

# Privacy Policy

***Effective Date: June 25, 2024***

Your privacy is important to us and maintaining your trust is our priority. The jobboard.io website (this “Website”) is owned and operated by ZipRecruiter, Inc. (“ZipRecruiter,” “we,” or “us”). ZipRecruiter respects your privacy and is committed to protecting it through our compliance with this Privacy Policy.

This Privacy Policy provides information as to how ZipRecruiter collects and processes your Personal Data (defined below) through your use of the Website, whether you are just a visitor to our Website or whether you use our Website as a business customer.

It is important that you read this Privacy Policy together with any other privacy notice we may provide on specific occasions when we collect or process Personal Data about you (“Additional Privacy Notices”) so that you are fully aware of how and why we use your Personal Data. This Privacy Policy supplements the Additional Privacy Notices and is not intended to override them. In the event of a conflict between this Privacy Policy and Additional Privacy Notices, the express terms of Additional Privacy Notices will apply to the Personal Data to which they relate.

This 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](#).

## **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://feedback-form.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 [DPF website](#).

**Click on the links below to navigate to the applicable section:**

1. [Who We Are](#)
2. [Key Terms](#)
3. [Data We Collect About You](#)
4. [How Data Is Collected](#)
5. [How We Use Your Data](#)
6. [How We Share Your Data](#)
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## 1. WHO WE ARE

The Website is owned and operated by 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 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](mailto:ZipRecruiterArt27Rep@mcf.ie)

### **UK GDPR Representative:**

ZipRecruiter UK Ltd.  
C/o Fieldfisher LLP  
Riverbank House, 2 Swan Lane  
London, EC4R 3TT, UK  
ATTN: Privacy  
Email: [Art27Rep@ziprecruiter.com](mailto: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 Privacy Policy:

The ZipRecruiter Group	ZipRecruiter, Inc., and its wholly-owned subsidiaries, ZipRecruiter UK Ltd., ZipRecruiter Canada Ltd., and ZipRecruiter Israel Ltd.
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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 pseudonymized 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 (“ <u>Device IDs</u> ”), where required by applicable law.
Sensitive Personal Data	Personal Data that reveals racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership; genetic and biometric data; gender, data concerning health, sex life or sexual orientation, or data otherwise considered “sensitive” or a “special category of personal data” under applicable law.
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:

<b>CATEGORY OF PERSONAL DATA</b>	<b>EXAMPLES OF PERSONAL DATA WE MAY COLLECT UNDER EACH CATEGORY</b>
<b>Identity Data</b>	First name, last name, username, or similar identifier.
<b>Contact Data</b>	Billing address, email address, social media address or handle, telephone number, and other contact information you may provide.
<b>Financial Data</b>	Payment card details or financial account information. However, please note that payment methods (e.g., credit or debit card number and/or bank account details) are not collected by us directly, but by our third-party payment service providers.
<b>Transaction Data</b>	Details about payments to and from you, and details regarding the services that you have subscribed to in relation to this Website.
<b>Technical Data</b>	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.

CATEGORY OF PERSONAL DATA	EXAMPLES OF PERSONAL DATA WE MAY COLLECT UNDER EACH CATEGORY
<b>Profile Data</b>	Your username and password, orders made by you, preferences, feedback and survey responses.
<b>Business Data</b>	Your company name, business address, description, logo, favicon, and company websites.
<b>Usage Data</b>	Information about how you use our Website, products and services.
<b>Marketing and Communications Data</b>	Your preferences in receiving marketing from us and our third parties and 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 be derived from your Personal Data but are not considered Personal Data since they do **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. If You Fail to Provide Personal Data Where Required to Provide 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). In this case, we may have to cancel the service you have with us (or requested from us), and you accept that as a condition of service.

**D. Data That You Should Not Provide to Us**

We do not require you to provide ZipRecruiter with any Sensitive Personal Data about you, except as otherwise noted above. Accordingly, please do not provide this type of personal data to us.

**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 on the Website 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;
- give us some feedback; or
- otherwise submit Personal Data to us.

#### **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 Service Provider (Data Processor)**

ZipRecruiter acknowledges that you have the right to access your personal information. In certain instances, our Jobboard.io clients contract with 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 in providing the Jobboard.io services.

Where ZipRecruiter processes your Personal Data in the capacity of a service provider (data processor) (e.g., if you are a customer of such a ZipRecruiter client) and you seek access, or want to correct, amend, or delete your Personal Data, or have another 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. We may transfer Personal Data to companies that help us provide our services (our subprocessors). Transfers to subsequent third parties are covered by our service agreements with our clients.

