

ON STRIDER PRIVACY POLICY

Effective as of February 15, 2022

INTRODUCTION

On Strider, Inc. (“Strider,” “we,” “our,” or “us”) respects the privacy of your information. This Privacy Policy is designed to assist you in understanding how we collect, use and safeguard the information you provide to us in using our websites (the “Sites”) and the services provided through our Sites (the “Services”).

From time to time, we may change this Privacy Policy. If we do, we will post an amended version on this webpage. If we make material changes to our Privacy Policy, we may also notify you by other means, such as sending an email or posting a notice on our home page. If required by applicable data protection laws, we will obtain your consent to any material changes. Please review this Privacy Policy periodically.

Please also refer to our Terms of Use regarding the proper usage of the Sites and Services.

This Privacy Policy covers the following topics:

1. **WHAT IS STRIDER?**
2. **COLLECTING AND USING INFORMATION**
3. **COOKIES AND OTHER TRACKING TECHNOLOGIES**
4. **THIRD PARTY PROCESSORS**
5. **INTERNATIONAL DATA TRANSFERS**
6. **“DO NOT TRACK” SIGNALS**
7. **ADVERTISING AND MARKETING CHOICES**
8. **THIRD PARTY LINKS**
9. **SECURITY**
10. **CHILDREN’S PRIVACY**
11. **YOUR CHOICES AND RIGHTS**
12. **YOUR PERSONAL DATA AND YOUR RIGHTS –UNITED STATES ONLY**
13. **YOUR PERSONAL DATA AND YOUR RIGHTS – REST OF THE WORLD**
14. **HOW TO CONTACT US**

1. **WHAT IS STRIDER?**

Strider’s offices are located at 2093 Philadelphia Pike #4949, Claymont, Delaware 19703. Strider is the data controller of all personal data collected from residents of countries that recognize controller and processor obligations under applicable data privacy laws.

2. **COLLECTING AND USING INFORMATION**

Personal Data We Collect

Through your use of the Sites and Services, we will collect personal data from you. For purposes of this Privacy Policy, “Personal Data” refers to any information relating to an identified or identifiable natural person that we maintain in an accessible form.

Information You Provide

When you use the Sites or Services, you may voluntarily provide us with the following types of Personal Data:

- *Contact Information.* First and last name, email address, phone number, billing address, physical address, and related information.
- *Professional Information.* Company name, job title, job history, professional skills, experience, career objectives, and related information.
- *Video, Image, and Audio Information.* Photos, images, videos, audio samples, and related information.
- *Interaction Information.* Information related to interactions with job-seekers, Strider representatives, and employers.
- *Extrapolated Information.* Information extrapolated from Personal Data such as, but not limited to, preferences, skill level, and personal attributes.

Information as You Navigate Our Sites and Services

We automatically collect certain Personal Data through your use of the Sites and Services. We will automatically collect certain Personal Data, such as the following:

- *Usage Information.* For example, the pages on the Sites you access, the frequency of access, and what you click on while on the Sites.
- *Device Information.* For example, hardware model, operating system, application version number, and browser.
- *Mobile Device Information.* Aggregated information about whether the Sites are accessed via a mobile device or tablet, the device type, and the carrier.
- *Location Information.* Location information from Site visitors on a city-regional basis.

Third Party Information

In some cases, we may receive certain Personal Data from you about a third party. For example, when you create a profile, you may provide a third party’s name, email address, phone number, and other additional information. If you submit any Personal Data about another individual to us, you are responsible for making sure that you have the authority to do so and to allow us to use their Personal Data in accordance with this Privacy Policy.

How We Use Your Personal Data

We use the Personal Data we collect to provide the Services to you, to improve our Services and Sites, and to protect our legal rights. In addition, we may use the Personal Data we collect to:

- Process your profile registration;
- Connect job seekers and employers;
- Process survey results;
- Evaluate job skills assessments
- Contact you regarding our products and services that we feel may be of interest to you;
- Communicate with you about our Sites or Services or to inform you of any changes to our Sites or Services;
- Provide support;
- Maintain and improve our Sites and Services;
- Defend our legal rights and the rights of others;
- Efficiently maintain our business; and
- Comply with applicable law.

