

# PRIVACY

**Last Updated: March 18, 2021**

**Hirenomics Executive Search** takes the privacy and security of your information seriously. This Policy describes how Hirenomics Executive Search and its affiliates and subsidiaries (**collectively “Hirenomics”, “we” or “us”**) collect, use, transfer, and disclose your information.

This Policy covers information Hirenomics collects in connection with our Recruitment Services. This Policy also covers information collected through:

- web sites we operate from which you are accessing this Policy (the “Site”),
- the software applications we make available for use on or through computers or mobile devices (the “Apps”),
- our social media pages and apps to which the Site links (collectively, our “Social Media Pages”), and
- HTML-formatted email messages we send to you that link to this Policy (collectively, including the Site, Apps, and our Social Media Pages, the “Online Systems”).

This Policy also covers other means by which we collect information. For example, it also covers how we collect information from in person discussions, telephone conversations, and through non-electronic communications (i.e., collection through other means than our Online Systems).

## **WHO WE ARE**

Hirenomics is a US based, National Executive Search Firm. We help organizations select and hire the talent they need to execute their strategies and company goals.

Hirenomics offers services to help companies recruit new personnel and attract talent (“Recruitment Services”). We provide Recruitment Services to clients searching for talent at the board-level, chief executive, and other senior executive and key stakeholder positions. We also help clients find talent for middle to upper-level talent.

## **PERSONAL INFORMATION WE COLLECT**

Hirenomics collects information that identifies you as an individual or relates to an identifiable individual (“Personal Information”) to provide Services to you, our clients and to operate our business. The type of Personal Information we collect about you depends on the situation at hand.

- We may collect your name, contact details and your preferred means of communication. We may also collect your responses to survey and assessment questions.
- During our Recruitment Services, we may collect the following types of information about you as a potential candidate: name, address, telephone number, e-mail address, resume information (employment history, education, professional credentials, memberships in professional organizations, skills, etc.), citizenship, information from former employers and other references, and additional information to the extent we have acquired, or you have provided us with such

information. We also use photos of you that you provide to us or that you make publicly available on the Internet (e.g., LinkedIn). As permitted by applicable laws, we obtain background verification information.

- When you are utilizing our Online Systems, we may collect login user credentials like usernames, passwords, and password hints.
- Where permitted by law, we may collect compensation and benefits information about you to consult with you or our clients on rewards and benefits.
- In certain cases, we request sensitive Personal Information about you. We may use this information to ensure that our Services conform with legal requirements, including equal opportunity laws. Our assessments and surveys may include demographic survey questions like questions about gender, race, age, or country of origin. Except in these limited cases, we encourage you not to provide any other sensitive Personal Information to us, such as government identification numbers, payment card numbers, information related to racial or ethnic origin, political opinions, religious or other beliefs, health, biometrics or genetic characteristics, criminal background, or trade union membership.

Please do not provide us with any Personal Information if you do not agree with this Policy.

## **HOW WE COLLECT PERSONAL INFORMATION**

As you interact with Hirenomics, you provide some Personal Information directly.

- We may collect Personal Information when you register to use our Online Systems, submit, or build a resume, respond to employment opportunities, complete online assessments or surveys, participate in online courseware, provide Personal Information about yourself to our coaches or contact us via e-mail, electronic forms, telephone or postal mail.
- If you submit any Personal Information about other people to us or to our service providers, you represent that you have the authority to do so and to permit us to use the information in accordance with this Policy.

Personal Information about you may also come from our clients to whom we provide Services.

We may also obtain Personal Information about you from third parties.

- When providing our Recruitment Services, we may also obtain Personal Information about you from referrals, networking activities, public databases, joint marketing partners, licensed databases, and social media platforms. The information we collect from these third parties includes information about the identity of potential candidates (e.g., an individual's name, address, telephone number, e-mail address), information about their background and qualifications (employment history, education, professional credentials, memberships in professional organizations, skills, etc.), citizenship, information from former employers and other references. We also use photos of you that you provide to us or that you make publicly available on the Internet (e.g., LinkedIn). As permitted by applicable laws, we obtain background verification information.

