Global Privacy Policy

Effective Date: June 25, 2024

Your privacy is important to us and maintaining your trust is our priority. ZipRecruiter, Inc. ("ZipRecruiter," "we," "our," or "us"), respects your privacy and is committed to protecting it through our compliance with this "Global Privacy Policy".

This Global Privacy Policy describes the types of information we may collect from or about you or that you may provide when you visit one of the websites listed below or use our services, and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Global Privacy Policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy here.

Which Website(s) and Specific Privacy Policy Applies to You?

As of the Effective Date stated above, the websites covered by this Global Privacy Policy include: www.ziprecruiter.com, www.ziprecruiter.nz, www.ziprecruiter.nz, www.ziprecruiter.nz, www.ziprecruiter.in, www.ziprecruiter.ie, www.ziprecruiter.

To understand which Website(s) and specific Privacy Policy apply to you, here is a simple guide:

For job seekers:	Applicable Website(s)	Applicable Privacy Policy
Located in the United States or Canada , or persons who are not physically present in any of the countries listed below	www.ziprecruiter.com; and our Affiliated Sites	<u>Click here</u>
Located in Australia	www.ziprecruiter.com.au	<u>Click here</u>
Located in New Zealand	www.ziprecruiter.nz	<u>Click here</u>
Located in India	www.ziprecruiter.in	<u>Click here</u>
Located in the European Economic Area, Switzerland, or the United Kingdom	www.ziprecruiter.co.uk; www.ziprecruiter.de; www.ziprecruiter.ie; and www.ziprecruiter.fr	Click here

For organizations (i.e., not job seekers):	Applicable Website(s)	Applicable Privacy Policy
Located and/or established in the United States or Canada , or in a country not listed below	www.ziprecruiter.com; www.ziprecruiter-investors.com; our Marketplace Services, and Affiliated Sites	<u>Click here</u>
Located and/or established in Australia	www.ziprecruiter.com.au; www.ziprecruiter-investors.com; and_our Marketplace Services	<u>Click here</u>
Located and/or established in New Zealand	www.ziprecruiter.nz; www.ziprecruiter-investors.com; and our Marketplace Services	<u>Click here</u>

For organizations (i.e., not job seekers):	Applicable Website(s)	Applicable Privacy Policy
Located and/or established in India	www.ziprecruiter.in; www.ziprecruiter-investors.com; and_our Marketplace Services	<u>Click here</u>
Located and/or established in the European Economic Area, Switzerland, or the United Kingdom	www.ziprecruiter.co.uk; www.ziprecruiter.de; www.ziprecruiter.ie; www.ziprecruiter.fr; www.ziprecruiter-investors.com; and our Marketplace Services	<u>Click here</u>

Which Services are Covered?

This Global Privacy Policy applies to data we collect through the following mechanisms, which are collectively referred to as the "Services":

- On the ZipRecruiter Website or through a ZipRecruiter mobile application.
- Through email, SMS, chat or other online communications between you and ZipRecruiter.
- When you sign up for ZipRecruiter job alerts on a third-party website where ZipRecruiter is a co-controller with the website operator with respect to such job alert signup.
- When you interact with a ZipRecruiter job search widget and/or banner and/or link contained
 in job advertisements that are located on a third-party website, where the owner of the thirdparty website has hired ZipRecruiter to provide services to the third party and/or your
 interaction brings you to a ZipRecruiter Website.
- When we apply artificial intelligence (AI), including algorithms or machine learning, to help match job seekers and employers.

Capitalized terms that are not defined in this Global Privacy Policy have the meaning given to them in our <u>Terms of Use</u> or in any other contractual document between you and us.

Questions/Contact Us. If you have any questions about which Website or specific Privacy Policy applies to you, or any other questions relating to data protection, please contact us via email or telephone as noted in the <u>How to Contact Us</u> section.

EU-U.S. Data Privacy Framework with UK Extension, and Swiss-U.S. Data Privacy Framework

We are committed to upholding the Data Privacy Framework Principles.

ZipRecruiter complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. ZipRecruiter has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) under the UK Extension to the EU-U.S. DPF. ZipRecruiter has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit https://www.dataprivacyframework.gov/.

ZipRecruiter is responsible for the processing of personal data it receives, under the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and Swiss-U.S. DPF, and subsequently transfers to a third party acting as an agent on its behalf. ZipRecruiter complies with the EU-U.S. DPF Principles and the Swiss-U.S. DPF Principles for all onward transfers of personal data from the EU, UK, and Switzerland, including the onward transfer liability provisions.

The Federal Trade Commission has jurisdiction over ZipRecruiter's compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF. In certain situations, ZipRecruiter may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, ZipRecruiter commits to refer unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF to TRUSTe, an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit https://feedbackform.truste.com/watchdog/request for more information or to file a complaint. These dispute resolution services are provided at no cost to you.

For complaints regarding EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and Swiss-U.S. DPF compliance not resolved by any of the other DPF mechanisms, you have the possibility, under certain conditions, to invoke binding arbitration. Further information can be found on the official <u>DPF website</u>.

Specific Privacy Policy

If you are located in the United States, Canada, Australia, New Zealand, India, or are otherwise outside the EEA/Switzerland/U.K.

This section of the "**Privacy Policy**" applies to the following websites: www.ziprecruiter.com, www.ziprecruiter.in, www.ziprecruite

1. WHO WE ARE

The Website is owned and operated by ZipRecruiter, Inc. ("**ZipRecruiter**"), which provides an online employment marketplace that connects employers to job seekers.

ZipRecruiter, Inc. 604 Arizona Avenue, Santa Monica, California 90401, USA Delaware corporation (File Number 4829724)

2. KEY TERMS

We use certain defined terms that appear in this specific Privacy Policy:

The ZipRecruiter Group	ZipRecruiter, Inc. and its wholly-owned subsidiaries, ZipRecruiter UK Ltd., ZipRecruiter Canada Ltd., and ZipRecruiter Israel Ltd.
Non-Personal Data	Data that is not considered Personal Data under applicable law. We reserve the right to treat data as Personal Data or Non-Personal Data based on the law applicable to the data and the data subject.
Personal Data	Any information or pieces of information that identifies you or could reasonably be used to identify you or your personal device either directly (e.g., your name) or, where required by applicable law indirectly (e.g., through pseudonymised data, such as a unique ID number). This means that Personal Data includes things like email/home addresses, usernames, user generated content, financial information, and health information. It could also include certain Technical Data (defined below) such as unique numerical identifiers like your computer's IP address or your mobile device's MAC address, as well as cookies ("Device IDs"), where required by applicable law
Sensitive Personal Data	Personal Data that is defined or considered as "sensitive" under applicable law, which may include data that reveals racial or ethnic origin, political opinions, religious beliefs, or philosophical beliefs or trade union membership; genetic and biometric data; data concerning health, gender, sex life or sexual orientation.

3. DATA WE COLLECT ABOUT YOU

A. Personal Data

As permitted by applicable law in the country from which you access our Website and use our Services, we may collect, use, store and transfer different kinds of Personal Data about you. The table below

identifies the categories of Personal Data that ZipRecruiter collects, uses, stores, transfers, or otherwise processes:

CATEGORY OF PERSONAL DATA	EXAMPLES OF PERSONAL DATA WE MAY COLLECT UNDER EACH CATEGORY
Identity Data	First name, maiden name, last name, resume/CV, Social Media profile, username or similar identifier, and profile photo
Contact Data	Physical address, email address, social media address, telephone number, and any other contact information you provide to us
Financial Data	Payment card details. However, please note that payment methods (e.g., credit card number and/or PayPal and/or bank account details) are not collected by us directly, but by secure payment service providers
Transaction Data	Details about payments to and from you, and details regarding the services that you have subscribed to or purchased through a ZipRecruiter Website
Technical Data	Device IDs, your login data, access dates and times, browser type and version, device information, cookie data, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Website
Profile Data	Your username and password, orders made by you, preferences, user- generated content, job searches, candidate searches, job applications, feedback and survey responses
Business Information	Job title, company name, company location, number of employees at the company, and other company-level data
Usage Data	Information about how you use our Website, products and services
Marketing and	Your preferences in receiving marketing from us and our third parties and
Communications Data	your communication preferences

B. Non-Personal Data

We also collect, use and share "Aggregated Data" (where data has been combined or collected together in summary or other form that cannot identify an individual) or "De-Identified Data" (where Personal Data points have been removed so that the remaining data cannot reasonably be linked to an identifiable individual) for any purpose. Aggregated Data and De-Identified Data may each be derived from Personal Data but are not considered Personal Data since it does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. We will maintain and use De-Identified Data as permitted in this Privacy Policy without attempting to reidentify it.

C. <u>If You Fail to Provide Personal Data Where Such Data is Required to Provide</u> Services to You

Where we need to collect Personal Data by law, or under the terms of a contract we have with you, or a prospective contract, and you fail to provide that Personal Data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our services). If so, we may have to cancel the service you have with us (or have requested from us), and you accept that as a condition of service.

D. Data That You Should Not Provide to Us

ZipRecruiter does not require any Sensitive Personal Data about you in order for you to utilize the ZipRecruiter Website. If you are submitting your resume to our database or sharing your resume with a prospective employer directly using a job application feature on the ZipRecruiter Website, please carefully consider the information that is contained within your resume and ensure that you are not

providing any sensitive or other information that is not necessary for your job application or job search. Before submitting any information, either in your resume or otherwise to a prospective employer or recruiter, please also review the section entitled "Interactions with Other Users; Scams, Confidentiality" contained in our Terms of Use.

4. HOW DATA IS COLLECTED

We use different methods to collect Personal Data from and about you including, for example:

A. Direct Interaction with Us

You may give us your Identity Data, Contact Data, Financial Data, Profile Data, and other information by filling in forms or by corresponding with us by post, phone, e-mail or otherwise. This includes Personal Data you provide when you:

- sign-up for a free trial
- sign-up for a paid subscription
- create an account on our Website
- request information to be sent to you
- submit your resume/CV to our resume database
- give us feedback
- apply to a job posted on our Website
- sign up for email or SMS job alerts
- authorize ZipRecruiter to connect your account to the account of a "Connected Site" (e.g., Google, LinkedIn, Monster, Facebook or Twitter), we may be able to access information you have provided to the Connected Site, such as profile information, content information, timeline feeds, contact and follow lists, network statistics, and/or updates regarding your Connected Site account

B. <u>Automated Technologies or Interactions.</u>

As you interact with our Website, we may automatically collect Technical Data and Usage Data about your equipment, browsing actions and patterns. We collect this Personal Data and Non-Personal Data by using cookies, server logs and other similar technologies. We may also receive Technical Data and Usage Data about you if you visit other websites employing our cookies and other Tracking Technologies (defined below). For more information regarding our use of Tracking Technologies, please refer to "Cookies and Similar Technologies" below.