How We Share Your Personal Data

We may share the information that we collect about you in the following ways:

- With service providers who perform data services on our behalf (e.g., email, hosting, maintenance, backup, analysis, etc.);
- To service providers to prepare, deploy and analyze advertising content;
- To the extent that we are required to do so by law;
- In connection with any legal proceedings or prospective legal proceedings;
- To establish, exercise, or defend our legal rights, including providing information to others for the purposes of fraud prevention;
- To any person who we reasonably believe may apply to a court or other competent authority for disclosure of that Personal Data where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that Personal Data;

- To any other person or entity as part of any business or asset sale, equity transaction, merger, acquisition or in preparation for any of these events; and
- To any other person or entity where you consent to the disclosure.

3. COOKIES AND OTHER TRACKING TECHNOLOGIES

Like many other companies, we use cookies and other tracking technologies (such as pixels and web beacons).

Google Analytics

We use Google Analytics, a web analytics service provided by Google, Inc. Google Analytics uses Cookies or other tracking technologies to help us analyze how users interact with the Sites and Services, compile reports on their activity, and provide other services related to their activity and usage. The technologies used by Google may collect information such as your IP address, time of visit, whether you are a returning visitor, and any referring website. The technologies used by Google Analytics do not gather information that personally identifies you. The information generated by Google Analytics will be transmitted to and stored by Google and will be subject to Google's [privacy policies](#). To learn more about Google's partner services and to learn how to opt-out of tracking of analytics by Google, click [here](#).

4. THIRD PARTY PROCESSORS

To ensure that your Personal Data receives an adequate level of protection, we have put in place appropriate procedures with the service providers we share your Personal Data with to ensure that your Personal Data is treated by those service providers in a way that is consistent with and which respects the applicable laws on data security and privacy. For example, we use service providers for marketing, client relationship management, cloud data storage, accounting software, workspace software, and project management software.

5. INTERNATIONAL DATA TRANSFERS

We operate internationally and transfer information to the United States for the purposes described in this policy. The United States may have privacy and data protection laws that differ from, and are potentially less protective than, the laws of your country. Your Personal Data can be subject to access requests from governments, courts, or law enforcement in the United States according to the laws of the United States.

To the extent required by law, we use appropriate safeguards to ensure for the lawful processing and cross-border transfer of the Personal Data, including, when appropriate, the use of [standard contractual clauses](#).

6. "DO NOT TRACK" SIGNALS

Some internet browsers incorporate a "Do Not Track" feature that signals to websites you visit that you do not want to have your online activity tracked. Given that there is not a uniform way that browsers communicate the "Do Not Track" signal, the Sites do not currently interpret, respond to or

alter its practices when it receives “Do Not Track” signals.

7. ADVERTISING AND MARKETING CHOICES

Depending on your location (and reflecting applicable law), you may have been asked to indicate your preferences, provide us with your consent regarding the receipt of such information from us, and indicate how you would like to receive it.

Wherever you are located, we will send you marketing communications based on any preferences you may have expressed.

We only want to send you information in which you are interested. If you do not want to receive these communications or would like to understand more about other unsubscribe options, please contact us as set out in the “**HOW TO CONTACT US**” section below.

For email communications, you can opt-out and/or manage your preferences by clicking on the unsubscribe link provided at the bottom of any email you receive from us. You also may submit a request to us at privacy@onstrider.com. If we call you with information you do not want to receive, you can advise us of this during the telephone call.

8. THIRD PARTY LINKS

The Sites may contain links that will let you leave the Sites and Services and access another website. Linked websites are not under our control. Except as stated below, this Privacy Policy applies solely to Personal Data that is acquired on the Sites. We accept no responsibility or liability for these other websites.

9. SECURITY

We maintain commercially reasonable security measures to protect the Personal Data we collect and store from loss, misuse, destruction, or unauthorized access. However, no security measure or modality of data transmission over the Internet is 100% secure. Although we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee absolute security.

