

Labor Market Intelligence Privacy Policy

Effective as of September 8, 2021,

This Privacy Policy describes the privacy practices of One Model Inc. ("**One Model**," "**we**", "**us**" or "**our**") with relation to how we handle personal information that we collect through our Labor Market Intelligence product (the "**Service**").

You can download a printable copy of this Privacy Policy [here](#).

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Personal information we collect

Information you provide to us. Personal information you may provide to us through the Service or otherwise includes:

- **Contact data**, such as first and last name, salutation, email address, billing and mailing addresses, professional title and company name, and phone number.
- **Demographic Information**, such as city, state, country of residence, postal code, and age.
- **Education Information** (such as institutions attended, dates of attendance, and degrees conferred).
- **Communications** that we exchange with you, including when you contact us with questions or feedback, through the Service, social media, or otherwise.
- **Transactional data**, such as information relating to or needed to complete your orders on or through the Service, including order numbers and transaction history.
- **Marketing data**, such as your preferences for receiving our marketing communications and details about your engagement with them.
- **Professional or Employment Information** (such as current and past employers, salary, qualifications, language capabilities, employment dates and employment locations).
- **Other data** not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

Third-party sources. We may combine personal information we receive from you with personal information we obtain from other sources, such as:

- **Public sources**, such as government agencies, public records, social media platforms (including LinkedIn), and other publicly available sources.
- **Data providers**, such as information services and data licensors that provide demographic and other information.
- **Marketing partners**, such as joint marketing partners.

Automatic data collection. We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and your interaction over time with the Service, our communications and other online services, such as:

- **Device data**, such as your computer's or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers (including identifiers used for advertising purposes), language settings, mobile device carrier, radio/network information (e.g., Wi-Fi, LTE, 3G), and general location information such as city, state or geographic area.
- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing to the Service, navigation paths between pages or screens, information about your activity on a page or screen, access times and duration of access, and whether you have opened our marketing emails or clicked links within them.
- **Location data** when you authorize the Service to access your device's location.

How we use your personal information

We may use your personal information for the following purposes or as otherwise described at the time of collection:

Service delivery. We may use your personal information to:

- provide our Services to our customers, including using search and machine learning to process decisions you have made about candidates to match other candidates to specific employment positions for prospective employers;
- establish and maintain your user profile on the Service;
- enable security features of the Service, such as by sending you security codes via email or SMS, and remembering devices from which you have previously logged in;
- communicate with you about the Service, including by sending announcements, updates, security alerts, and support and administrative messages;
- understand your needs and interests, and personalize your experience with the Service and our communications; and
- provide support for the Service, and respond to your requests, questions and feedback.

Research and development. We may use your personal information for research and development purposes, including to analyze and improve the Service and our business. We may also use your personal information to provide analytics and benchmarking services, and to generate and disclose statistics regarding use of the Service.

Marketing and advertising. We, our service providers and our third-party advertising partners may collect and use your personal information for marketing and advertising purposes:

- **Direct marketing.** We may send you One Model-related or other direct marketing communications as permitted by law. You may opt-out of our marketing communications as described in the [Opt-out of marketing](#) section below.

Compliance and protection. We may use your personal information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities;
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements or our internal policies;
- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

With your consent. In some cases, we may specifically ask for your consent to collect, use or share your personal information, such as when required by law.

To create anonymous, aggregated or de-identified data. We may create anonymous, aggregated or de-identified data from your personal information and other individuals whose personal information we collect. We make personal information into anonymous, aggregated or de-identified data by removing information that makes the data identifiable to you. We may use this anonymous, aggregated or de-identified data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

How we share your personal information

We may share your personal information with the following parties and as otherwise described in this Privacy Policy or at the time of collection.

Service providers. Third parties that provide services on our behalf or help us operate the Service or our business (such as hosting, information technology, customer support, email delivery, marketing, and website analytics).

Business Customers. When we collect certain personal information, such personal information may be viewed by our business customers. We do not control how our business customers use your personal information.

Professional advisors. Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

Authorities and others. Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the [compliance and protection purposes](#) described above.

Business transferees. Acquirers and other relevant participants in business transactions (or negotiations and diligence for such transactions) involving a corporate divestiture, merger, consolidation, acquisition, reorganization, sale or other disposition of all or any portion of the business or assets of, or equity interests in, One Model or our affiliates (including, in connection with a bankruptcy or similar proceedings).

Your choices

You have the following choices with respect to your personal information.

Access or update your information. If you have registered for an account with us through the Service, you may review and update certain account information by logging into the account.

Opt-out of marketing communications. You may opt-out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by [contacting us](#). Please note that if you choose to opt-out of marketing-related emails, you may continue to receive service-related and other non-marketing emails.

Declining to provide information. We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

Delete your content or close your account. You can choose to delete certain content through your account. If you wish to request to close your account, please [contact us](#).

Other sites and services

The Service may contain links to websites, mobile applications, and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions. We encourage you to read the privacy policies of the other websites and mobile applications and online services you use.

Security

We employ a number of technical, organizational and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your personal information.

International data transfer

We are headquartered in the United States and may use service providers that operate in other countries. Your personal information may be transferred to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country.

Children

The Service is not intended for use by children under 13 years of age. If we learn that we have collected personal information through the Service from a child under 13 without the consent of the child's parent or guardian as required by law, we will delete it. We encourage parents or guardians with concerns to contact us.