C. Third Parties

We may receive Personal Data in the form of Technical Data and Usage Data about you from various third parties, such as analytics providers or advertising networks. If you are a Client, we may receive additional Business Information from third-party sources to supplement the Business Information you provide. For non-users, we may also receive Business Information and Contact Data from third-party sources.

D. <u>ZipRecruiter as a Service Provider (Data Processor)</u>

In certain instances, our clients hire ZipRecruiter to provide services on behalf of the client. In such case, we process Personal Data under the direction of that client (the data controller) and have no direct relationship with the individuals (data subjects) whose Personal Data we process.

Where ZipRecruiter processes your Personal Data in the capacity of a service provider (data processor), and you seek access, or want to correct, amend, or delete your Personal Data, or have other request, we will provide you with the data controller's contact information, so you can contact them directly. In rare instances, however, circumstances may necessitate ZipRecruiter assisting you with your question or request.

For example, some clients hire ZipRecruiter to send job alert emails to their job seekers who have requested job alert emails from such clients. In these cases, ZipRecruiter acts as a service provider (*i.e.*, data processor) to the client, who is the data controller. When ZipRecruiter provides services in the capacity of a service provider, it acts under the instructions and at the direction of such client (*i.e.*, the data controller). In the foregoing example, if you are a job seeker who has requested job alert emails from one of our clients, the client will provide us certain Personal Data about you (such as your name, email address, the type of job you want, and your preferred geographic location) to ensure that the job alert emails meet your search criteria. If you have questions or requests about your Personal Data with respect to the job alert emails, we will provide you with the data controllers contact information so that you can contact the data controller directly.

5. HOW WE USE YOUR DATA

A. Use of Non-Personal Data

Where permitted by applicable law, we may use your Non-Personal Data 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 data collection.

B. Use of Personal Data

We will only use your Personal Data to provide services directly to you (in our capacity as a business/data controller) and/or to provide services to you on behalf of our clients (in our capacity as a service provider/data processor), except as otherwise described in this Privacy Policy or with your consent.

In the table below, we have described (i) in what context your Personal Data was collected, *i.e.*, what activity you were involved in when we collected or used your Personal Data; (ii) the types of Personal Data that we hold about you; (iii) how and why we use your Personal Data; and (iv) the reasons we hold and use your Personal Data. We will amend the table as required. We have also provided you with an explanation of some of the terms we use in this table:

- (a) "User Experience" means our goals in conducting and managing our business, to give you the best user experience when using our Website, products, and Services.
- (b) "Performance of Contract" means processing your Personal Data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- (c) "Comply with a legal or regulatory obligation" means processing your Personal Data where it is necessary for compliance with a legal or regulatory obligation to which we are subject.
- (d) "Consent" means that you consent to our use of your Personal Data for one or more specific purposes. Where we rely on your consent to use your Personal Data, you have the right to withdraw that consent at any time. You can do this by contacting us at dsars@ziprecruiter.com. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to

provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

CONTEXT IN WHICH YOUR PERSONAL DATA IS COLLECTED	WHAT CATEGORIES OF PERSONAL DATA WE MAY HOLD ABOUT YOU	HOW WE MAY USE YOUR PERSONAL DATA	THE REASONS WE PROCESS YOUR PERSONAL DATA
Account Creation and Management	 Identity Data Contact Data Billing Data Financial Data Trechnical Data Profile Data Business Information Other information you have shared with us about yourself (e.g., via your "My Account" page), by contacting us, or a question via the chat function 	 To create and manage your account To communicate with you about your account, and process your order To manage our relationship with you To offer you personalized services based on your preferences To respond to your questions To send you email and/or SMS job alerts if you registered to receive such job alerts To send you marketing communications (where you have asked us to) which may be tailored to your "profile" (i.e. based on the Personal Data we know about you and your preferences) To manage payments, fees and charges. Please note that payment methods (e.g., credit card number and/or PayPal and/or bank account details) are not collected by us directly, but by secure payment service providers To collect monies owed to us To run analytics or collect statistics To manage any surveys, promotions or competitions you entered To communicate with you regarding our services 	 To perform our contract with you so you can create your account and use our Services To optimize your user experience to (i) improve our Services; (ii) better engage with you; (iii) mitigate or prevent fraud; and (iv) secure our tools Consent – so you can receive job alert emails or marketing communications
Newsletter and Marketing Communications	 Identity Data Contact Data Profile Data Business Information Marketing and Communications Data Other information you have shared with us about yourself (e.g., via your "My Account" page), by contacting us, or a 	To send you marketing communications (where you have asked us to) which may be tailored to your "profile" based on the Personal Data we know or learn about you and your preferences To send you newsletters where you have indicated an interest or shown an interest based on your	 To optimize your user experience and provide you with information about ZipRecruiter products and services that may be of interest to you Consent (where required by applicable law) – so you can receive newsletters, and information about

CONTEXT IN WHICH YOUR PERSONAL DATA IS COLLECTED	WHAT CATEGORIES OF PERSONAL DATA WE MAY HOLD ABOUT YOU	HOW WE MAY USE YOUR PERSONAL DATA	THE REASONS WE PROCESS YOUR PERSONAL DATA
	question via the chat function	preferences as shown by your activity on the Website and/or your profile To keep your Contact data on a suppression list if you've indicated you don't want to be communicated in a particular way To run analytics or collect statistics To identify business prospects and send marketing materials where permissible by law	products and services that may be of interest to you
Purchases, Subscriptions, and/or Order Management	Identity Data Contact Data Billing Data Financial Data Technical Data Transaction Data Profile Data Business Information Other information you have shared with us about yourself (e.g., via your "My Account" page), by contacting us, or a question via the chat function	 To process your order for a subscription or other purchased products or services To manage payment. Please note that your payment information (credit card number/PayPal/bank account details) are not collected by us directly, but by secure payment service providers To communicate with you regarding your subscription or purchase To secure your transaction against fraud. We may use a third-party provider's solution to detect fraud and make sure that payment is completed To update your transaction history in your account profile To perform invoicing, debt collections, or manage payment disputes or issues with the services To run analytics or collect 	 The performance of a contract – so you can make purchases and we can manage the associated logistics To optimize your user experience, including but not limited to: (i) improving our products and services; and (ii) preventing fraud To comply with a legal obligation – to keep information we are required to, e.g., to comply with our tax and financial reporting obligations with respect to monies you have paid us
Website Administration	Identity Data Contact Data Business Information Technical Data	 statistics. To provide administration and IT services, network security, to prevent fraud To troubleshoot To perform data analysis, testing, system maintenance, support, reporting and hosting of data To run analytics or collect statistics To monitor and improve our website 	To optimize your user experience when using our Website and the services and products provided through the Website To perform our contract with you and provide services to you

CONTEXT IN WHICH YOUR PERSONAL DATA IS COLLECTED	WHAT CATEGORIES OF PERSONAL DATA WE MAY HOLD ABOUT YOU	HOW WE MAY USE YOUR PERSONAL DATA	THE REASONS WE PROCESS YOUR PERSONAL DATA
Use of Website/Mobile Apps	Identity Data Contact Data Usage Data Profile Data Business Information Technical Data Transaction Data	 To provide you with the service(s) you requested such as sending your job application, sending you resumes, posting your job ad, providing you with products that you've requested, notifying you when your resume has been viewed To analyse your preferences and tailor content To monitor and improve our apps and devices To run analytics and statistics. 	 To provide you with the service(s) you have requested on the devices that you are using to access our Services To optimize your user experience based on the devices you use to access our Services. To improve our Website, Services, and your user experience
Online Browsing Where your Personal Data may be collected by cookies or similar technologies and data analytics	Usage Data such as where you came from; login details; pages you looked at; duration of your visit; specifics of the services and products you purchased; jobs that you applied to; jobs that you opened; candidate resumes that you viewed; type of jobs you posted; location of jobs Technical Data such as your IP address; browser information; device information; and/or your unique ID and the expiration date of the ID Identity Data Transaction Data Profile Data Business Information	 To improve our Website, products/services and your user experience To run analytics and collect statistics To enable our Website to function properly (ensure proper display of content); create and remember your account login details; interface personalization, such as language, or any user-interface customization (i.e. parameters attached to your device including your screen resolution or font preference), etc. To understand how you arrived at our Website We use information derived from cookies together with other Personal Data that you have already shared with us to deliver you information about employment opportunities that may interest you based on the job searches you made on the Website, jobs you applied to or email alerts you signed up for; candidates that may interest you based upon the job ad you posted; the resumes/CVs you viewed To customize our Services for you based upon your activity on the Website, your preferences for certain skillsets or certain jobs 	To enhance your user experience based on the device you use to access our Services and the choices you have made, to save your personal settings or preferences Consent, when required by applicable law and/or the choices you have made, to store cookies on your device

CONTEXT IN WHICH YOUR PERSONAL DATA IS COLLECTED	WHAT CATEGORIES OF PERSONAL DATA WE MAY HOLD ABOUT YOU	HOW WE MAY USE YOUR PERSONAL DATA	THE REASONS WE PROCESS YOUR PERSONAL DATA
		 To ensure the proper display of content, including redirecting you to your local ZipRecruiter website where appropriate; to remember your preferences, login and account details, and to improve our websites/apps, for example, by testing new ideas, features, layouts To ensure our websites/apps are secure and safe, and to protect you against fraud or misuse of our websites/apps or services To run data analytics and collect statistics 	
Promotions Where your Personal Data was collected during a promotion, contest survey or feedback	 Identity Data Contact Data Technical Data Usage Data Profile Data Business Information 	To receive your contest entry, manage your participation in the promotion, take account of your feedback To run analytics and statistics To send you candidates, jobs or information and products and services that may interest you based on your feedback and suggestions	 The performance of a contract – so you may enter into a promotion, receive notification of results, notification of a prize, and/or any other communications related to the promotion To manage your responses, reply to your feedback, and communicate with you regarding any recommendations and/or new features or functionality based on your feedback or survey.
User-Generated Content Such as profile, resumes/CVs, job ads, ratings	Identity Data Contact Data Usage Data Profile Data Business Information Transaction Data Technical Data	 To send your resume/CV to the employer whose job ad you applied to or to send you resumes of candidates that appear to have the skill set in your job ad To run analytics and statistics To add the resumes/CV you've viewed or the jobs that you've applied for, to your account and profile To add your resume/CV to the 'Resume Database', if you've opted-in on a Website To help you build your profile during account creation and suggest jobs to you based on your profile and/or resume To use portions of your 	To provide you with the Services you have requested, including, but not limited to, adding your resume/CV to our resume/CV database, posting your job ad on our Website, facilitating your job application, and/or distributing your content in accordance with any contract we have with you To improve our Website, Services, and your user experience

CONTEXT IN WHICH YOUR PERSONAL DATA IS COLLECTED	WHAT CATEGORIES OF PERSONAL DATA WE MAY HOLD ABOUT YOU	HOW WE MAY USE YOUR PERSONAL DATA	THE REASONS WE PROCESS YOUR PERSONAL DATA
Enquiries and Messaging Initiated by You Where your Personal Data is collected when you ask questions relating to our services and/or your account	Identity Data Contact Data Profile Data Business Information Transaction Data Technical Data Usage such as content of chats, messages, or enquiries; number of messages you've sent and received; when you viewed a message; who responded to your chats	profile, resume/CV, and/or job ads for internal purposes, including to help improve our matching and algorithms. To answer and manage your enquiries To run analytics and statistics To add your questions or concerns to your profile so we can understand your interests and preferences To troubleshoot any problems that you are experiencing We also may use automatic scanning technology on messages to allow us to recognize patterns on our messaging platform to make your professional communications more efficient and informed and contribute to a safer and more secure job search experience or check links shared in messages for malicious sites and looks for blacklisted keywords to detect spam and fraud.	In order to respond to your enquiries Where we need to comply with a legal, regulatory, or contractual obligation and/or where we need to communicate with you regarding your use of our products and/or Services

6. HOW WE SHARE OR DISCLOSE YOUR DATA

We require all third parties to respect the security of your Personal Data and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Data for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with our instructions and this Privacy Policy. Below we explain in more detail how ZipRecruiter shares or discloses your Personal Data outside of ZipRecruiter.