10. CHILDREN’S PRIVACY

The Sites and Services are not intended for children under 16 years of age. We do not knowingly collect, use, or disclose personal information from children under 16.

11. YOUR PERSONAL DATA AND YOUR RIGHTS –UNITED STATES ONLY

California Shine the Light Law

We do not disclose personal information obtained through our Sites or Services to third parties for their direct marketing purposes. Accordingly, we have no obligations under California Civil Code § 1798.83.

Notice to Nevada Residents

Nevada law allows Nevada residents to opt-out of the sale of certain types of personal information. Subject to a number of exceptions, Nevada law defines “sale” to mean the exchange of certain types of personal information for monetary consideration to another person. We do not currently sell personal information as defined in the Nevada law. However, if you are a Nevada resident, you still may submit a verified request to opt-out of sales and we will record your instructions and incorporate them in the future if our policy changes. Opt-out requests may be sent to privacy@onstrider.com.

12. YOUR PERSONAL DATA AND YOUR RIGHTS – REST OF THE WORLD

Depending upon the jurisdiction in which you are located, you may be entitled to the following explanation of the legal bases or additional legal bases we rely on to process your Personal Data and a description of your privacy rights.

Legal Bases for Processing Your Personal Data

The legal basis for collecting and using the Personal Data described above will depend on the Personal Data concerned and the specific context in which we collect it.

Consent

We may process your Personal Data based on your consent such as when you create an account or when you ask us to send certain kinds of marketing communications. You have the right to withdraw your consent at any time without affecting the lawfulness of the processing based on consent before its withdrawal.

Our Legitimate Interests

We may process your Personal Data if doing so is necessary for our legitimate interests and your rights as an individual do not override those legitimate interests. For example, when we process your Personal Data to carry out fraud prevention activities and activities to increase network and information security, to market directly to you, to expand our business activities and to improve our services and the content and functionality of our Sites.

To Perform a Contract

We may process your Personal Data to administer and fulfill contractual obligations to you.

To Enable Us to Comply with a Legal Obligation

We may process your Personal Data to comply with legal obligations to which we are subject. This may include any requirement to produce audited accounts and to comply with legal process.

Necessary for the Exercise or Defense of Legal Claims

If you bring a claim against us or we bring a claim against you, we may process your Personal Data in relation to that claim.

If you have any questions about or need further information concerning the legal basis on which we collect and use your Personal Data for any specific processing activity, please contact us using the “**HOW TO CONTACT US**” section below.

Your Rights

Depending on the jurisdiction in which you are located, you may have certain rights with respect to your Personal Data. For example, you may have the following rights:

- Right to access your Personal Data;
- Right to rectify your Personal Data;
- Right to restrict our use of your Personal Data;
- Right to object to our use of your Personal Data;
- Right to delete your Personal Data;
- Right to transfer your Personal Data to another service provider;
- Right to make a complaint to your local supervisory authority;
- Right to correction of outdated Personal Data;
- Right to information about public and private entities with which we have shared Personal Data;
- Right to anonymization, blocking, or deletion of unnecessary, excessive, or processed data in violation of applicable law;
- Right to oppose the processing of Personal Data if the processing is based on a legal bases other than consent and the processing violates applicable law;
- Right to oppose or object to the use of your Personal Data for the purposes of advertising, market research, or opinion polls;
- Right to request evidence that you granted consent to processing;
- Right to prevent data from being supplied;
- Right to revoke consent to the processing of your Personal Data;
- Right to indemnification by the data controller and processor; and
- Right to modification, complementation, and inclusion of Personal Data;

If you would like to exercise your legal rights, please contact us at privacy@onstrider.com. We will process your request in accordance with any applicable legal requirements.

How Long Is Your Personal Data Kept?

We will retain your Personal Data for as long as necessary to fulfill the purposes for which we collect it and as set out in this Privacy Policy and for the purpose of satisfying any legal, accounting, or reporting requirements that apply to us.

13. HOW TO CONTACT US

For questions or concerns about our privacy policies or practices, please contact us at privacy@onstrider.com or at

On Strider, Inc.
2093 Philadelphia Pike #4949

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United States