

# Privacy Policy

Last Updated: July 1, 2020

Censia is a web-based software solution that allows recruiting professionals to recruit faster, smarter, and better by using predictive algorithms and data-backed insights. We gather information about our users, customers, those that interact with our website or services, potential job candidates, and employees.

This Privacy Policy describes how Censia (“Censia,” “we,” “us,” or “our”) collects, uses, shares, and safeguards personal information. This Privacy Policy also tells you about your rights and choices with respect to your personal information, and how you can reach us to get answers to your questions. You can jump to particular topics by going to the headings below:

- [Types Of Information We Collect](#)
- [Use And Processing Of Information](#)
- [Sharing Of Information](#)
- [Your Choices](#)
- [How We Protect Personal Information](#)
- [Privacy Shield](#)
- [Cookies](#)
- [Miscellaneous](#)
- [Information for California Residents](#)
- [Contact Information and Requests](#)

## TYPES OF INFORMATION WE COLLECT

The following provides examples of the type of information that we collect from you and how we use that information.

Context	Types of Data	Primary Purpose for Collection and Use of Data
Account Registration	We collect your name, email address, and contact information when you create an account. We also collect information relating to the actions that you perform while logged into your account.	We have a legitimate interest in providing account-related functionalities to our users. Accounts can be used to access our services and to save your preferences.

Candidate Profile	Censia creates potential job candidate profiles for our customers' use. These contain information Censia has gathered from publicly available sources, purchased from data brokers, or from the candidate themselves and includes contact information, education and employment information, demographic information, and background information. The profile may also include candidate information provided to our customers.	<p>For some data used in candidate profiles, this Privacy Policy applies. This information includes information provided directly to Censia by the candidate and information Censia gathers from publicly available sources or purchased from data brokers.</p> <p>For other candidate profile information, Censia acts as a processor or service provider to the customer providing the information. Accordingly, the customer's privacy policy governs our use of the information. Typically, Censia processes this information at the direction of the customer in order to aid in applicant screening.</p>
Customer Information	We collect the name, and contact information, of our customers and their employees with whom we may interact.	We have a legitimate interest in contacting our customers and communicating with them concerning normal business administration such as projects, services, and billing.
Cookies and first party tracking	We use cookies and clear GIFs. "Cookies" are small pieces of information that a website sends to a computer's hard drive while a website is viewed. See the <a href="#">Cookies Section</a> for more information.	We have a legitimate interest in making our website operate efficiently. Additionally, we also collect consent for the placement of some of these cookies.
Cookies and Third-Party Tracking	We participate in behavior-based advertising, this means that a third party uses technology (e.g., a cookie) to collect information about your use of our website so that they can provide advertising about products and services tailored to your interests on our website, or on other websites. See our <a href="#">Cookies Section</a> for more information.	We collect consent for the placement of these cookies.
Demographic Information	We collect demographic information, such as your age, ethnicity, or location.	We have a legitimate interest in understanding our users and providing tailored services. Some information is also collected as part of the employment process to comply with applicable law. Location information may also be collected to build a more complete candidate profile.
Email Interconnectivity	If you receive email from us, we use certain tools to capture data related to when you open our message, click on any links or banners it contains and makes purchases.	We have a legitimate interest in understanding how you interact with our communications to you.
Employment at Censia	If you apply for a job posting or become an employee, we collect information necessary	We use information about current employees to perform our contract of employment or the