A. <u>Disclosures of Personal Data at Your Direction</u>

We disclose your Personal Data when you intentionally interact with third parties and when you direct us or intentionally use ZipRecruiter to share your Personal Data in connection with the services that we provide to you. For example:

- If you are a job seeker, we will share your Personal Data as follows:
 - o If you apply to a job posting on our Website, we will share your Identity Data and Contact Data with the prospective employer and/or their agent of the job to which you applied, including but not limited to, any external Applicant Tracking System or any other external system used by the direct employer to manage the hiring of employees or other categories of workers.

- o If you have opted-in to our Resume Database (where such feature is available), we will share your Identity Data and Contact Data with prospective employers, recruiters, and/or their agents or representative that are permitted to have access to the Resume Database. You can opt-out of your information being available in our Resume Database at any time by updating this preference on the My Profile tab of your Job Seeker account. However, if an entity has already accessed your Identity Data or Contact Data through the Resume Database or via the search results, and copied or otherwise saved your information prior to you opting-out, that entity will continue to have access to the information that was previously saved.
- If you are invited to and choose to participate in a video call with a Client ("Video Intro"), your Identity Data and Contact Data will be shared with the employer that invited you to the call.
- For any other purpose authorized by you when you provide us with the information or otherwise choose to participate in new features and functions available through the Services.

<u>Please Note:</u> Please ensure that the profile information and resume associated with your account is up-to-date, so when you apply for a job vacancy or participate in a Video Intro call through a ZipRecruiter Website, the employer receives your most recent resume and/or profile information. When you apply to a job vacancy using the "Apply Now" button, you will be given the option to use the resume saved to your profile or use a different resume before submitting the application. If you apply to a job using "1-Click Apply", ZipRecruiter will automatically send the existing resume in your account. If you want to send a different resume, please replace the resume currently in your account before you use the "1-Click Apply" feature. You will have an account with ZipRecruiter if you opened an account yourself, signed up for job alerts, applied for a job on the ZipRecruiter website and/or when you 'verify skills' for another user. You can delete or replace your resume by going to the 'Profile' settings in your account. If you would like to change the resume you used to apply to a previous job posting, you can go to the "Applied Jobs" page in your ZipRecruiter account, and click "Replace Resume" to replace the resume used to apply to a particular job vacancy.

- If you are a Client, we will share your Personal Data as follows:
 - o If you invite job seekers to participate in a Video Intro call, your Identity Data and Business Information will be shared with the job seekers that are invited to the call.
 - If you authorize ZipRecruiter to send automated personalized invitations or other communications to candidates on your behalf, your Identity Data and Business Information will be shared with candidates that are invited to connect with you and/or apply to your job.
 - For any other purpose authorized by you when you provide us with the information or otherwise choose to participate in new features and functions available through the Services.

B. <u>Disclosures of Personal Data for a Business Need or Other Purpose</u>

We describe in detail below how ZipRecruiter may share or disclose Personal Data with third parties:

Internal Parties

• With the ZipRecruiter Group: We may disclose your Personal Data to companies within our corporate family that comprise the ZipRecruiter Group. Access to your Personal Data will be

controlled and only granted where necessary to provide our services to you and/or to allow us to perform any necessary or legitimate functions.

External Third-Parties

- Service Providers, vendors, and contractors: We may disclose your Personal Data to service providers, vendors, or independent contractors that we use to support our business and/or help provide our services to you, including, but not limited to, third-parties that host our Website, assist us to verify your identity, perform website and platform maintenance, risk assessments, and security, perform data and web analytics, provide databases, IT services, customer service, payment platforms and credit card processing, communication services, and email services. These parties may be located in the United States and/or other countries (see section below entitled "Where Your Data is Transferred").
- Advertising partners or advertising networks: We may disclose certain Personal Data about you that is collected through cookies and other tracking technologies with third party advertising partners, advertising networks, publishers, or similar so that we can help target ZipRecruiter advertisements, personalize advertising content, measure the effectiveness of our ads, auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, measuring ad performance, conducting ad fraud detection, recording on ad viewability, and auditing compliance, and carry out similar advertising functions. Please see our Cookie Policy for more information.
- Professional advisors: We may disclose your Personal Data to professional advisers, such as lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance, financial, auditing, and accounting services to us so we can operate our business.
- Third Parties for a Specific Business Purpose: We may disclose Personal Data to carry out specific business purposes. For example:
 - Fraud prevention and identity verification services where we believe that disclosure is necessary or appropriate to protect the rights, property, or safety of ZipRecruiter, our customers or others. This includes exchanging information with third-parties for the purposes of fraud detection and prevention and credit risk reduction.
 - To enforce our <u>Terms of Use</u> and other agreements with you, to respond to, and defend ourselves against, claims asserted against us, to protect the rights, property, or safety of ZipRecruiter, our services, customers or others, or to investigate, prevent, or take action regarding suspected or actual illegal activities or for debt collection.
 - Upon your authorization, the Services may also post information directly to the timeline of your Connected Site Account.
 - From time to time, we may run contests, special offers, or other events or activities ("Events") on our Services together with a third-party partner. If you provide information to such third parties, you give them permission to use it for the purpose of that Event and any other use that you approve. We cannot control third parties' use of your information. If you do not want your information to be collected by or shared with a third party, you can choose not to participate in these Events.
 - o For any other purpose disclosed by us when you provide the information.
- Third Parties for Purposes of a Business Transfer: We may disclose Personal Data in connection with or during negotiations of any proposed or actual financing, merger, purchase, sale, sale or transfer of some or all of our assets or stock, joint venture, or any other type of financing, acquisition or business combination of our company(ies), or all or any portion of our assets, or transfer of all or a portion of our business to another company, including

without limitation in the event of a divestiture, restructuring, reorganization, dissolution or other event, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding. In the event of a merger, divestiture, restructuring, reorganization, or other sale or transfer of some or all of our assets or stock, Personal Data that we hold about our clients and users of our services will be one of the assets that will be transferred. If a change happens to our business, the new owners may only use your Personal Data in accordance with this Privacy Policy.

- Third Parties with Your Consent: We may disclose Personal Data to third parties, where you have expressly consented to the disclosure of your Personal Data.
- Government Entities: We may disclose Personal Data to law enforcement agencies, courts, supervisory authorities, regulatory bodies and certain other third-parties, to the extent that we are permitted or required to do so by law, or in order to comply with our legal and regulatory obligations, or in the interests of national security, or to respond to verified requests relating to a criminal investigation or alleged or suspected illegal activity. This may also include taxing authorities, such as the Internal Revenue Service and other authorities acting as processors based in the United States, the United Kingdom, and other applicable countries, who require reporting of processing activities in certain circumstances.

The table below identifies which categories of Personal Data may be disclosed to the third parties described above.

Category of Personal Data Disclosed	Categories of Third Parties
Identity Data, Contact Data, Transaction Data, Technical Data, Profile Data, Business Information, Usage Data, and Marketing and Communications Data	 ZipRecruiter Group Service providers, vendors, contractors Advertising partners or advertising networks Professional advertisers Third parties for a specific business purpose Third parties for purposes of a business transfer Third parties with your consent Government entities
Financial Data	 ZipRecruiter Group Service providers, vendors, contractors Professional advertisers Third parties for a specific business purpose Third parties for purposes of a business transfer Third parties with your consent Government entities

C. Non-Personal Data

Where permitted by applicable law, we may share your Non-Personal Data 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 data collection.

D. Sale of Personal Data or Use for Targeted Advertising

Your privacy is our priority, and we do not monetize your Personal Data by selling it to third parties.

After you visit our Website and/or use our Services, you may receive targeted advertisements about ZipRecruiter when you visit other websites (i.e., social media sites, search engines or other websites that are unrelated to ZipRecruiter) (collectively, "Other Websites"). This happens because we use third-party vendors to provide you with information about our Services based upon your interactions

with our Website. We also may place third-party cookies and other tracking technologies on our Website to track your interactions with ZipRecruiter ads placed on Other Websites.

These third-party vendors may additionally collect certain Personal Data about you through cookies and other tracking technologies (see our <u>Cookie Policy</u> for more information). These third-party vendors may work with additional downstream providers in their relationship network that assist the third-party vendor in providing the advertising services to us. When this information is disclosed by ZipRecruiter in the manner described above, it may constitute a "sale" or "use for targeted advertising" under applicable privacy laws. We disclose the following categories of Personal Data with third party advertising partners or advertising networks for the purpose of showing you ads about ZipRecruiter Services:

- Identity Data
- Contact Data
- Transaction Data
- Business Information
- Profile Data

7. WHERE YOUR DATA IS TRANSFERRED

ZipRecruiter, Inc. is headquartered in the United States of America (USA). The information that you provide or that we collect as a result of your interaction with the Website and/or your use of our Services is transferred to the USA and/or to another country where we have a subsidiary or where we have engaged service providers. As a result, your Personal Data may be subject to data protection and other laws that may differ from your country of residence. Your Personal Data may be disclosed in response to inquiries or requests from governmental or regulatory authorities in the countries in which we and/or our service providers operate.

8. HOW LONG YOUR DATA WILL BE KEPT

Different retention periods apply for different types of Personal Data and in determining the appropriate retention period, we consider several criteria, including, but not limited to, the purpose for which we hold your Personal Data, our legal, accounting, reporting and/or regulatory obligations in relation to that Personal Data (e.g., financial or tax reporting obligations), whether our relationship with you is ongoing (e.g., where you use more than one of our products and/or services), any specific request you may have made in relation to the deletion of your Personal Data, or where we have a legitimate interest in relation to the management of our own rights (e.g., the defense of any claims). In some circumstances we may anonymize your Personal Data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Once you no longer have a relationship with us, we will retain or securely delete or destroy your Personal Data subject to the foregoing and in accordance with applicable laws and regulations. If you request to receive no further contact from us, we will keep some basic information about you on our suppression list in order to avoid sending you unwanted materials in the future.

