

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**") and how we handle personal information that we collect through our digital properties that link to this Privacy Policy, including our website (the "**Service**"), as well as through social media, our marketing activities, and other activities described in this Privacy Policy, as they relate to our One Model People Analytics and One AI products.

One Model's People Analytics and One AI products provide an enterprise data platform built to help businesses analyze Human Resources data. This Privacy Policy does not apply to information that we process on behalf of our business customers while providing the One Model platform/services to them. Our use of this information is governed by our agreements with those business customers. If you have concerns regarding personal information that we process on behalf of a business, please direct your concerns to that business.

Our websites, People Analytics product, and One AI product and services are designed for businesses and their representatives. We do not offer products or services for use by individuals for their personal, family or household purposes. Accordingly, we treat all personal information we collect as pertaining to individuals in their capacities as business representatives and not their individual capacities.

This Privacy Policy does not apply to information that we process in connection with our Labor Market Intel product. You can find information about our Labor Market Intel privacy practices [here](#).

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

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How to contact us

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.
- **Profile data**, such as the username and password that you may set to establish an online account with us, links to your profiles on social networks, preferences, and any other information that you add to your account profile.
- **Professional or Employment Information**, such as employee contact data, demographic information, employment application information, and other information collected from your employees in the course of their employment with your Company.
- **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.
- **User-generated content**, such as comments, questions, messages, and other content or information that you generate, transmit, or otherwise make available on the Service, as well as associated metadata.
- **Relationship data**, such as colleagues or other relationship to third parties whose personal information you may provide to us.
- **Payment information** needed to complete transactions, including payment card information or bank account number.
- **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, 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.

Cookies. Some of our automatic data collection is facilitated by cookies and similar technologies. For more information, see our Cookie Notice.

Cookies and similar technologies. Like many online services, we use the following technologies:

- **Cookies**, which are text files that websites store on a visitor's device to uniquely identify the visitor's browser or to store information or settings in the browser for the purpose of helping you navigate between pages efficiently, remembering your preferences, enabling functionality, helping us understand user activity and patterns, and facilitating analytics and online advertising.
- **Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email address was accessed or opened, or that certain content was viewed or clicked.
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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, operate and improve the Service and our business;
- establish and maintain your user profile on the Service;
- facilitate your invitations to colleagues who you want to invite to join 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.
- **Interest-based advertising.** We may engage third-party advertising companies and social media companies to display ads on our Service and other online services. These companies may use cookies and similar technologies to collect information about your interaction (including the data described in the automatic data collection section above) over time across the Service, our communications and other online services, and use that information to serve online ads that they think will interest you. This is called interest-based advertising. We may also share

information about our users with these companies to facilitate interest-based advertising to those or similar users on other online platforms. You can learn more about your choices for limiting interest-based advertising in the [Your choices](#) section of our Cookie Notice.

To manage our recruiting and process employment applications. We may use personal information, such as information submitted to us in a job application, to facilitate our recruitment activities and process employment applications, such as by evaluating a job candidate for an employment activity, and monitoring recruitment statistics.

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.

Affiliates. Our corporate parent, subsidiaries, and affiliates, for purposes consistent with this Privacy Policy.

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).

Advertising partners. Third-party advertising companies for the [interest-based advertising purposes](#) described above.

Business and marketing partners. Third parties with whom we collaborate on joint activities, with whom we have entered into joint marketing relationships or other joint ventures, or who we think may offer you products or services that you may enjoy.

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).

Other users and the public. Your profile and other user-generated content (except for messages) may be visible to other users of the Service and the public. For example, other users of the Service or the public may have access to your information if you chose to make your profile or other personal information available to them through the Service, such as when you provide comments, reviews, survey responses, or share other content. This information can be seen, collected and used by others, including being cached, copied, screen captured or stored elsewhere by others (e.g., search engines), and we are not responsible for any such use of information.

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.