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service. If required by law we will also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via email or another manner through the Service. Any

modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Service after the effective date of any modified Privacy Policy indicates your acceptance of the modified Privacy Policy.

How to contact us

- **Email:** privacy@onemodel.co
- **Mail:** 8208 Kirkwall Ct., Austin, Texas 78749
- **Phone:** [Phone Number]

Information for California residents / Your California privacy rights

Scope. This section applies only to California residents. It describes how we collect, use, and share Personal Information of California residents in our capacity as a “business” under the California Consumer Privacy Act (“**CCPA**”) and their rights with respect to that Personal Information. For purposes of this section, the term “**Personal Information**” has the meaning given in the CCPA but does not include information exempted from the scope of the CCPA. In some cases, we may provide a different privacy notice to certain categories of California residents, such as job applicants, in which case that notice will apply instead of this section.

Your California privacy rights. As a California resident, you have the rights listed below. However, these rights are not absolute, and in certain cases we may decline your request as permitted by law.

- **Information.** You can request the following information about how we have collected and used your Personal Information during the past 12 months:
 - The categories of Personal Information that we have collected.
 - The categories of sources from which we collected Personal Information.
 - The business or commercial purpose for collecting and/or selling Personal Information.
 - The categories of third parties with whom we share Personal Information.
 - The categories of Personal Information that we sold or disclosed for a business purpose.
 - The categories of third parties to whom the Personal Information was sold or disclosed for a business purpose.
- **Access.** You can request a copy of the Personal Information that we have collected about you during the past 12 months.
- **Deletion.** You can ask us to delete the Personal Information that we have collected from you.
- **Opt-out of sales. You can opt-out any sale of your Personal Information.**
 - **Opt-in.** If we know that you are 13-15 years of age, we will ask for your affirmative authorization to sell your Personal Information before we do so.
 - **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination as prohibited by the CCPA.

Right to information, access and deletion. You may submit requests to exercise your right to information, access or deletion at [link to webform], calling us toll free at [1-XXX-XXX-XXXX], or via email to privacy@onemodel.co.

Notice of right to opt-out of the “sale” of your Personal Information. Like many companies, we may use services that may be classified under California law as a “sale” of your Personal Information. You can request to opt-out of this “sale” of your personal information here: [Do Not Sell My Personal Information](#), where you will find instructions on opting-out of the use of your information for interest-based advertising.

We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it.

We will need to verify your identity to process your information, access and deletion requests and reserve the right to confirm your California residency. To verify your identity, we may require government identification, a declaration under penalty of perjury or other information. Your authorized agent may make a request on your behalf upon our verification of the agent’s identity and our receipt of a copy of a valid power of attorney given to your authorized agent pursuant to California Probate Code Sections 4000-4465. If you have not provided your agent with such a power of attorney, you must provide your agent with written and signed permission to exercise your CCPA rights on your behalf, provide the information we request to verify your identity, and provide us with confirmation that you have given the authorized agent permission to submit the request.

Personal information that we collect, use and disclose. The chart below summarizes the Personal Information we collect by reference to the categories of Personal Information specified in the CCPA, and describes our practices currently and during the 12 months preceding the effective date of this Privacy Policy. Information you voluntarily provide to us, such as in free-form webforms, may contain other categories of personal information not described below.

Statutory category of personal information (PI) (Cal. Civ. Code § 1798.140)	Source of PI	Business/commercial purpose for collection	Categories of third parties to whom we “disclose” PI for a business purpose	Categories of third parties to whom we “sell” PI
<u>Education Information</u>	Information collected from others	<ul style="list-style-type: none"> • Operate the service • Research and Development • Comply with law • Compliance, fraud prevention, and safety • To create anonymous, aggregated or de-identified data 	<ul style="list-style-type: none"> • Service-related third party vendors • Professional advisors 	Business Customers
<u>Identifiers</u>	Information collected from others	<ul style="list-style-type: none"> • Operate the service • Research and Development • Comply with law • Compliance, fraud prevention, and safety • To create anonymous, 	<ul style="list-style-type: none"> • Service-related third party vendors • Professional advisors 	Business Customers

		aggregated or de-identified data		
<u>Professional or Employment Information</u>	Information collected from others	<ul style="list-style-type: none"> • Operate the service <ul style="list-style-type: none"> • Research and Development • Comply with law • Compliance, fraud prevention, and safety • To create anonymous, aggregated or de-identified data 	<ul style="list-style-type: none"> • Service-related third party vendors • Professional advisors 	Business Customers
<u>Online Identifiers</u>	Information collected from others	<ul style="list-style-type: none"> • Operate the service <ul style="list-style-type: none"> • Research and Development • Comply with law • Compliance, fraud prevention, and safety • To create anonymous, aggregated or de-identified data 	<ul style="list-style-type: none"> • Service-related third party vendors • Professional advisors 	Business Customers
<u>Inferences</u>	May be derived from Information collected from others	<ul style="list-style-type: none"> Operate the service <ul style="list-style-type: none"> • Research and Development • Comply with law • Compliance, fraud prevention, and safety • To create anonymous, aggregated or de-identified data 	<ul style="list-style-type: none"> • Service-related third party vendors • Professional advisors 	Business Customers