9. YOUR DATA SUBJECT ACCESS RIGHTS

We respect your privacy rights and provide you with reasonable access and rights to the Personal Data that you may have provided through your use of the Services, in accordance with applicable law.

A. Data Subject Rights

Depending on applicable law, you may have the following rights with respect to your Personal Data:

YOUR RIGHTS	WHAT CAN YOU REQUEST
Right to	The right to know whether we process Personal Data about you and, if so, what
Information	Personal Data we hold about you and how we use it.
Right of Access	The right to be provided with a copy of your Personal Data (subject to certain
	restrictions under applicable law).
Right to Delete	The right to request that we delete your Personal Data (subject to certain
	restrictions under applicable law).
Right of	The right to require us to correct any incomplete or inaccurate Personal Data we
Rectification/	hold about you, though we may need to verify the accuracy of the new data you
Correction	provide to us. If you have a user account with us, you also have the option of
	correcting your information directly in your account.
Right to	You have the right to withdraw your consent at any time where we are relying on
Withdraw	consent to process your Personal Data. However, this will not affect the lawfulness
Consent at	of any processing carried out before you withdraw your consent. If you withdraw
Any Time	your consent, we may not be able to provide certain products or services to you.
	We will advise you if this is the case at the time you withdraw your consent.
Right to Opt -	You have the right to opt-out of the sales of your Personal Data or the processing of
Out of	your Personal Data for purposes of targeted advertising. To submit an opt-out
Sale/Targeted	request, you (or your authorized representative) may visit our Notice of Right to
Advertising	Opt-Out page.

If you have any complaints about how ZipRecruiter handles Personal Data, please send an email to dsars@ziprecruiter.com, and identify the specific website to which your request relates. We welcome the opportunity to help you with any concern or questions you may have about the use of our services, and we will respond to your request within a reasonable timeframe.

For residents located in Nevada: Nevada residents who wish to exercise their sale opt-out rights under Nevada Revised Statutes Chapter 603A may submit a request to this designated address: dsars@ziprecruiter.com. However, please know ZipRecruiter does not currently sell data triggering the opt-out requirements under Nevada Revised Statutes Chapter 603A.

For residents located in certain U.S. states: If required under applicable state privacy law, you may also have the right to: (i) opt out of processing of Personal Data for purposes of profiling in furtherance of decisions that produce legal or similarly significant effects (if such profiling occurs); (ii) request a list of third parties with whom we have disclosed personal data; and (iii) appeal any decision by ZipRecruiter, including a decision not to take an action relating to your applicable rights, by sending an email to dsars@ziprecruiter.com.

For data subjects located in 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 ZipRecruiter's policies and practices with respect to its non-Canadian service providers by sending an email to dsars@ziprecruiter.com. A member of our Data Subject Response Team will respond to any such request.

For data subjects located in Australia: We comply with the Australian Privacy Principles ("APPs"), which regulate how we collect, use, disclose, store, correct and protect your Personal Data. If you are not satisfied with how we have handled your matter, you may wish to contact the Office of the Australian Information Commissioner.

For data subjects located in New Zealand: If you are not satisfied with how we have handled your matter, you may wish to contact the <u>Office of the Privacy Commissioner of New Zealand</u>.

Method for Requesting Information Pursuant to Your Rights

If you would like to exercise any of the data subject access rights in the table above (each, a "Rights Request") please send an email to <u>dsars@ziprecruiter.com</u> with your specific request and identify the specific website to which your request relates. We will respond to your request within a reasonable timeframe.

No Fee Usually Required

You will not usually be required to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances and, in such case, we will notify you within a reasonable timeframe regarding our reasons for refusing to act on your request.

What We May Need from You

Once we receive your Rights Request, we may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it.

If we are not clear as to what you are requesting, we may also need to contact you for clarification so we can more fully respond to your request.

If we cannot locate any records about you, we may also ask you for additional information to assist us in locating records, if they exist.

Using an Authorized Agent: If you are using an authorized agent to submit a Rights Request (where permitted by applicable law), the authorized agent must provide documentation or other proof indicating that they are authorized to act on your behalf. For requests to correct, access or delete, we may require you to verify your identity directly with us (for example, by emailing us directly from the email address associated with your user account), and directly confirm with us that you provided the authorized agent permission to submit the Rights Request. If you are an authorized agent, you may make a request by emailing dsars@ziprecruiter.com and providing documentation or other proof indicating that you are authorized by the data subject to act on their behalf. The agent must provide documentation necessary (as determined in ZipRecruiter's discretion) to verify the agent has authority to act on the data subject's behalf as required by applicable law.

Time Limit to Respond

We try to respond to all legitimate requests within the timeframes required under applicable law. Occasionally it may take us longer than the time period required under applicable law if your request is particularly complex or you have made a number of requests. In this case, we will notify you as to the reason for the delay.

B. Deleting Your Account

If you would like to delete your account, you may log in to your Account Setting on the Website and click "Delete Account" or you can send an email to dsars@ziprecruiter.com asking for your account to

be deleted. If you close or delete your account, we may still retain certain information for analytical purposes and recordkeeping integrity, as well as to prevent fraud, resolve disputes, enforce our Terms of Use or other policies, take actions we deem necessary due to technical and legal requirements, and as dictated by constraints related to the security, integrity and operation of our Services.

10. CALIFORNIA PRIVACY RIGHTS

California residents have the right to request certain information regarding our disclosure of personal information (as defined by the California Shine the Light Act) to third parties for their direct marketing purposes unless we provide them with an ability to exercise choice regarding such disclosures. We comply with this law by providing California residents with the ability to opt-out of, or prospectively withdraw their consent, if they have previously opted-in to, the disclosure of Personal Data to third parties for their direct marketing purposes. If you are a California resident, to receive confirmation of how we comply with this law, or to make a request or to opt out at any time, please contact us at dsars@ziprecruiter.com or mail us at the address provided in Section 20 below. Any request must include "California Privacy Rights Request" in the first line of the description and must include the requestor's name, street address, city, state, and ZIP code.

California Privacy Notice:

If you are a visitor or user of ZipRecruiter.com or our <u>Affiliated Sites</u>, who resides in the State of California, you can view our "California Privacy Notice" by clicking <u>here</u>.

11. MARKETING

We may use your Personal Data to send you information about the services provided by the ZipRecruiter Group; provided, however, that we will obtain consent to do so where required by applicable law. You may unsubscribe from our marketing e-mails by clicking "Unsubscribe" in any promotional e-mail communications we send you. As permitted by applicable law, you cannot opt-out of non-marketing, services-related notices.

12. COOKIES AND TRACKING TECHNOLOGIES

ZipRecruiter and third parties may use cookies or similar tracking technologies (e.g., pixels, beacons, scripts, etc.) ("Tracking Technologies") to analyze trends, administer the Website, track users' movements around the Website, gather demographic information about our user base as a whole, display advertising on our Websites, or manage our advertising on other sites. You can control the use of cookies at the individual browser level or via our cookie consent manager on the Website (where available), but if you choose to disable cookies, it may limit your use of certain features or functions on our website or service. For more information about the types of cookies and Tracking Technologies that we, and certain third parties use, and why we use them, and how you can control these, please review our Cookie Policy.

If you are accessing the Website from a location outside the EEA, U.K., or Canada, you understand that we apply U.S. law and the U.S. advertising industry self-regulatory program to Tracking Technologies associated with the Website.

We partner with third parties to either display advertising on our websites or to manage our advertising on other sites. Our third-party partners may use cookies or similar technologies in order to provide you advertising based upon your browsing activities and interests. If you wish to opt out of any interest-based advertising, <u>click here</u>. Please note that you will continue to receive generic ads.

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 the website from which the application was downloaded.

We use email pixels to track whether our marketing emails are opened so that we can understand the effectiveness of our email marketing campaigns. If you wish to block email pixels, you will need to use the function offered by most email providers which prevents your emails from automatically loading images.

To the extent permitted by applicable law, we may 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.

13. DATA SECURITY

We use appropriate technical and organizational measures to protect Personal Data we process about you.

However, no transmission of information via the Internet or wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your Personal Data, you acknowledge that there are security and privacy limitations of the Internet which are beyond our control and accordingly, the security, integrity and privacy of data exchanged between you and us through the Website cannot be guaranteed.

We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

The safety and security of your Personal Data also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your login or account credentials with anyone and keep your account information secure. We urge you to be careful about giving out information in public areas of the Website like message boards, where information will be available to other users of the Website. If you believe that your access credentials or Personal Data have been compromised, please contact us immediately.

14. LINKS TO THIRD-PARTY WEBSITES AND SOCIAL MEDIA FEATURES

Our Website may from time to time, contain links to third-party services such as websites, locations, platforms, applications or services operated by third parties. If you follow a link to or otherwise access any of these third-party services, these third-party services may use their own cookies, web beacons, and other Tracking Technology to independently collect information about you and may solicit Personal Data from you. Please note that these third-party services have their own privacy policies and we do not accept any responsibility or liability for these parties' policies or practices. Please check these policies before you share any Personal Data with these third-party services.

We may offer you the opportunity to use your social media login when interacting with our Website. If you do so, please be aware that you may be sharing your profile information with us. The Personal Data that is shared will depend on your social media platform settings. Please visit the relevant social

media platform and review its privacy policy to understand how your Personal Data is shared and used in this context.

Social media features may also collect your IP address, which page you are visiting on our Website, and may set a cookie or other Tracking Technologies to enable the applicable social media feature to function properly. Your interactions with these features are governed by the privacy policy of the company providing such features.

The Website may include tools provided by us or third-party services that enable you to send a message to another person. If you use any such tools, please ensure that you only send messages to persons to whom you have permission to send messages. Absent the recipient's consent, we will only use their Personal Data that you provide us to facilitate such messages.

15. PUBLIC FORUMS

You should be aware that when you voluntarily disclose any Personal Data in a public forum on the Website, this information, along with any information disclosed in your communication, can be collected and used by third parties and may result in unsolicited messages from third parties. Such activities are beyond our control and this Privacy Policy does not apply to such information. You accept that you, and not ZipRecruiter, are responsible for providing such information in any public forum. Any submissions to public areas on the Website are accepted by you with the understanding that such forums are accessible to all third parties. If you do not want your comments or any content to be viewed by third parties, you are advised not to make any submissions. Please be careful and responsible whenever you're online.

16. INVITATION SERVICE

If you choose to use our invitation service to invite a friend to our Services, we provide you with a link to copy and paste to share with your friends, or spread the word on LinkedIn, Facebook or Twitter. We provide you with a unique link ID so that you earn credit for each friend that joins the site by following your link. Your friend may contact us to request that we remove this information from our database at dsars@ziprecruiter.com.