	<p>to process your application or to retain you as an employee. This may include, among other things, your Social Security Number. Providing this information is required for employment.</p>	<p>anticipation of a contract of employment with you. In some contexts, we are also required by law to collect information about our employees. We also have a legitimate interest in using your information to have efficient staffing and workforce operations.</p>
Feedback/Support/ Demos	<p>If you provide us feedback, request a demo, or contact us for the support we will collect your name and e-mail address, as well as any other content that you send to us, in order to reply.</p>	<p>We have a legitimate interest in receiving and acting upon your feedback or issues. Additionally, you may also consent to these communications by requesting them.</p>
Information from Customers	<p>Censia may receive information from our customers. This information includes, for example, any information you provide to our customer in connection with an employment application.</p>	<p>Censia acts as a processor or service provider to the customer providing the information. Accordingly, the customer’s privacy policy governs our use of the information. Typically, Censia processes this information in the direction of the customer in order to aid in applicant screening.</p>
Inquiries and Leads	<p>Censia collects name, company, and contact information from people who enquire about our services or about possible leads who may be interested in our services. Additionally, we may acquire or purchase this lead information from third parties.</p>	<p>We have a legitimate interest and responding to inquiries regarding our services in order to increase business. Additionally, you may also consent to these communications by requesting them.</p>
Mailing Lists	<p>When you sign up for our mailing list, we collect your email and postal address.</p>	<p>We share information about our products and services with individuals that consent to receive such information. We also have a legitimate interest in sharing information about our products or services.</p>
Mobile Devices	<p>We collect information from your mobile device such as unique identifying information broadcast from your device when visiting our website or when using our services.</p>	<p>We have a legitimate interest in identifying unique visitors, and in understanding how users interact with us on their mobile— devices.</p>
Payment Information	<p>We collect your name, billing address, e-mail address, phone number, and credit card number, ACH information, or other billing information when you purchase services.</p>	<p>We use your information to perform our contract to provide you with services.</p>
Publicly Available Information	<p>Censia collects publicly available information from sources like college databases, social media, LinkedIn, and other sources. This information typically includes education and employment history. Some of this information may be purchased from a data</p>	<p>We have a legitimate interest in collecting information about job applicants on our customer’s behalf in order to provide our services.</p>

	broker who collected it from a publicly available source and organized it according to our needs?	
Surveys	When you participate in a survey, we collect information that you provide through the survey. If the survey is provided by a third-party service provider, the third party's privacy policy applies to the collection, use, and disclosure of your information.	We have a legitimate interest in understanding your opinions and collecting information relevant to our organization. Additionally, you may consent to this processing by electing to participate in the survey.
Website interactions	We use technology to monitor how you interact with our website. This may include which links you click on, or information that you type into our online forms. This may also include information about your device or browser.	We have a legitimate interest in understanding how you interact with our website to better improve it. We also have a legitimate interest in detecting and preventing fraud.
Weblogs	We collect information, including your browser type, operating system, Internet Protocol (IP) address (a number that is automatically assigned to a computer when the Internet is used), domain name, click-activity, referring website, and/or a date/time stamp for visitors.	We have a legitimate interest in monitoring our networks and visitors to our websites. Among other things, it helps us understand the usage of our website and services.

In addition to the information that we collect from you directly, we may also receive information about you from other sources, including third parties, business partners, our affiliates, or publicly available sources. For example, if you submit a job application, or become an employee, we may conduct a background check.

## USE AND PROCESSING OF INFORMATION

In addition to the purposes and uses described above, we use information in the following ways:

- To identify you when you visit our websites or use our services.
- To provide services to you.
- To improve our services and offerings.
- For billing and payment purposes.
- To conduct analytics.
- To respond to inquiries related to support, employment opportunities, or other requests.
- To send marketing and promotional materials.

- For internal administrative purposes, as well as to manage our relationships.

Although the sections above describe our primary purpose in collecting your information, in many situations we have more than one purpose. For example, if you purchase services we may collect your information to perform our contract with you, but we also collect your information as we have a legitimate interest in maintaining your information after your transaction is complete so that we can quickly and easily respond to inquiries about the services you purchased. As a result, our collection and processing of your information are based in different contexts upon your consent, our need to perform a contract, our obligations under the law, and/or our legitimate interest in conducting our business.

### Algorithmic Analysis

Censia has developed proprietary algorithms that it sometimes uses on information collected about individuals. The purpose of these algorithms is to identify patterns of behavior, either unique to an individual or to defined categories of people, which may enhance a customer's use of the services. These algorithms produce a high-level analysis of job candidates that a hiring employer may use to inform their decisions about the application but do not in themselves reject candidates or make similar automated decisions. Customers make all employment decisions themselves.

## SHARING OF INFORMATION

In addition to the specific situations discussed elsewhere in this policy, we disclose information in the following situations:

1. **Affiliates and Acquisitions.** We may share information with future corporate affiliates (e.g., parent company, sister companies, subsidiaries, joint ventures, or other companies under common control). If another company acquires or plans to acquire, our company, business, or our assets, we will also share information with that company, including at the negotiation stage.
2. **Our Customers.** We share information with our customers (or their third-party recruiters) so that they can evaluate candidates for employment. Typically, you have applied for a job posting with that customer and the customer is using Censia to help evaluate your application. In those scenarios, the Customer's privacy policy, not this Policy, may apply to all or some of the data shared with the customer.
3. **Other Disclosures with Your Consent.** We may ask if you would like us to share your information with other unaffiliated third parties who are not described elsewhere in this policy.
4. **Other Disclosures without Your Consent, Including Law Enforcement.** We may disclose information in response to subpoenas, warrants, or court orders, or in connection with any legal process, or to comply with relevant laws, including to

meet national security or law enforcement requirements. We may also share your information in order to establish or exercise our rights, to defend against a legal claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, the safety of person or property, or a violation of our policies, or to comply with your request for the shipment of products to or the provision of services by a third-party intermediary.