Cookies. For information about cookies employed by the Service and how to control them, see our Cookie Notice.

Advertising choices. You can limit use of your information for interest-based advertising by:

- **Browser settings.** Blocking third-party cookies in your browser settings.
- **Privacy browsers/plug-ins.** By using privacy browsers or ad-blocking browser plug-ins that let you block tracking technologies.
- **Platform settings.** Google and Facebook offer opt-out features that let you opt-out of use of your information for interest-based advertising:
 - Google: <https://adssettings.google.com/>
 - Facebook: <https://www.facebook.com/about/ads>
- **Ad industry tools.** Opting out of interest-based ads from companies participating in the following industry opt-out programs:
 - Network Advertising Initiative: http://www.networkadvertising.org/managing/opt_out.asp
 - Digital Advertising Alliance: optout.aboutads.info.
 - AppChoices mobile app, available at <https://www.youradchoices.com/appchoices>, which will allow you to opt-out of interest-based ads in mobile apps served by participating members of the Digital Advertising Alliance.
- **Mobile settings.** Using your mobile device settings to limit use of the advertising ID associated with your mobile device for interest-based advertising purposes.

You will need to apply these opt-out settings on each device from which you wish to opt-out.

Please note that we also may work with companies that offer their own opt-out mechanisms and may not participate in the opt-out mechanisms that we linked to above.

Do Not Track. Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

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

Cookie Notice

This Cookie Notice explains how One Model (“**One Model**”, “**we**”, “**us**” or “**our**”) uses cookies and similar technologies in connection with the website and any other website that we own or control and which posts or links to this Cookie Notice (collectively, the “**Sites**”).

What are cookies?

Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies serve different purposes, like helping us understand how a site is being used, letting you navigate between pages efficiently, remembering your preferences, and generally improving your browsing experience.

Our Sites may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer or mobile device until you delete them).

We use two broad categories of cookies: (1) first party cookies, served directly by us to your computer or mobile device, which we use to recognize your computer or mobile device when it revisits our Sites; and (2) third-party cookies, which are served by service providers or business partners on our Sites, and can be used by these parties to recognize your computer or mobile device when it visits other websites. Third-party cookies can be used for a variety of purposes, including site analytics, advertising, and social media features.

What types of cookies and similar tracking technologies does One Model use on the Sites?

On the Sites, we use cookies and other tracking technologies in the following categories described in the table below.

Type	Description	Who serves the cookies (link to privacy policy/site)	How to control them
Advertising	These cookies are used by advertising companies to collect information about how you use our Sites and other websites over time. These companies use this information to show you ads they believe will be relevant to you within our services and elsewhere, and to measure how the ads perform.	Google Doubleclick Facebook	You can opt-out of Google Doubleclick cookies here . You can opt-out of Facebook cookies here . See ‘your choices’ below.

<i>Analytics</i>	These cookies help us understand how our services is performing and being used. These cookies may work with web beacons included in emails we send to track which emails are opened and which links are clicked by recipients.	Google Analytics	<p>You can find out more information about Google Analytics cookies here and about how Google protects your data here. You can prevent the use of Google Analytics relating to your use of our Sites by downloading and installing a browser plugin available here.</p> <p>See 'your choices' below.</p>
<i>Essential</i>	These cookies are necessary to allow the technical operation of our services (e.g., they enable you to move around on a website and to use its features).	Google Tag Manager	See 'your choices' below.
<i>Functionality / performance</i>	Enhance the performance and functionality of our services.		See 'your choices' below.
<i>Social</i>	These cookies may allow you to log into the Sites or App through your social media account or share content in our sites that you find interesting through third-party social media providers. These cookies may also be used for advertising purposes.	Facebook Connect	See 'your choices' below.

Other technologies

In addition to cookies, our Sites may use other technologies, such as Flash technology to pixel tags to collect information automatically.