If you wish to invite a friend to view our blog posts, we will ask you for that person's email address and automatically send an email invitation. ZipRecruiter stores this information to send this email, to register your friend if your invitation is accepted, and to track the success of our invitation service. Your friend may contact us to request that we remove this information from our database at dsars@ziprecruiter.com.

17. QUESTIONS OR COMPLAINTS

If you have a complaint, or if you have any questions or requests regarding your Personal Data, please email us at dsars@ziprecruiter.com, and specify the country in which you are located and the website to which your request relates. We welcome the opportunity to help you with any concern or questions you have about the use of our services. In addition, if you are located Canada, please click here; if you are located in Australia, please click here; if you are located in New Zealand, please click here.

18. CHANGES TO THIS PRIVACY POLICY

We reserve the right to change this Privacy Policy at any time. If we propose to make any material changes, we will notify you by posting a notice on the Website or by issuing an email to the email address listed by registered users prior to the changes becoming effective. You acknowledge that it is your responsibility to maintain a valid email address as a registered user, and to review the Website and this Privacy Policy periodically in order to be aware of any modifications. If you object to any changes to the revised Privacy Policy, you can stop using our services and close your account with us. However, if you continue to use our services (including the Website) after we publish a new or updated Privacy Policy, you acknowledge that such continued use means that the treatment of your Personal Data will be subject to the new or updated Privacy Policy.

19. MINORS AND CHILDREN

Our Services and the Websites are not intended for use by persons under the age of 18 years. ZipRecruiter does not knowingly collect or solicit Personal Data from anyone under the age of 13 or knowingly allow such persons to register to use our Website. In the event that we learn that we have collected Personal Data of a child under the age of 13, we will delete that data to the extent required by applicable law as quickly as possible. If you believe that we might have any Personal Data from or about a child under 13, please contact us at dsars@ziprecruiter.com.

Specific Privacy Policy

If you are located in the EEA, Switzerland, or United Kingdom

This section of the "**Privacy Policy**" applies to the following websites: www.ziprecruiter.co.uk, www.ziprecruiter.ic, www.ziprecruiter.ir, www.ziprecr

1. WHO WE ARE

The Website is owned and operated by ZipRecruiter, Inc. ("**ZipRecruiter**"), which provides an online employment marketplace that connects employers to job seekers.

ZipRecruiter, Inc.

604 Arizona Avenue, Santa Monica, California 90401, USA

Delaware corporation (File Number 4829724)

Pursuant to Article 27 of the European Union's ("EU") General Data Protection Regulation ("GDPR"), we have appointed a representative in Ireland to act as our GDPR representative in the EU, where required ("EU GDPR Representative"). In addition, pursuant to Article 27 of the United Kingdom's ("U.K.") General Data Protection Regulation ("U.K. GDPR"), we have appointed a representative in the U.K. to act as our U.K. GDPR representative, where required ("U.K. GDPR Representative"). You can contact our EU GDPR Representative or our U.K. GDPR Representative by sending an email or by writing to the applicable GDPR Representative identified below:

EU GDPR Representative:

ZipRecruiter, Inc. c/o MCF Legal Technology Solutions Limited Riverside One Sir John Rogerson's Quay Dublin 2, D02 X576, Ireland

Email: ZipRecruiterArt27Rep@mcf.ie

UK GDPR Representative:

ZipRecruiter UK Ltd. c/o Fieldfisher LLP

Registered Office: Riverbank House, 2 Swan Lane, London, EC4R 3TT, UK

ATTN: Privacy Department

Email: Art27Rep@ziprecruiter.com

For more information on the transfer of Personal Data outside the EEA, Switzerland, or the U.K., please see Section 7 below.

2. KEY TERMS

We use certain defined terms that appear in this specific Privacy Policy:

The ZipRecruiter	ZipRecruiter, Inc. and its wholly-owned subsidiaries, ZipRecruiter UK Ltd.,
Group	ZipRecruiter Canada Ltd., and ZipRecruiter Israel Ltd.

Non-Personal Data	Data that is not considered Personal Data under applicable law. We reserve the right to treat data as Personal Data or Non-Personal Data based on the law applicable to the data and the data subject.
Personal Data	Any information or pieces of information that could identify you either directly (e.g., your name) or, where required by applicable law indirectly (e.g., through pseudonymised data, such as a unique ID number). This means that Personal Data includes things like email/home addresses, usernames, user generated content, financial information, and health information. It could also include certain Technical Data (defined below) such as unique numerical identifiers like your computer's IP address or your mobile device's MAC address, as well as cookies ("Device IDs"), where required by applicable law
Special	Sensitive Personal Data that reveals racial or ethnic origin, political opinions,
Categories of	religious beliefs, philosophical beliefs or trade union membership; genetic and
Personal Data	biometric data; and data concerning health, sex life or sexual orientation.
EEA	European Economic Area.

3. DATA WE COLLECT ABOUT YOU

A. Personal Data

As permitted by applicable law in the country from which you access our Website and use our Services, we may collect, use, store and transfer different kinds of Personal Data about you. The table below identifies the categories of Personal Data that ZipRecruiter collects, uses, stores, transfers, or otherwise processes:

CATEGORY OF	EXAMPLES OF PERSONAL DATA WE MAY COLLECT UNDER EACH CATEGORY	
PERSONAL DATA		
Identity Data	First name, maiden name, last name, resume/CV, Social Media profile, username	
	or similar identifier, and profile photo	
Contact Data	Physical address, email address, social media address, telephone number, and any	
	other contact information you provide to us	
Financial Data	Payment card details. However, please note that payment methods (e.g., credit	
	card number and/or PayPal and/or bank account details) are not collected by us	
	directly, but by secure payment service providers	
Transaction Data	Details about payments to and from you, and details regarding the services that	
	you have subscribed to or purchased through a ZipRecruiter Website	
Technical Data	Device IDs, your login data, access dates and times, browser type and version,	
	device information, cookie data, time zone setting and location, browser plug-in	
	types and versions, operating system and platform and other technology on the	
	devices you use to access the Website	
Profile Data	Your username and password, orders made by you, preferences, user-generated	
	content, job searches, candidate searches, job applications, feedback and survey	
	responses	
Business	Job title, company name, company location, number of employees at the company,	
Information	and other company-level data	
Usage Data	Information about how you use our Website, products and services	
Marketing and	Your preferences in receiving marketing from us and our third parties and your	
Communications	communication preferences	
Data		

B. Non-Personal Data

We also collect, use and share "Aggregated Data" such as statistical or demographic data for any purpose. Aggregated Data may be derived from your Personal Data but is not considered Personal Data since it does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. We will also aggregate your Usage Data and certain Profile Data, such as job searches and job applications, to improve our Website, products and services.

C. Third Parties.

For non-users, we may receive Business Information and Contact Data from third-party sources.

D. <u>If You Fail to Provide Personal Data Where Required to Provide Services to You</u>

Where we need to collect Personal Data by law, or under the terms of a contract we have with you, or a prospective contract, and you fail to provide that Personal Data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our services). If so, we may have to cancel the service you have with us (or have requested from us), and you accept that as a condition of service.

E. Data That You Should Not Provide to Us

ZipRecruiter does not require any Special Categories of Personal Data about you in order for you to utilize the ZipRecruiter Website. If you are submitting your resume to our database or sharing your resume with a prospective employer directly using a job application feature on the ZipRecruiter Website, please carefully consider the information that is contained within your resume and ensure that you are not providing any sensitive or other information that is not necessary for your job application or job search. Before submitting any information, either in your resume or otherwise to a prospective employer or recruiter, please also review the section entitled "Interactions with Other Users; Scams, Confidentiality" contained in our Terms of Use.

4. HOW DATA IS COLLECTED

We use different methods to collect Personal Data from and about you including, for example:

A. Direct Interaction

You may give us your identity, contact, billing and other information by filling in forms or by corresponding with us by post, phone, e-mail or otherwise. This includes Personal Data you provide:

- (i) as a ZipRecruiter business client ("Business User") utilizing the following websites www.ziprecruiter.co.uk, www.ziprecruiter.de, www.ziprecruiter.ie, www.ziprecruiter.fr, or our Marketplace Services (each a "Business User Website"), and/or targeting data subjects located in the EEA, Switzerland, or the U.K. As a result of your interactions as a Business User with respect to a Business User Website, you may provide, or we may collect, Personal Data when you:
 - o create a business account on a Business User Website
 - o post a job on a Business User Website
 - o interact with a job seeker who applies to a Job Ad on a Job Seeker User Website (defined below)
 - o if you opt in to receive newsletters or other communications about new or

- existing features or functionalities that might be of interest to you
- o request information to be sent to you
- o customer service, support, or technical request
- o provide feedback to us; and/or
- when you communicate with us on any transactional or other matters;
- (ii) as a job seeker ("Job Seeker") utilizing the following websites www.ziprecruiter.co.uk, www.ziprecruiter.ie, or www.ziprecruiter.fr (each a "Job Seeker User Website"). As a result of your interactions as a Job Seeker with respect to a Job Seeker Website (including your use of the Job Seeker User Website while logged in to your ZipRecruiter or while logged out of your ZipRecruiter account), you may provide, or we may collect, Personal Data when you:
 - o create a job seeker account
 - o apply to a job posted on a Job Seeker User Website
 - o sign up for email job alerts
 - o search for jobs
 - submit data subject request
 - o customer service, support, or technical request
 - o submit feedback
 - authorize ZipRecruiter to connect your account to the account of a "Connected Site" (e.g., Google), we may be able to access information you have provided to the Connected Site, such as name, email and profile information

B. Automated Technologies or Interactions

As you interact with our Website, we may automatically collect Technical Data and Usage Data about your equipment, browsing actions and patterns. We collect this Personal Data and Non-Personal Data by using cookies, server logs and other similar technologies. We may also receive Technical Data and Usage Data about you if you visit other websites employing our cookies and other Tracking Technologies (defined below). For more information regarding our use of Tracking Technologies, please refer to "Cookies and Similar Technologies" below.

C. Third Parties

We may receive Personal Data in the form of Technical Data and Usage Data about you from various third-parties such as analytics providers or advertising networks.

D. ZipRecruiter as a Data Processor

In certain instances, ZipRecruiter acts as a data processor to its clients and is provided Personal Data by such clients (*i.e.*, the data controller). In such case, we process Personal Data under the direction of that client (the data controller) and have no direct relationship with the individuals (data subjects) whose Personal Data we process.

Where ZipRecruiter processes your Personal Data in the capacity of a data processor, and you seek access, or want to correct, amend, or delete your Personal Data, or have other requests, we will provide you with the data controller's contact information, so you can contact them directly. In rare instances, however, circumstances may necessitate ZipRecruiter to assist you with your question or request.