5. **Service Providers.** We share your information with service providers. Among other things, service providers help us to administer our website, conduct surveys, administer webinars, field events, provide technical support, process payments, and assist in the fulfillment of services and evaluation of candidates.

## YOUR CHOICES

You can make the following choices regarding your personal information if required of Censia by applicable law:

1. **Access To Your Personal Information.** You may request access to your personal information by contacting us using the information below. If required by law, upon request, we will grant you reasonable access to the personal information that we have about you. Note that California residents may be entitled to ask us for a notice describing what categories of personal information (if any) we share with third parties or affiliates for direct marketing.
2. **Changes To Your Personal Information.** We rely on you to update and correct your personal information. Most of our websites allow you to modify or delete your account profile. Note that we may keep historical information in our backup files as permitted by law. If our website does not permit you to update or correct certain information, contact us using the contact information below.
3. **Deletion Of Your Personal Information.** Typically, we retain your personal information for the period necessary to fulfill the purposes outlined in this policy unless a longer retention period is required or permitted by law. You may, however, request information about how long we keep a specific type of information or request that we delete your personal information by contacting us using the contact information below. If required by law we will grant a request to delete information, but you should note that in many situations we must keep your personal information to comply with our legal obligations, resolve disputes, enforce our agreements, or for another one of our business purposes. If you have an account with us, some of your information may be deleted via the account functionality or by closing the account.
4. **Opt-Out of Sale of Personal Information.** Censia sells some types of personal information. You can opt-out of having your information sold using the methods described in the Contact Information and Requests section below. We do not have actual knowledge that we sell any personal information of a minor under the age 16.

5. **Objection to Certain Processing.** In certain situations, you may object to our use or disclosure of your personal information by contacting us using the contact information below.
6. **Data Portability.** You may request your data be provided to you in a portable and usable format using the methods described in the Contact Information and Requests section below.
7. **Online Tracking.** We do not currently recognize automated browser signals regarding tracking mechanisms, which may include “Do Not Track” instructions.
8. **Promotional Emails.** You may choose to provide us with your email address for the purpose of allowing us to send promotional materials to you. You can stop receiving promotional emails by following the unsubscribe instructions in e-mails that you receive. If you decide not to receive promotional emails, we may still send you service-related communications.
9. **Promotional Mail.** You may contact us at the contact information below to stop receiving promotional mail from Censia.
10. **Revocation Of Consent.** If you revoke your consent for the processing of personal information, then we may no longer be able to provide you services. In some cases, we may limit or deny your request to revoke consent if the law permits or requires us to do so, or if we are unable to adequately verify your identity. You may revoke consent to processing (where such processing is based upon consent) by contacting us at the address described below.
11. **Privacy Shield Opt Out.** EU Individuals may have the right to limit the use and disclosure of their personal information as required by the Privacy Shield’s Principles, such as whether your personal information is disclosed to a third party or used for purposes materially different from the purpose for which the personal information was originally collected or subsequently authorized by you. If you wish to limit the use and disclosure of personal information in accordance with the Privacy Shield Principles, please contact us at [support@censia.com](mailto:support@censia.com).

## HOW WE PROTECT PERSONAL INFORMATION

No method of transmission over the Internet, or method of electronic storage, is fully secure. While we use reasonable efforts to protect your personal information from unauthorized access, use, or disclosure, we cannot guarantee the security of your personal information. In the event that we are required by law to inform you of a breach to your personal information, we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

You may be able to create an account with Censia. When you do you will be prompted to create a password. You are responsible for maintaining the confidentiality of your password, and you are responsible for any access to or use of your account by someone else that has obtained your password, whether or not such access or use has

been authorized by you. You should notify us of any unauthorized use of your password or account.