Browser Web Storage

We may use browser web storage (including via HTML5), also known as locally stored objects (“LSOs”), for similar purposes as cookies. Browser web storage enables the storage of a larger amount of data than cookies. Your web browser may provide functionality to clear your browser web storage.

Flash Technology

We may use Flash cookies (which are also known as Flash Local Shared Object (“Flash LSOs”)) on our Sites to collect and store information about your use of our Sites. Unlike other cookies, Flash cookies cannot be removed or rejected via your browser settings. If you do not want Flash LSOs stored on your computer or mobile device, you can adjust the settings of your Flash player to block Flash LSO storage using the tools contained in the Website Storage Settings Panel. You can also control Flash LSOs by going to the Global Storage Settings Panel and following the instructions. Please note that setting the Flash Player to restrict or limit acceptance of Flash LSOs may reduce or impede the functionality of some Flash applications, including, potentially, Flash applications used in connection with our Sites.

Web Beacons

We may also use web beacons (which are also known as pixel tags and clear GIFs) on our Sites and in our HTML formatted emails to track the actions of users on our Sites and interactions with our emails. Unlike cookies, which are stored on the hard drive of your computer or mobile device by a website, pixel tags are embedded invisibly on webpages or within HTML formatted emails. Pixel tags are used to demonstrate that a webpage was accessed or that certain content was viewed, typically to measure the success of our marketing campaigns or engagement with our emails and to compile statistics about usage of the Sites, so that we can manage our content more effectively.

Mobile Application Software Development Kits (SDKs)

We may use third-party software development kits (“SDKs”) in our mobile applications. A SDK is third-party computer code that may be used for a variety of purposes, including to provide us with analytics regarding the use of our mobile applications, to integrate with social media, add features or functionality to our app, or to facilitate online advertising. SDKs may enable third parties to collect information directly via our App.

Your choices

Your options for controlling what information cookies and similar technologies collect about you include:

- **Blocking cookies in your browser.** Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. Please note that if you set your browser to disable cookies, the Sites may not work properly. For more information about cookies, including how to see what cookies have been set on your device and how to manage and delete them, visit www.allaboutcookies.org. If you do not accept our cookies, you may experience some

inconvenience in your use of our Sites. For example, we may not be able to recognize your computer or mobile device and you may need to log in every time you visit our Sites.

- **Third-party opt-out option.** You can opt-out of interest-based advertising through some of the third parties listed in the chart above by using the corresponding third-party opt-out tool provided in the chart.
- **Industry association opt-outs.** You may opt out of receiving interest-based advertising on websites through members of the Network Advertising Initiative by clicking [here](#) or the Digital Advertising Alliance by clicking [here](#). You may opt out of receiving targeted advertising in mobile apps through participating members of the Digital Advertising Alliance by installing the AppChoices mobile app, available [here](#), and selecting the user's choices. Please note that we also may work with companies that offer their own opt-out mechanisms and may not participate in the opt-out mechanisms linked above.
- **Blocking advertising ID use in your mobile settings.** Your mobile device settings may provide functionality to limit use of the advertising ID associated with your mobile device for interest-based advertising purposes.

For more information about cookies, including how to see what cookies have been set on your computer or mobile device and how to manage and delete them, visit www.allaboutcookies.org. If you do not accept our cookies, you may experience some inconvenience in your use of our Sites. For example, we may not be able to recognize your computer or mobile device and you may need to log in every time you visit our Sites.

If you choose to opt-out of targeted advertisements, you will still see advertisements online, but they may not be relevant to you. Even if you do choose to opt out, not all companies that serve online behavioral advertising are included in this list, and so you may still receive some cookies and tailored advertisements from companies that are not listed.

For more information about how we collect, use and share your information, see our Privacy Policy.

Changes

Information about the cookies we use may be updated from time to time, so please check back on a regular basis for any changes.

Questions

If you have any questions about this Cookie Notice, please contact us by email at privacy@onemodel.co.

Last modified [INSERT DATE].