We will retain Personal Data that we process on behalf of our clients for as long as needed to provide services to our client. ZipRecruiter will retain this Personal Data as necessary to comply with our legal obligations, resolve disputes, enforce our agreements, and in accordance with our internal record keeping policies.

## 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 as permitted by applicable law (i.e., when we have a business or commercial reason to use your Personal Data). For example, when processing Personal Data from data subjects in the EU, Switzerland and the United Kingdom (collectively, “European Data Subjects”), we will process your Personal Data for the following purposes:

- Where we need to perform the contract we are about to enter into with you or have entered into with you
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests
- Where we need to comply with a legal or regulatory 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 this table as required.

For European Data Subjects, we have also identified in the last column our lawful basis, where appropriate. We have also provided you with an explanation of some of the terms we use in this table:

- **“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).
- **“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.

- **“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.
- **“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](mailto: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
<p><b>Account Creation</b> When you create an account on our Website or sign up for a free trial or paid subscription</p>	<ul style="list-style-type: none"> <li>● Identity Data</li> <li>● Contact Data</li> <li>● Financial Data</li> <li>● Business Data</li> <li>● Technical Data</li> <li>● Transaction Data</li> <li>● Profile Data</li> <li>● 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</li> </ul>	<ul style="list-style-type: none"> <li>● To process your request and set up your account</li> <li>● To enable you to receive our services</li> <li>● To manage our relationship with you</li> <li>● 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</li> <li>● To collect monies owed to us</li> <li>● To communicate with you regarding our services</li> </ul>	<ul style="list-style-type: none"> <li>● To perform our contract with you so you can use our services</li> <li>● For our legitimate interests to receive and/or recover monies owed to us, to operate our business, and to keep our records updated</li> </ul>
<p><b>Website Administration</b></p>	<ul style="list-style-type: none"> <li>● Identity Data</li> <li>● Contact Data</li> <li>● Business Data</li> <li>● Technical Data</li> </ul>	<ul style="list-style-type: none"> <li>● To provide administration and IT services, network security, to prevent fraud</li> <li>● To troubleshoot</li> <li>● To perform data analysis, testing, system maintenance, support,</li> </ul>	<ul style="list-style-type: none"> <li>● For our legitimate interests to running our business</li> <li>● To perform our contract with you and provide services to you</li> </ul>



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
		<p>reporting and hosting of data</p> <ul style="list-style-type: none"> <li>● To run analytics or collect statistics</li> <li>● To monitor and improve our Website, services, and your user experience</li> </ul>	
<p><b>Online Browsing</b> Where your Personal Data may be collected by cookies or similar technologies and data analytics</p>	<ul style="list-style-type: none"> <li>● Usage Data such as where you came from; login details; pages you looked at; duration of your visit; and/or specifics of the services you have selected</li> <li>● Technical Data such as your IP address; browser information; device information; and/or your unique ID and the expiration date of the ID</li> </ul>	<ul style="list-style-type: none"> <li>● To improve our Website, products/services and your user experience</li> <li>● To run analytics and collect statistics</li> <li>● 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.</li> <li>● Understand how you discovered our Website</li> </ul>	<ul style="list-style-type: none"> <li>● For our legitimate interests to analyze and improve our Website and services; to improve your user experience; to better engage with you; and to keep our Website updated and relevant</li> <li>● Consent, when required, to store cookies on your device</li> </ul>
<p><b>Promotions</b> Where we make suggestions and recommendations to you about products and/or services that may be of interest to you</p>	<ul style="list-style-type: none"> <li>● Identity Data</li> <li>● Contact Data</li> <li>● Business Data</li> <li>● Technical Data</li> <li>● Usage Data</li> <li>● Profile Data</li> </ul>	<ul style="list-style-type: none"> <li>● To form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you to optimize your use of our services</li> </ul>	<ul style="list-style-type: none"> <li>● Necessary for our legitimate interests (to develop our products/services and grow our business)</li> </ul>
<p><b>Enquiries and Messaging Initiated by You</b></p>	<ul style="list-style-type: none"> <li>● Identity Data</li> <li>● Contact Data</li> <li>● Business Data</li> </ul>	<ul style="list-style-type: none"> <li>● Answer and manage your enquiries</li> </ul>	<ul style="list-style-type: none"> <li>● Performance of our contract with you</li> </ul>