## HOW WE USE THE PERSONAL INFORMATION WE COLLECT

Hirenomics uses the Personal Information it collects in several ways. The summary below provides additional details about the ways we use the Personal Information we collect.

During our Recruitment Services, we may use Personal Information that we have collected to create a profile about you. This profile may be used to identify professional opportunities that we think may be of interest to you.

- We may contact you from time to time regarding those opportunities. We may also contact individuals from time to time for referrals. We may solicit names of, or additional Personal Information regarding, potential candidates in connection with our Recruitment Services to understand the market and provide other advisory services to our clients.

You can always object to our creating a profile about you, see the 'Choices and Access' section below on how you can object.

- If you object, we will remove your profile from our database, but this will also mean that you will not be considered for opportunities in the future.

During our Recruitment Services, we also use your Personal Information to confirm references and conduct education and background checks as appropriate.

- We further use your Personal Information that we collect to aggregate and disclose diversity and other statistical information regarding our candidates and placement activities. We do so to manage our contractual relationship with you, with your consent, or because we have a legitimate business interest.

We use your Personal Information to respond to your inquiries, to verify your information, or to share information with you.

- We use your Personal Information to respond to your inquiries and fulfill your requests. If you contact us, we keep a record of your contact information and correspondence, and we use information you provide in your message to respond to your inquiry.

From time to time, we use your Personal Information to send you important information regarding the Online Systems, changes to our terms, conditions, policies, and other administrative information.

- We may also contact you to verify that the Personal Information we collected about you is accurate and current. We use the Personal Information to manage our contractual relationship with you or to comply with a legal obligation.

We use your Personal Information to operate our business.

We use your Personal Information for our business purposes, such as audits, internal communication regarding candidates and clients, determining the effectiveness of our promotional activities, administering our Services, maintaining, and securing our infrastructure, and financial transactions.

- We use this Personal Information to manage our contractual relationship with our clients, to comply with a legal obligation, and because we have a legitimate beneficial business interest.

We may use Personal Information to conduct analytics and thought leadership materials. Any published product will refer only to larger aggregations of individuals and will not identify you personally or include any results attributable to you. We perform analytics because we have a legitimate beneficial business interest in doing so.

We may retain and use Personal Information about you for research, publication, development, benchmarking and norms, validation, longitudinal studies, trend analysis, to improve and enhance our Services or to develop and market new Services. We may use Personal Information about you to ensure that our Services conform with legal requirements like equal opportunity laws.

We may use your Personal Information to send you information or marketing materials. Please note that if we obtained your Personal Information because of an engagement with our client, you will not receive marketing materials as a result of the Personal Information we obtained.

Hirenomics sends informational e-mails, articles, white papers, proposals, engagement letters, and information regarding our Services.

- Occasionally, we may desire to use your Personal Information in press releases and direct marketing materials. Before we use your Personal Information in that way, Hirenomics will reach out to you to be granted permission to do so.

How your Personal Information is disclosed will depend upon the situation.

We use your Personal Information to provide our Recruiting Services.

- During our Recruitment Services, we disclose Personal Information regarding candidates, including the results of assessments and related data, to prospective employers that have engaged Hirenomics to fulfill recruitment requests, or to reference sources.
- If you have completed an assessment or survey at our client's request as part of our Consulting Services or related to a Product, we will not share your assessment results with other clients without obtaining the appropriate consent.

As a national organization, we have affiliates and subsidiaries around the world. To the extent permitted by law, we may share Personal Information with our affiliates and subsidiaries to provide seamless Services for you and our clients. Hirenomics is responsible for managing jointly used Personal Information.

Hirenomics discloses Personal Information to third parties who provide support for our business operation.

- Hirenomics works with third parties who provide services that may include, but are not limited to, assessment services, including assessment validation services, website hosting and IT consulting services, data analysis, resume verification, background checking, payroll services, public relations services, marketing services, attorneys, accountants, and other administrative and back-up and security services.
- Hirenomics may disclose or transfer all or part of your Personal Information in the event of a sale of our company or one or more of our affiliates. We may also disclose or transfer all or part of your Personal Information in the event of a merger or consolidation involving our

company or one or more of our affiliates. This may also occur if there is a sale or transfer of assets or of any portion of our business or the business of one or more of our affiliates.