For example, some clients hire ZipRecruiter to send job alert emails to job seekers who have requested job alert emails from such clients. In these cases, ZipRecruiter acts as a data processor to the client, who is the data controller. When ZipRecruiter provides services in the capacity of a data processor, it acts under the instructions and at the direction of such client (*i.e.*, the data controller). In the foregoing example, if you are a job seeker who has requested job alert emails from one of our clients, the client will provide us certain Personal Data about you (such as your name, email address, the type of job you want, and your preferred geographic location) to ensure that the job alert emails meet your search criteria. If you have questions or requests about your Personal Data with respect to the job alert emails, we will provide you with the data controllers contact information so that you can contact the data controller directly.

Where we provide services in the capacity of a data processor, we may need to share your Personal Data with subprocessors that help us provide services to you on behalf of our data controller clients. Transfers to such subprocessor are addressed in the contracts we have with the subprocessors and the data controller clients that originally provided your Personal Data to us.

Personal Data that we process as a data processor is retained by us only for the duration required to service the data controller client, and/or in accordance with the instructions from such client, and/or as necessary to comply with our legal obligations.

5. HOW WE USE YOUR DATA

A. Use of Non-Personal Data

Where permitted by applicable law, we may use your Non-Personal Data 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 data collection.

B. Use of Personal Data

We will only use your Personal Data where permitted by law. Most commonly, we will use your Personal Data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with vou.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interest.
- Where we need to comply with a legal obligation.
- Where you have given us your consent.

C. Purposes for Which We Use Your Personal Data

In the table below, we have described (i) in what context your Personal Data was collected, *i.e.*, what activity you were involved in when we collected or used your Personal Data; (ii) the types of Personal Data that we hold about you; (iii) how and why we use your Personal Data; and (iv) what our legal basis is for using your Personal Data. We will amend the table as required. We have also identified what our legitimate interests are where appropriate. We have also provided you with an explanation of some of the terms we use in this table:

(a) **'Legitimate Interest'** means our interest in conducting and managing our business, to enable us to give you the best experience when using the Website, products, and services. We make

sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Data for our legitimate interests. We do not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

- (b) 'Performance of Contract' means processing your Personal Data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- (c) **'Comply with a legal or regulatory obligation'** means processing your Personal Data where it is necessary for compliance with a legal or regulatory obligation to which we are subject.
- (d) 'Consent' means that you consent to our use of your Personal Data for one or more specific purposes. Where we rely on your consent to use your Personal Data, you have the right to withdraw that consent at any time. You can do this by contacting us at dsars@ziprecruiter.com. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

CONTEXT IN WHICH YOUR PERSONAL DATA IS COLLECTED	WHAT CATEGORIES OF PERSONAL DATA WE MAY HOLD ABOUT YOU	HOW WE MAY USE YOUR PERSONAL DATA	OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA
Account Creation and Management	Identity Data Contact Data Billing Data Financial Data Technical Data Transaction Data Profile Data Business Information Other information you have shared with us about yourself (e.g. via your "My Account" page), by contacting us, or a question via the chat function	 To create and manage your account To communicate with you about your account and process your order To manage our relationship with you To offer you personalized services based on your preferences To respond to your questions To send you email job alerts if you registered to receive job alerts To send you marketing communications (where you have asked us to) which may be tailored to your "profile" (i.e. based on the Personal Data we know about you and your preferences) To manage payments, fees and charges. Please note that payment methods (e.g., credit card number and/or PayPal and/or bank account details) are not collected by us directly, but by secure payment service providers To collect monies owed to us To run analytics or collect statistics 	 To perform our contract with you so you can create your account and use our Services For our legitimate interests to (i) improve our Services; (ii) better engage with you; (iii) mitigate or prevent fraud; and (iv) secure our tools Consent – so you can receive job alert emails or marketing communications

CONTEXT IN WHICH YOUR PERSONAL DATA IS COLLECTED	WHAT CATEGORIES OF PERSONAL DATA WE MAY HOLD ABOUT YOU	HOW WE MAY USE YOUR PERSONAL DATA	OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA
Guest Apply	Identity DataContact DataTechnical Data	To manage any surveys, promotions or competitions you entered To communicate with you regarding our services To enable you to submit job applications without creating an account on our Website To run analytics or collect statistics	 To perform our contract with you so you can use our Services For our legitimate interests to (i) improve our Services, and (ii) better engage with you
Newsletter and Marketing Communications	 Identity Data Contact Data Profile Data Business Information Marketing and Communications Data Other information you have shared with us about yourself (e.g. via your "My Account" page), by contacting us, or a question via the chat function 	 To send you marketing communications (where you have asked us to) which may be tailored to your "profile" based on the Personal Data we know or learn about you and your preferences; To send you newsletters where you have indicated an interest or shown an interest based on your preferences as shown by your activity on the Website and/or your profile To keep your Contact data on a suppression list if you've indicated you don't want to be communicated in a particular way To run analytics or collect statistics To identify business prospects and send marketing materials where permissible by law 	Consent – so you can receive newsletters, and information about products and services that may be of interest to you
Purchases and/or Order Management	 Identity Data Contact Data Billing Data Financial Data Technical Data Transaction Data Profile Data Business Information Other information you have shared with us about yourself (e.g. via your "My Account" page), by contacting us, or a question via the chat function 	 To process your order for any products or services purchased To manage payment. Please note that your payment information (credit card number/PayPal/bank account details) are not collected by us directly, but by secure payment service providers To communicate with you regarding your purchase To secure your transaction against fraud. We may use a third-party provider's solution to detect fraud and make sure that payment is completed To update your transaction 	 The performance of a contract – so you can make purchases and we can manage the associated logistics Our legitimate interests: (i) to improve our products and services; (ii) better engage with you; (iii) prevent fraud; and (iv) secure our tools To comply with a legal obligation – to keep information we are required to, e.g., to comply with our tax and financial reporting obligations with respect to monies you have paid us

CONTEXT IN WHICH YOUR PERSONAL DATA IS COLLECTED	WHAT CATEGORIES OF PERSONAL DATA WE MAY HOLD ABOUT YOU	HOW WE MAY USE YOUR PERSONAL DATA	OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA
		history in your account profile To perform invoicing, debt collections, or manage payment disputes or issues with the services To run analytics or collect statistics.	
Website Administration	Identity Data Contact Data Business Information Technical Data	 To provide administration and IT services, network security, to prevent fraud To troubleshoot To perform data analysis, testing, system maintenance, support, reporting and hosting of data To run analytics or collect statistics To monitor and improve our website 	 For our legitimate interests in running our Website and providing the services and products to users of our Website To perform our contract with you and provide services to you
Use of Website	Identity Data Contact Data Usage Data Profile Data Business Information Technical Data Transaction Data	To provide you with the service(s) you requested such as sending your job application, sending you CVs, posting your job ad, providing you with products that you've requested, notifying you when your CV has been viewed To analyse your preferences and tailor content To monitor and improve our apps and devices To run analytics and statistics, including aggregation of Usage Data.	 Consent – to provide you with the service you have requested, for example, show you recommended products or complete your purchases Our legitimate interests: (i) to continue to provide our products and services to you; (ii) to optimize the provision of such services and products; and (iii) secure our Website and mobile platforms.
Online Browsing Where your Personal Data may be collected by cookies or similar technologies and data analytics	 Usage Data such as where you came from; login details; pages you looked at; duration of your visit; specifics of the services and products you purchased; jobs that you applied to; jobs that you opened; candidate CVs that you viewed; type of jobs you posted; location of jobs Technical Data such as your IP address; browser information; device information; and/or your unique ID and the expiration date of the ID Identity Data Profile Data Business Information 	 To improve our Website, products/services and your user experience To run analytics and collect statistics To enable our Website to function properly (ensure proper display of content); create and remember your account login details; interface personalization, such as language, or any user-interface customization (i.e. parameters attached to your device including your screen resolution or font preference), etc. To understand how you arrived at our Website 	For our legitimate interests to (i) optimize your user experience, including the choices you have made through your personal settings and preferences; (ii) continue to provide our Services and products to you via our Website and mobile platforms Consent, when required by applicable law and/or the choices you have made, to store cookies on your device

CONTEXT IN WHICH YOUR PERSONAL DATA IS COLLECTED	WHAT CATEGORIES OF PERSONAL DATA WE MAY HOLD ABOUT YOU	HOW WE MAY USE YOUR PERSONAL DATA	OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA
		We use information derived from cookies together with other Personal Data that you have already shared with us to deliver you information about employment opportunities that may interest you based on the job searches you made on the Website, jobs you applied to or email alerts you signed up for; candidates that may interest you based upon the job ad you posted; the CVs you viewed To customize our Services for you based upon your activity on the Website (including, if you are a job seeker with a ZipRecruiter account and performed job searches while logged in to your ZipRecruiter or while logged out of your ZipRecruiter account), your preferences for certain skillsets or certain jobs To ensure the proper display of content, including redirecting you to your local ZipRecruiter website where appropriate; to remember your preferences, login and account details, and to improve our websites/apps, for example, by testing new ideas, features, layouts To ensure our websites/apps or services To run data analytics and collect statistics	
Use of the U.K. Mobile App by Job Seekers	 Identity Data Contact Data Transaction Data Technical Data Usage Data 	 To provide you with the service(s) you requested such as sending your job application or create an account To monitor and improve our app To run analytics and statistics. 	 To perform our contract with you so you can create your account on the app, and search for jobs Consent – to provide you with the service you have requested, for example, to submit your application Our legitimate interests, such as to improve the app.

CONTEXT IN WHICH YOUR PERSONAL DATA IS COLLECTED	WHAT CATEGORIES OF PERSONAL DATA WE MAY HOLD ABOUT YOU	HOW WE MAY USE YOUR PERSONAL DATA	OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA
User-Generated Content Such as profiles, CVs and job ads	Identity Data Contact Data Usage Data Profile Data Business Information Transaction Data Technical Data	 To send your CV to the employer whose job ad you applied to or to send you CVs of candidates that appear to have the skill set in your job ad To send you job alert emails where you have opted to receive them directly from ZipRecruiter or from one of our clients To display your Job Ad on our Website to facilitate viewing by job seekers To run analytics and statistics To add the CVs you've viewed or the jobs that you've applied for, to your account and profile To help you build your profile during account creation and suggest jobs to you based on your profile and/or CV 	Consent – to provide you with the Services you have requested, including, but not limited to, posting your job ad on our Website, facilitating your job application, and/or distributing your content in accordance with any contract we have with you Our legitimate interests: (i) to provide you with the Services and products you have requested; (ii) better engage with you; and (iii) secure our tools and design new features. Performance of our contract with you
Enquiries and Messaging Initiated by You Where your Personal Data is collected when you ask questions relating to our services and/or your account	Identity Data Contact Data Profile Data Business Information Transaction Data Technical Data Usage such as content of chats, messages, or enquiries; number of messages you've sent and received; when you viewed a message; who responded to your chats	 To answer and manage your enquiries To run analytics and statistics To add your questions or concerns to your profile so we can understand your interests and preferences To troubleshoot any problems that you are experiencing We also may use automatic scanning technology on messages to allow us to recognize patterns on our messaging platform to make your professional communications more efficient and informed and contribute to a safer and more secure job search experience or check links shared in messages for malicious sites and looks for blacklisted keywords to detect spam and fraud. 	Our legitimate interests: (i) to respond to any enquiries or messages from you(ii) to fulfil any services related to your communication with us Where we need to comply with a legal or regulatory obligation (for example, data subject access rights)

D. Automated Decision-Making

We use automated decision-making to help improve our products and services to you. For example, we may use automated technologies to send you job alert emails regarding roles that may be of

interest to you based upon your search criteria (if you have consented to receive job alert emails directly from ZipRecruiter, in our capacity as a data controller), show you jobs that may be of interest to you based on your searches while you are using our Website, and/or show you jobs based upon your application history or CV.