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
Where your personal data is collected when you ask questions relating to our services and/or your account	<ul style="list-style-type: none"> <li>● Profile Data</li> <li>● Other personal data you provide in relation to your enquiry</li> <li>● Content of chats, messages, or enquiries; number of messages you've sent and received; when you viewed a message; who responded to your chats</li> </ul>	<ul style="list-style-type: none"> <li>● Run analytics and statistics</li> <li>● Add your questions or concerns to your profile so we can understand your interests and preferences</li> <li>● Troubleshoot any problems that you are experiencing</li> </ul>	<ul style="list-style-type: none"> <li>● Our legitimate interests: (i) to better engage with you; and (ii) to enter into a contract with you</li> <li>● Where we need to comply with a legal or regulatory obligation (data subject access rights)</li> </ul>

**6. HOW WE SHARE OR DISCLOSE YOUR DATA**

**A. Personal Data**

We may share Personal Data with the following 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 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 [Terms of Use](#) 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 to us on the Website.
- **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
<b>Identity Data, Contact Data, Transaction Data, Technical Data, Profile Data, Business Information, Usage Data, and Marketing and Communications Data</b>	<ul style="list-style-type: none"> <li>● ZipRecruiter Group</li> <li>● Service providers, vendors, contractors</li> <li>● Advertising partners or advertising networks</li> <li>● Professional advertisers</li> <li>● Third parties for a specific business purpose</li> <li>● Third parties for purposes of a business transfer</li> <li>● Third parties with your consent</li> <li>● Government entities</li> </ul>
<b>Financial Data</b>	<ul style="list-style-type: none"> <li>● ZipRecruiter Group</li> <li>● Service providers, vendors, contractors</li> <li>● Professional advertisers</li> <li>● Third parties for a specific business purpose</li> <li>● Third parties for purposes of a business transfer</li> <li>● Third parties with your consent</li> <li>● Government entities</li> </ul>

**B. 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.

**C. 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.

Where permitted under applicable law, after you visit our Website, 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 Website 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 [Cookie Policy](#) 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 the Website:

- 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 on the Website is transferred to the USA and/or to another country where we have a subsidiary or where we have engaged service providers (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](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 (“[Data Privacy Framework](#)”), and the Data Privacy Framework, 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 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 destroy 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

You may have different privacy rights under applicable laws depending on the country you are in when you visit or access our Website.

**For European Data Subjects**, you have the following rights with respect to your Personal Data:

<b>YOUR RIGHTS</b>	<b>WHAT CAN YOU REQUEST</b>
Right to <b>Information</b>	The right to know what Personal Data we hold about you and how we use it.
Right to <b>Access</b>	The right to be provided with a copy of your Personal Data (subject to certain restrictions).
Right of <b>Rectification</b>	The right to require us to correct any incomplete or inaccurate Personal Data we 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 <b>Erasure/Be Forgotten</b>	This enables you to ask us to delete or remove Personal Data where there is no good reason for us to continue to process it. Note, however, that we may not always be able to comply with your request for erasure and in such circumstances, will notify our reasons to you.
Right to <b>Restrict Processing</b>	The right to require us to restrict processing of your Personal Data, i.e., you can 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 <b>Data Portability</b>	In certain circumstances, you have the right to request the transfer of your Personal Data to you or to a third party in a commonly used machine-readable format. Note, however,

<b>YOUR RIGHTS</b>	<b>WHAT CAN YOU REQUEST</b>
	that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
<b>Right to Object to Processing</b>	You have the right to object to the processing of your Personal Data in the 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.
<b>Right to Withdraw Consent at Any Time</b>	You have the right to withdraw your consent at any time where we are relying on consent to process your Personal Data. 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.
<b>Right Not To Be Subject To A Decision Based Solely On Automated Decision-Making</b>	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you. However, your right does not apply if: (i) you gave us your explicit consent to use your personal data to make our decision; (ii) we are allowed by law to make our decision; or (iii) our automated decision was necessary to enable us to enter into a contract with you.

**For data subjects outside the EEA, Switzerland, and U.K.:** Depending on applicable law, you may have the following rights with respect to your Personal Data:

<b>YOUR RIGHTS</b>	<b>WHAT CAN YOU REQUEST</b>
<b>Right to Information</b>	The right to know whether we process Personal Data about you and, if so, what Personal Data we hold about you and how we use it.
<b>Right of Access</b>	The right to be provided with a copy of your Personal Data (subject to certain restrictions under applicable law).
<b>Right to Delete</b>	Where required under applicable law, the right to request that we delete your Personal Data (subject to certain restrictions under applicable law).
<b>Right of Rectification/Correction</b>	The right to require us to correct any incomplete or inaccurate Personal Data we 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.
<b>Right to Withdraw</b>	You have the right to withdraw your consent at any time where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your

YOUR RIGHTS	WHAT CAN YOU REQUEST
<b>Consent At Any Time</b>	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.
<b>Right to Opt-Out of Sale/Targeted Advertising</b>	Where required under applicable law, you have the right to opt-out of the sales of your Personal Data or the processing of your Personal Data for purposes of targeted advertising. To submit an opt-out request, you (or your authorized representative) may visit our <a href="#">Notice of Right to Opt-Out</a> page.