There may be other times that we disclose your Personal Information.

- Hirenomics may also use or disclose Personal Information (to comply with a legal obligation or because we have legitimate interest to do so) to: (i) comply with applicable laws, (ii) respond to inquiries, requests or orders from public or government authorities, including those outside of your country of residence, or (iii) protect the rights, privacy, safety or property, of Hirenomics and our affiliates, you or others.
- We cannot and do not assume any responsibility for the actions or omissions of third parties, such as clients, including the way they use Personal Information received either from Hirenomics or from other independent sources.

### **OTHER INFORMATION WE COLLECT**

Hirenomics collects other information that does not reveal your specific identity (“Other Information”), such as:

- Information collected through cookies, pixel tags, and other technologies,
- App usage data,
- Demographic information and other information provided by you, and
- Aggregated information.

Because Other Information does not reveal your specific identity, we may use it for any purpose. If we combine Other Information with Personal Information that identifies you directly (like combining your name with your location), we will treat the combined information as Personal Information for as long as it is combined.

If we are required to treat Other Information as Personal Information under applicable law, we may use and disclose it for the purposes for which we use and disclose your Personal Information as detailed in this Policy.

We and our third-party service providers may collect Other Information in a variety of ways.

We use “cookies” (small text files placed on a visitor’s computer hard drive) and other similar technologies to help us determine information like the type of content a visitor to the Site consumes, and the length of time each visitor spends at any area of the Site. Cookies and similar technologies enhance your experience on the Site. Please see Hirenomics’s cookie policy here for more information about our use of cookies. (Bev this is the example from KF as to how it works. Just put our cookie language in here. Not KF)

You can configure your browser settings to automatically decline cookies or be given the choice of declining or accepting the transfer to your computer of a particular cookie(s) from a particular site. If you disable cookies and similar technologies, your experience on the Site may be diminished and some features may not work as intended.

## CHOICE AND ACCESS

Your provision of Personal Information to us is voluntary, although if you do not provide certain Personal Information you may not be able to participate in our Recruitment Services.

Contact us [admin@hirenomics.com](mailto:admin@hirenomics.com) if you would like to:

- ask questions about how we handle your Personal Information,
- withdraw your consent to our use of your Personal Information,
- object to our use of your Personal Information for our legitimate business interests, or
- request an electronic copy of your Personal Information for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law),
- request to review, correct, update, suppress or restrict the use of your Personal Information,
- To review, correct, update, suppress or restrict the use of your Personal Information, please include all relevant User IDs and e-mail addresses as well as the names of any Hirenomics or Hirenomics -related sites you may have accessed in your communication.
- Although we strive to maintain accurate Personal Information, if it is determined the Personal Information is not accurate, we will work quickly to correct it.

Request that your Personal Information be removed from Hirenomics 's databases,

- To remove your Personal Information from Hirenomics 's databases, please include all relevant User IDs and e-mail addresses as well as the names of any Hirenomics or Hirenomics -related sites you may have accessed in your communication to [admin@hirenomics.com](mailto:admin@hirenomics.com)

Hirenomics will make reasonable attempts to delete Personal Information upon your request.

- Please note that to maintain consistency in our Recruiting Services and operations, we retain backup systems. When you ask that your information be removed from Hirenomics 's databases, we may not be able to delete residual copies from our systems or from our backup systems, but they will continue to be protected as required under this Policy.

If you would like to opt-out of receiving marketing communications from us, please contact us at [admin@hirenomics.com](mailto:admin@hirenomics.com) to have your contact information removed from our marketing databases.

- If you request to have your information removed from our marketing databases through an email request, please include "Remove User" in the subject line of the e-mail, and include your full name, User ID, and telephone number in the body of the e-mail message.
- You can also forward a copy of the e-mail or marketing communications from which you want to opt-out.
- We will respond to your request consistent with applicable law. We may decline to process requests that in our reasonable opinion may jeopardize the privacy of others or put our intellectual property at risk.

