data Protection Officer can be reached at [DPO@clearcompany.com](mailto:DPO@clearcompany.com).

**Data Retention:**

ClearCompany retains personal information and the personal data we process on behalf of our customers for as long as needed to provide the Services to customers, job-seekers and employees enrolled in those Services. We will retain and use this personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements with customers, and/or the period required by laws in applicable jurisdictions.

**Data Security:**

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

**Changes to Our Privacy Policy:**

It is our policy to post any changes we make to our privacy policy on this page. The date the privacy policy was last revised is identified at the top of the page.

**Contact Information:**

To ask questions or comment about this privacy policy and our privacy practices, contact us at [privacy@clearcompany.com](mailto:privacy@clearcompany.com).