If you have any complaints about how ZipRecruiter handles Personal Data, please send an email to [dsars@ziprecruiter.com](mailto:dsars@ziprecruiter.com), and identify that your request relates to the Jobboard.io Website. 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 [dsars@ziprecruiter.com](mailto:dsars@ziprecruiter.com) and identify that the request relates to the Jobboard.io Website. 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](mailto:dsars@ziprecruiter.com), and identifying that your request relates to the Jobboard.io Website.

#### **A. 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 [dsars@ziprecruiter.com](mailto:dsars@ziprecruiter.com) with your specific request and identify that your request relates to the Jobboard.io Website. We will respond to your request within a reasonable timeframe.

#### **B. 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.



### **C. 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](mailto: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.

### **D. 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.

## **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 [privacy@ziprecruiter.com](mailto:privacy@ziprecruiter.com) or mail us at the address provided in Section 18 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 who resides in the State of California, you can view our "California Privacy Notice" for Jobboard.io [here](#).

## **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 from European Data Subjects, or where otherwise required in accordance with applicable law. You may unsubscribe from our marketing emails by clicking "Unsubscribe" in any promotional email communications we send you. As permitted by applicable law, you cannot opt-out of non-marketing, services-related notices.

## **12. COOKIES & TRACKING TECHNOLOGIES**

ZipRecruiter and third parties may use cookies or other 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, 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 policy regarding [Cookie Policy](#).

If you are accessing the Website from a location outside the EEA or U.K., 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 may partner with a third party to either display advertising on our Website or to manage our advertising on other sites. Our third party partner 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, click [here](#); or if you are located in the European Union, click [here](#). Please note that you will continue to receive generic ads.

## **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. 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](mailto:dsars@ziprecruiter.com), and specify the country in which you are located and identify that the request relates to the Jobboard.io Website. We welcome the opportunity to help you with any concern or questions you have about the use of our Website or services.

If we are not able to address your concern and if you are a European Data Subject, 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](http://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>.

## **16. 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 any account you may have 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.

## **17. 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](mailto:dsars@ziprecruiter.com).

## **18. HOW TO CONTACT US**

**Data Privacy Questions or Requests.** 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 identify that the request relates to the Jobboard.io Website.

TYPE OF ENQUIRY	EMAIL ADDRESS	MAILING ADDRESS	TELEPHONE	LIVE CHAT
Data Subject Information/Rights Requests	<a href="mailto:dsars@ziprecruiter.com">dsars@ziprecruiter.com</a>	See Below	Send Request by Mail or Email	Send Request by Mail or Email
Privacy-Related Questions	<a href="mailto:dsars@ziprecruiter.com">dsars@ziprecruiter.com</a>	See Below	Send Request by Mail or Email	Send Request by Mail or Email

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

- **Email Address:** [support@jobboard.io](mailto:support@jobboard.io)
- **Mailing Address:** See Below
- **Telephone:** 1-843-580-3860 (9am – 9pm EST)
- **Live Chat Function:** Available on the Website

**Mailing Addresses**

U.S. MAILING ADDRESS	U.K. MAILING ADDRESS
ZipRecruiter, Inc. Attn: Business Affairs 604 Arizona Avenue, Santa Monica, CA 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	
<b>EU GDPR Representative:</b> ZipRecruiter, Inc. C/o MCF Legal Technology Solutions Limited Riverside One Sir John Rogerson's Quay Dublin 2, D02 X576, Ireland Email: <a href="mailto:ZipRecruiterArt27Rep@mcf.ie">ZipRecruiterArt27Rep@mcf.ie</a>	<b>U.K. GDPR Representative:</b> ZipRecruiter UK Ltd. C/o Fieldfisher LLP Attn: Privacy Riverbank House, 2 Swan Lane, London EC4R 3TT, England, UK Email: <a href="mailto:art27rep@ziprecruiter.com">art27rep@ziprecruiter.com</a>