- Please note that when we perform Recruitment Services at the specific request of our client, your request may need to be directed to that client. We may only be able to provide you with a non-confidential summary of our final assessment report because these reports contain confidential client personal information that we are not allowed to disclose.
- For your protection, we may only implement requests with respect to the Personal Information associated with the email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will comply with your request as soon as reasonably practical and may need to contact you to be sure that we understand your request.
- We also may need to retain certain Personal Information about you such as your e-mail address to honor opt-out or similar requests. Please keep in mind that this residual Personal Information will remain within Hirenomics databases, access logs, and other records, which may or may not contain identifiable Personal Information about you. The residual Personal Information will not be used for commercial purposes. However, Hirenomics reserves the right, from time to time, to recontact former users of its Services as appropriate.

#### **LOCATION OF PERSONAL INFORMATION COLLECTED AND MAINTAINED**

Your Personal Information may be collected, used, processed, disclosed, and transferred to and within the United States. By using our Online Systems, Services, you understand that your Personal Information may be transferred to cities and states outside of your residence, which may have different data protection rules.

#### **SECURITY**

Hirenomics has reasonable organizational, technical, and administrative measures in place to protect against the loss, misuse, and alteration of Personal Information about users of the Online Systems which is under our control. Unfortunately, however, no security system, or system of transmitting information over the Internet can be guaranteed to be 100% secure.

- If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised or your user credentials are no longer secure), please immediately notify us of the problem by contacting us at [admin@hirenomics.com](mailto:admin@hirenomics.com)

#### **RETENTION PERIOD**

We retain your Personal Information for as long as needed or permitted considering the purpose(s) for which it was obtained.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you or our client (e.g., for as long as you have an account with us or keep using the Services),
- A period beyond the time of the ongoing relationship if we have a legitimate internal operations need, such as a need to retain such information for analysis, record-keeping, and compliance with data retention schedules,

- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period before we can delete them), or
- Whether retention is advisable considering our legal position (such as regarding applicable statutes of limitations, litigation, or regulatory investigations).

### **LINKS TO OTHER WEBSITES**

This Policy does not address, and we are not responsible for, the privacy, information, or other practices of any other third parties.

- On the Online Systems, you may have the opportunity to follow a link from or to other websites maintained by Hirenomics affiliates, or other third parties. The inclusion of a link on our Online Systems does not imply our endorsement of the linked site. Because these other websites may not be hosted or controlled by Hirenomics, this Policy does not address the privacy practices of those websites. We encourage you to review the privacy policies of each of those websites.
- Please note that we are not responsible for the collection, usage, and disclosure policies and practices (including the data security practices) of other organizations, such as LinkedIn, Facebook, Apple, Google, Microsoft or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including any Personal Information you disclose to other organizations through or in connection with the Apps or our Social Media Pages.

### **UPDATES TO THIS POLICY**

Hirenomics reviews its privacy practices regularly, and those practices are subject to change. You can determine when this Policy was last revised by checking the “Revised Date” legend at the bottom of the Policy. Any changes to the Policy will become effective upon posting of the revised Policy on the Internet, accessible through the Site.

### **USE OF ONLINE SYSTEMS BY CHILDREN**

The Online Systems are not directed to individuals under the age of sixteen (16), and we request that these individuals do not provide their personal information through the Online Systems.

### **SUMMARIES OF POLICY**

This Policy is the sole authorized statement of Hirenomics’ s practices with respect to the online collection of Personal Information through the Online Systems and the usage of Personal Information. Any summaries of this Policy generated by third party software or otherwise (for example, in connection with the “Platform for Privacy Preferences” or “P3P”) have no legal effect, are in no way binding upon Hirenomics, cannot be relied upon in substitute for this Policy, and neither supersede nor modify this Policy.

### **QUESTIONS**

Hirenomics is responsible for collection, use, and disclosure of your Personal Information under this Policy.



Questions regarding this Policy should be directed to Hirenomics at [admin@hirenomics.com](mailto:admin@hirenomics.com) or, if by postal mail, at Hirenomics Inc, 5800 Colfax Ave S, Minneapolis, MN 55419.