6. HOW WE SHARE OR DISCLOSE YOUR DATA

We require all third parties to respect the security of your Personal Data and to treat it in accordance with the law. We do not allow our third-party data processors to use your Personal Data for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with our instructions and this Privacy Policy. Below we explain in more detail how ZipRecruiter shares or discloses your Personal Data outside of ZipRecruiter.

A. Disclosures of Personal Data at Your Direction

We disclose your Personal Data when you intentionally interact with third parties and when you direct us or intentionally use ZipRecruiter to share your Personal Data in connection with the services that we provide to you. For example:

- If you are a job seeker, we will share your Personal Data as follows:
 - o If you apply to a job posting on our Website, we will share your Identity Data and Contact Data with the prospective employer and/or their agent of the job to which you applied, including but not limited to, any external Applicant Tracking System or any other external system used by the direct employer to manage the hiring of employees or other categories of workers.
 - For any other purpose authorized by you when you provide us with the information or otherwise choose to participate in new features and functions available through the Services.

<u>Please Note:</u> Please ensure that the profile information and CV associated with your account is up-to-date, so when you apply for a job vacancy through a Job Seeker User Website, the employer receives your most recent CV. When you apply to a job vacancy, you will be given the option to use the CV saved in your account or upload a different CV before submitting the application. You can delete or replace your CV by going to (1) the 'Profile' settings in your account on the Job Seeker User Website; or (2) going to the 'Account' icon in the mobile app (if you are a mobile app user in the U.K.).

- If you are a Client, we will share your Personal Data as follows:
 - If you authorize ZipRecruiter to send automated personalized invitations or other communications to candidates on your behalf, your Identity Data and Business Information will be shared with candidates that are invited to connect with you and/or apply to your job.
 - For any other purpose authorized by you when you provide us with the information or otherwise choose to participate in new features and functions available through the Services.

B. <u>Disclosures of Personal Data for a Business Need or Other Purpose</u>

We describe in detail below how ZipRecruiter may share or disclose Personal Data with third parties:

Internal Parties

With the ZipRecruiter Group: We may disclose your Personal Data to companies within our
corporate family that comprise the ZipRecruiter Group. Access to your Personal Data will be
controlled and only granted where necessary to provide our services to you and/or to allow
us to perform any necessary or legitimate functions.

External Third-Parties

- Service Providers, vendors, and contractors: We may disclose your Personal Data to service
 providers, vendors, or independent contractors that we use to support our business and/or
 help provide our services to you, including, but not limited to, third-parties that host our
 Website, assist us to verify your identity, perform website and platform maintenance, risk
 assessments, and security, perform data and web analytics, provide databases, IT services,
 customer service, payment platforms and credit card processing, communication services,
 and email services.
- Advertising partners or advertising networks: We may disclose certain Personal Data about
 you that is collected through cookies and other tracking technologies. Please see our <u>Cookie</u>
 <u>Policy</u> for more information.
- Professional advisors: We may disclose your Personal Data to professional advisers such as lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance, financial, auditing, and accounting services to us so we can operate our business.
- Third Parties for a Specific Business Purpose: We may disclose Personal Data to carry out specific business purposes. For example:
 - Fraud prevention and identity verification services where we believe that disclosure is necessary or appropriate to protect the rights, property, or safety of ZipRecruiter, our customers or others. This includes exchanging information with third-parties for the purposes of fraud detection and prevention and credit risk reduction.
 - To enforce our <u>Terms of Use</u> and other agreements with you, to respond to, and defend ourselves against, claims asserted against us, to protect the rights, property, or safety of ZipRecruiter, our services, customers or others, or to investigate, prevent, or take action regarding suspected or actual illegal activities or for debt collection.
 - For any other purpose disclosed by us when you provide the information.
- Third Parties for Purposes of a Business Transfer: We may disclose Personal Data in connection with or during negotiations of any proposed or actual financing, merger, purchase, sale, sale or transfer of some or all of our assets or stock, joint venture, or any other type of financing, acquisition or business combination of our company(ies), or all or any portion of our assets, or transfer of all or a portion of our business to another company, including without limitation in the event of a divestiture, restructuring, reorganization, dissolution or other event, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding. In the event of a merger, divestiture, restructuring, reorganization, or other sale or transfer of some or all of our assets or stock, Personal Data that we hold about our clients and users of our services will be one of the assets that will be transferred. If a change happens to our business, the new owners may only use your Personal Data in accordance with this Privacy Policy.

- Third Parties with Your Consent: We may disclose Personal Data to third parties, where you have expressly consented to the disclosure of your Personal Data.
- Government Entities: We may disclose Personal Data to law enforcement agencies, courts, supervisory authorities, regulatory bodies and certain other third-parties, to the extent that we are permitted or required to do so by law, or in order to comply with our legal and regulatory obligations, or in the interests of national security, or to respond to verified requests relating to a criminal investigation or alleged or suspected illegal activity. This may also include taxing authorities, such as the Internal Revenue Service and other authorities acting as processors based in the United States, the U.K. and other applicable countries, who require reporting of processing activities in certain circumstances.

C. Non-Personal Data

Where permitted by applicable law, we may share your Non-Personal Data 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 data collection.

7. WHERE YOUR DATA IS TRANSFERRED

ZipRecruiter, Inc. is headquartered in the United States of America (USA).

The information that you provide or that we collect as a result of your interaction with the Website and/or your use of our services on the Website is transferred to the USA and/or to another country where we have a subsidiary or where we have engaged data processors or subprocessors. Some countries that are not located within the EU or U.K may be recognized by the European Commission as providing an adequate level of data protection. For transfers from the EU or U.K. to countries not considered as adequate by the European Commission, we have put in place measures, including by ensuring that the recipient is bound by EU Standard Contractual Clauses, to protect your Personal Data, which can be found at https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en. When we transfer Personal Data from the EU, U.K., or Switzerland to the USA, we also adhere to the EU-U.S. Data Privacy Framework with UK Extension, and Swiss-U.S. Data Privacy Framework (collectively, the "Data Privacy Framework Principles, as described in our Data Privacy Framework certification, which you can find at https://www.dataprivacyframework.gov/s/participant-search/participant-detail?id=a2zt0000000TNnuAAG&status=Active.

8. HOW LONG YOUR DATA WILL BE KEPT

Different retention periods apply for different types of Personal Data and in determining the appropriate retention period, we consider several criteria, including, but not limited to, the purpose for which we hold your Personal Data, our legal, accounting, reporting and/or regulatory obligations in relation to that Personal Data (e.g., financial or tax reporting obligations), whether our relationship with you is ongoing (e.g., where you use more than one of our products and/or services), any specific request you may have made in relation to the deletion of your Personal Data, or where we have a legitimate interest in relation to the management of our own rights (e.g., the defence of any claims). In some circumstances we may anonymize your Personal Data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Once you no longer have a relationship with us, we will retain or securely delete or destroy your Personal Data subject to the foregoing and in accordance with applicable laws and regulations. If you

request to receive no further contact from us, we will keep some basic information about you on our suppression list in order to avoid sending you unwanted materials in the future.

9. YOUR DATA SUBJECT ACCESS RIGHTS

Data subjects in the EEA, Switzerland, and U.K. have the following rights with respect to their Personal Data:

YOUR RIGHTS	WHAT CAN YOU REQUEST
Right to	The right to know what Personal Data we hold about you and how we use it.
Information	
Right to Access	The right to be provided with a copy of your Personal Data (subject to certain restrictions).
Right of	The right to require us to correct any incomplete or inaccurate Personal Data we
Rectification	hold about you, though we may need to verify the accuracy of the new data you
	provide to us. If you have a user account with us, you also have the option of correcting your information directly in your account.
Right to	This enables you to ask us to delete or remove Personal Data where there is no
erasure/be	good reason for us to continue to process it. Note, however, that we may not
forgotten	always be able to comply with your request for erasure and in such circumstances,
	will notify our reasons to you.
Right to restrict	The right to require us to restrict processing of your Personal Data, i.e., you can
processing	request that we suspend the processing of your Personal Data in the following
	scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of
	the data is unlawful but you do not want us to erase it; (c) where you need us to
	hold the data even if we no longer require it as you need it to establish, exercise
	or defend legal claims; or (d) you have objected to our use of your data but we
	need to verify whether we have overriding legitimate grounds to use it.
Right to request	In certain circumstances, you have the right to request the transfer of your
data portability	Personal Data to you or to a third party in a commonly used machine-readable
	format. Note, however, that this right only applies to automated information
	which you initially provided consent for us to use or where we used the
Diabt to abiast	information to perform a contract with you.
Right to object	You have the right to object to the processing of your Personal Data in the
to processing	following circumstances: (i) at any time to your Personal Data being processed for direct marketing (including profiling); or (ii) in certain other situations, to our
	continued processing of your Personal Data, e.g., our processing of your Personal
	Data when such processing is based on our legitimate interests. In some cases, we
	may demonstrate that we have compelling legitimate grounds to process your
	information which override your rights and freedoms.
Right to	You have the right to withdraw your consent at any time where we are relying on
withdraw	consent to process your Personal Data. However, this will not affect the lawfulness
consent at any	of any processing carried out before you withdraw your consent. If you withdraw
time	your consent, we may not be able to provide certain products or services to you.
	We will advise you if this is the case at the time you withdraw your consent.
Right not to be	The right not to be subject to a decision based solely on automated processing
subject to a	(including profiling) that produces legal effects concerning you or similarly
decision based	significantly affects you. However, your right does not apply if: (i) you gave us
solely on	your explicit consent to use your Personal Data to make our decision; (ii) we are
automated	allowed by law to make our decision; or (iii) our automated decision was
decision-	necessary to enable us to enter into a contract with you.
making	

YOUR RIGHTS	WHAT CAN YOU REQUEST
"Post-mortem"	This right allows you to define directives relating to the conservation, deletion,
Right (for data	and communication of your personal data after your death, under the conditions
subjects	provided for in Article 85 of Law No. 78-17 of 6 January 1978 relating to
residing in	information technology, files and freedoms as amended. In particular, you may
France	register your specific directives – i.e. the directives indicating how your personal
	data relating to certain processing operations identified in the said directives are
	to be processed after your death – with us. You may revoke or change your
	instructions at any time. Compliance with the instructions is without prejudice to
	the provisions applicable to public–records containing personal data.