## **FOR CALIFORNIA RESIDENTS**

Pursuant to the California Consumer Privacy Act of 2018 (“CCPA”), Hirenomics is providing the following details regarding the categories of Personal Information that we collect, use and disclose about California residents and California residents’ rights.

We collect, and have collected within the preceding 12 months, the following categories of Personal Information, as listed in the CCPA:

- Category A. Identifiers, such as name, contact information, IP address, and other online identifiers.
- Category B. Personal information, as defined in the California customer records law, such as name, contact information, medical information, insurance information, education information, employment information, and government-issued ID numbers.
- Category C. Characteristics of protected classifications under California or federal law, such as age, sex, disability status, primary language, race, citizenship, and marital status, to the extent required or permitted by applicable law.
- Category D. Commercial information, such as transaction information and purchase history.
- Category E. Internet or network activity information, such as browsing history and interactions with our website.
- Category F. Audio, electronic, visual, and similar information, such as photographs or audio and video recordings created in connection with our business activities.
- Category G. Professional or employment-related information, such as work history and prior employer, information relating to references, details of qualifications, skills and experience, human resources data, and data necessary for benefits and related administration services; and
- Category H. Inferences drawn from any of the Personal Information listed above to create a profile about, for example, an individual’s preferences and abilities.

In certain cases, we may qualify as “selling” (as defined by the CCPA) Category G Personal Information. Selling, under CCPA, broadly includes any disclosure of Personal Information to a third party that is not a service provider or is not directed by the individual. Also, sharing information which was gathered from public government records does not qualify as “selling” Personal Information under CCPA. For limited services, Hirenomics may share your Personal Information (specifically your name, title, and employer) with our Clients and in most cases this information is found in public sources.

We have disclosed the following categories of Personal Information, as listed in the CCPA, to third parties for our operational business purposes within the preceding 12 months:

- Category A. Identifiers, such as name, contact information, IP address, and other online identifiers.
- Category B. Personal information, as defined in the California customer records law, such as name, contact information, education information, medical information, insurance information, employment information, and government-issued ID numbers.
- Category C. Characteristics of protected classifications under California or federal law, such as age, sex, disability status, primary language, race, citizenship, and marital status, to the extent required or permitted by applicable law.
- Category D. Commercial information, such as transaction information and purchase history.
- Category E. Internet or network activity information, such as browsing history and interactions with our website.
- Category F. Audio, electronic, visual, and similar information, such as call and video recordings.
- Category G. Professional or employment-related information, such as work history and prior employer, information relating to references, details of qualifications, skills and experience, human resources data, and data necessary for benefits and related administration services; and
- Category H. Inferences drawn from any of the Personal Information listed above to create a profile about, for example, an individual's preferences and abilities.

If you are a California resident, you may request that we:

Disclose to you the following information covering the 12 months preceding your request:

- The categories of Personal Information we collected about you and the categories of sources from which we collected such Personal Information.
- The specific pieces of Personal Information we collected about you.
- The business or commercial purpose for collecting (if applicable) Personal Information about you; and
- The categories of Personal Information about you that we otherwise shared or disclosed, and the categories of third parties with whom we shared or to whom we disclosed such Personal Information (if applicable).
- Delete Personal Information we collected from you.
- Stop the sale of your personal information. For more information on this right, please refer to Hirenomics's at [admin@hirenomics.com](mailto:admin@hirenomics.com) in subject line please write - Delete Personal Information we collected from you.

In most cases, Hirenomics will verify your request by: (1) confirming that you control the email address associated with your Personal Information; and (2) confirming that your description of your interactions with Hirenomics matches our records. If necessary, we may require additional information to verify your

request. If you are making a request on someone else's behalf, you must also submit signed proof of authorization and, if necessary, we may ask for additional information. We will respond to your request consistent with applicable law.

You have the right to be free from unlawful discrimination for exercising your rights under the CCPA.

**Last Updated: March 18, 2021 (California Consumer Privacy Act section updated March 18, 2021).**