Method for Requesting Information Pursuant to Your Rights

Upon request, ZipRecruiter will provide you with information about whether we hold any of your Personal Data. If you would like to exercise any of the data subject access rights in the table above (each, a "Rights Request"), please send an email to dsars@ziprecruiter.com and identify the specific website to which your request relates.

No Fee Usually Required

You will not usually be required to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances and, in such case, we will notify you within a reasonable timeframe regarding our reasons for refusing to act on your request.

What We May Need from You

Once we receive your Rights Request, we may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it.

If we are not clear as to what you are requesting, we may also need to contact you for clarification so we can more fully respond to your request.

If we cannot locate any records about you, we may also ask you for additional information to assist us in locating records, if they exist.

Time Limit to Respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. COOKIES AND TRACKING TECHNOLOGIES

ZipRecruiter and third parties may use cookies or similar tracking technologies (e.g., pixels, beacons, scripts, etc.) ("Tracking Technologies") to analyze trends, administer the Website, track users' movements around the Website, and to gather demographic information about our user base as a whole. You can control the use of cookies at the individual browser level or via our cookie consent manager on the Website, but if you choose to disable cookies, it may limit your use of certain features

or functions on our Website or service. For more information about the types of cookies and Tracking Technologies that we, and certain third parties use, and why we use them, and how you can control these, please review our **Cookie Policy**.

We partner with third parties to either display advertising on our websites or to manage our advertising on other sites. Our third-party partners may use cookies or similar technologies in order to provide you advertising based upon your browsing activities and interests. If you wish to opt out of any interest-based advertising <u>click here</u>, or if located in the European Union <u>click here</u>. Please note that you will continue to receive generic ads.

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 the application from which your information was downloaded.

We use email pixels to track whether our marketing emails are opened so that we can understand the effectiveness of our email marketing campaigns. To analyze the effectiveness of pixels used in our email marketing campaigns, we will remove your email address from the process we undertake in connection with this analysis. If you wish to block email pixels, you will need to use the function offered by most email providers which prevents your emails from automatically loading images.

To the extent permitted by applicable law, we may 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.

11. DATA SECURITY

We use appropriate technical and organizational measures to protect Personal Data we process about you.

However, no transmission of information via the Internet or wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your Personal Data, you acknowledge that there are security and privacy limitations of the Internet which are beyond our control and accordingly, the security, integrity and privacy of data exchanged between you and us through the Website cannot be guaranteed.

We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

The safety and security of your Personal Data also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your login or account credentials with anyone and keep your account information secure. We urge you to be careful about giving out information in public areas of the Website like message boards, where information will be available to other users of the Website. If you believe that your access credentials or Personal Data have been compromised, please contact us immediately.

12. LINKS TO THIRD PARTY WEBSITES AND SOCIAL MEDIA FEATURES

Our Website may from time to time, contain links to third-party services such as websites, locations, platforms, applications or services operated by third parties. If you follow a link to or otherwise access any of these third-party services, these third-party services may use their own cookies, web beacons, and other Tracking Technology to independently collect information about you and may solicit Personal Data from you. Please note that these third-party services have their own privacy policies and we do not accept any responsibility or liability for these parties' policies or practices. Please check these policies before you share any Personal Data with these third-party services.

We may offer you the opportunity to use your social media login when interacting with our Website. If you do so, please be aware that you may be sharing your profile information with us. The Personal Data that is shared will depend on your social media platform settings. Please visit the relevant social media platform and review its privacy policy to understand how your Personal Data is shared and used in this context.

Social media features may also collect your IP address, which page you are visiting on our Website, and may set a cookie or other Tracking Technologies to enable the applicable social media feature to function properly. Your interactions with these features are governed by the privacy policy of the company providing such features.

The Website may include tools provided by us or third-party services that enable you to send a message to another person. If you use any such tools, please ensure that you only send messages to persons to whom you have permission to send messages. Absent the recipient's consent, we will only use their Personal Data that you provide us to facilitate such messages.

13. PUBLIC FORUMS

You should be aware that when you voluntarily disclose any Personal Data in a public forum on the Website, this information, along with any information disclosed in your communication, can be collected and used by third parties and may result in unsolicited messages from third parties. Such activities are beyond our control and this Privacy Policy does not apply to such information. You accept that you, and not ZipRecruiter, are responsible for providing such information in any public forum. Any submissions to public areas on the Website are accepted by you with the understanding that such forums are accessible to all third parties. If you do not want your comments or any content to be viewed by third parties, you are advised not to make any submissions. Please be careful and responsible whenever you're online.

14. INVITATION SERVICE

If you choose to use our invitation service to invite a friend to our Services, we provide you with a link to copy and paste to share with your friends, or spread the word on LinkedIn, Facebook or Twitter. We provide you with a unique link ID so that you earn credit for each friend that joins the site by following your link. Your friend may contact us to request that we remove this information from our database at dsars@ziprecruiter.com.

If you wish to invite a friend to view our blog posts, we will ask you for that person's email address and automatically send an email invitation. ZipRecruiter stores this information to send this email, to register your friend if your invitation is accepted, and to track the success of our invitation service. Your friend may contact us to request that we remove this information from our database at dsars@ziprecruiter.com.

15. MOBILE APP USERS IN THE UNITED KINGDOM

If you use our mobile application ("App"), the CV/resume you upload in the App will be the default CV/resume used when you apply to jobs in the App. You can update your name and email, or replace your CV/resume, by going to the "Account" icon available on the App's home page. Your Personal Data and CV/resume may be deleted at any time by deleting the App from your device.

You may opt out of providing your location information by using your device settings. On your Android device, go to 'Settings' > 'Apps' > 'ZipRecruiter' > 'Permissions,' and de-select 'Location.

If you expressly opt-in to receive job alert emails in the App, you can unsubscribe at any time by clicking the "Unsubscribe" link in any job alert email you receive.

16. QUESTIONS OR COMPLAINTS

If you have a complaint, or if you have questions or requests regarding your Personal Data, please email us at dsars@ziprecruiter.com, and specify the country in which you are located and the website to which your request relates. If we are not able to address your concern and if you are located in the EEA, Switzerland, or the U.K., you have the right to lodge a complaint with the Data Protection Authority where you are located or where the issue took place. For contact details of your local Data Protection Authority, please see www.ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm. Contact information for the Information Commissioner's Office (ICO), which is the supervisory authority in the U.K. can be found at https://ico.org.uk/make-a-complaint.

17. CHANGES TO THIS PRIVACY POLICY

We reserve the right to change this Privacy Policy at any time. If we propose to make any material changes, we will notify you by posting a notice on the Website or by issuing an email to the email address listed by registered users prior to the changes becoming effective. You acknowledge that it is your responsibility to maintain a valid email address as a registered user, and to review the Website and this Privacy Policy periodically in order to be aware of any modifications. If you object to any changes to the revised Privacy Policy, you can stop using our services and close your account with us. However, if you continue to use our services (including the Website) after we publish a new or updated Privacy Policy, you acknowledge that such continued use means that the treatment of your Personal Data will be subject to the new or updated Privacy Policy.

18. MINORS & CHILDREN

Our Services and the Website are not intended for use by persons under the age of 18 years. ZipRecruiter does not knowingly collect or solicit Personal Data from anyone under the age of 13 or knowingly allow such persons to register to use our Website. In the event that we learn that we have collected Personal Data of a child under the age of 13, we will delete that data to the extent required by applicable law as quickly as possible. If you believe that we might have any Personal Data from or about a child under 13, please contact us at dsars@ziprecruiter.com.

HOW TO CONTACT US

<u>Data Privacy Questions or Requests</u>. If you have any questions regarding our Personal Data practices or would like to unsubscribe, please contact us by using the communication means described below, and specify the website to which your request relates.

TYPE OF ENQUIRY	EMAIL ADDRESS	MAILING	TELEPHONE	LIVE CHAT
		ADDRESS		
Data Subject	dsars@ziprecruiter.com	See Below	Send Request by	Send Request by
Information/Rights Requests			Mail or Email	Mail or Email
Privacy-Related Questions	dsars@ziprecruiter.com	See Below	Send Request by	Send Request by
			Mail or Email	Mail or Email
Unsubscribe Requests	unsubscribe@ziprecruiter.com	Send	Send Request by	Send Request by
		Request	Email	Email
		by Email		

<u>Technical Support or Customer Service Questions or Requests</u>. Wherever you are located, if you have any questions as regards the use of our services, questions about your account, and/or technical or other customer support questions regarding your use of our services, please contact our Customer Service team by using one of the communication means described below (as applicable).

US: 1-877-252-1062 (24 hours/7 days); support@ziprecruiter.com

Canada: 1-855-628-2506 (24 hours/7 days); support@ziprecruiter.com

Australia: 61-18-0059-2251(6am - 6pm AEDT); support@ziprecruiter.com.au
New Zealand: 64-8004-31275 (6am – 6pm local time); support@ziprecruiter.nz

India: 91-8000502006 (6am – 6pm local time); support@ziprecruiter.in

UK: 011-44-8000318638 (6am – 6pm local time); support@ziprecruiter.co.uk
Germany: +49 800 000 8346 (6am – 6pm Munich time); support@ziprecruiter.de
Ireland: +353 1 80 0849006; (6am – 6pm local time); support@ziprecruiter.ie
France: +33 1 57 96 91 55; (6am – 6pm local time); support@ziprecruiter.fr

You can also use the Live Chat function on our Website (where available), if you have any questions.

Mailing Addresses

U.S. Mailing Address	U.K. Mailing Address	
ZipRecruiter, Inc. Attn: Business Affairs 604 Arizona Avenue Santa Monica, California 90401, USA Delaware Corporation File Number: 4829724 ICO Registration Number: ZA454860	ZipRecruiter UK Ltd. C/o Fieldfisher LLP Riverbank House, 2 Swan Lane, London, EC4R 3TT, England, UK Company No. 9988220 ICO Registration Number: ZA197224	
Article 27 Representatives		
EU GDPR Representative: ZipRecruiter, Inc. C/o MCF Legal Technology Solutions Limited Riverside One Sir John Rogerson's Quay Dublin 2, D02 X576, Ireland	U.K. GDPR Representative: ZipRecruiter UK Ltd. C/o Fieldfisher LLP Attn: Privacy Riverbank House, 2 Swan Lane, London, EC4R 3TT, England, UK	
Email: ZipRecruiterArt27Rep@mcf.ie	Email: art27rep@ziprecruiter.com	