## PRIVACY SHIELD

Censia encourages you to first contact Censia directly, using the contact information below, to resolve your complaint or question. Censia complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. Censia has certified to the Department of Commerce that it adheres to the [Privacy Shield Principles](#). If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>. The list of entities that are a part of Privacy Shield can be found at <https://www.privacyshield.gov/list>.

Under Privacy Shield, certain individuals have a right to have their complaints addressed by JAMS, <https://www.jamsadr.com/eu-us-privacy-shield>, an independent dispute resolution, body free of charge. Some individuals may be able to invoke binding arbitration to settle privacy complaints and issues. To learn more about arbitration under Privacy Shield, please visit <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>.

Censia also remains liable, under Privacy Shield, for its onward transfers to third parties. As part of Privacy Shield, Censia submits to the investigatory and enforcement powers of the United States Federal Trade Commission.

## COOKIES

A cookie is a small file placed onto your device that enables a variety of features and functionality. Cookies can do this because websites can read and write them, enabling websites to recognize you and remember important information that will make your use of a website more convenient (for example by remembering preference settings).

We use a variety of cookie types:

- Preference Cookies. Preference cookies collect information about your choices and preferences and allow us to remember language or other local settings and customize the websites accordingly.
- Strictly Necessary Cookies. Strictly necessary cookies are necessary for the website to work and to enable you to move around it and to use its features. Without these cookies, websites will not perform as intended and we may not be able to provide our website or certain services or features you request.



- Analytics Cookies. Analytics cookies collect information about your use of the website and enable us to improve the way it works. For example, analytics cookies show us which are the most frequently visited pages on a website, help us record any difficulties you have with a website, and show us whether our advertising is effective or not. This allows us to see the overall patterns of usage, rather than the usage of a single person.
- Advertising Cookies. Advertising cookies are used for marketing purposes.

Most browsers allow you to control and erase cookies through their settings preferences. Note that if you limit the ability of websites to set cookies, you may worsen your overall user experience, since it will no longer be personalized to you. Additionally, some features may work improperly or not at all.

## MISCELLANEOUS

The following additional information relates to our privacy practices:

- **Transmission Of Information To Other Countries.** Your information may be processed in a foreign country where privacy laws may be less stringent than the laws in your country, including the United States. Nonetheless, where possible we take steps to treat personal information using the same privacy principles that apply pursuant to the law of the country in which we first received your information. By submitting your personal information to us you agree to the transfer, storage, and processing of your information in a country other than your country of residence including, but not necessarily limited to, the United States. If you would like more information concerning our attempts to apply the privacy principles applicable in one jurisdiction to data when it goes to another jurisdiction you can contact us using the contact information below.
- **Third-Party Applications/Websites.** We have no control over the privacy practices of websites or applications that we do not own.
- **Accessibility.** If you are visually impaired, you may access this notice through your browser's audio reader.
- **Changes To This Privacy Policy.** We may change our privacy policy and practices over time. To the extent that our policy changes in a material way, we will update the privacy policy on our website and make efforts to make such updates conspicuous, such as using a banner, and the policy that was in place at the time that you submitted personal information to us will generally govern that information unless we receive your consent to the new privacy policy. We will note the last update date of the latest version at the beginning of this Privacy Policy.

## INFORMATION FOR CALIFORNIA RESIDENTS

- California Civil Code Sections 1798.115(c), 1798.130(a)(5)(c), 1798.130(c), and 1798.140 indicate that organizations should disclose whether certain categories of information are collected, “sold” or transferred for an organization’s “business purpose” (as those terms are defined under California law). You can find a list of the categories of information that we collect and share [here](#). Please note that because this list is comprehensive it may refer to types of information that we share about people other than yourself. If you would like more information concerning the categories of personal information (if any) we share with third parties or affiliates for those parties to use for direct marketing, please submit a written request to us using the information in the “Contact Information” section below. We do not discriminate against California residents who exercise any of their rights described in this Privacy Policy, The following chart contains statistics about CCPA consumer data requests received in 2019.

	Total Received	Complied with in whole or in part	Denied
Access Requests	0	0	0
Deletion Requests	0	0	0
Opt-out of Sale Requests	0	0	0
Median days responded	N/A		

## CONTACT INFORMATION AND REQUESTS

If you would like to submit a data subject request (as described by the “Your Choices” section above) please use one of the following:

<https://support.censia.com/hc/en-us/requests/new>

**1 (888) 510-2253 Toll-Free**

If you have any questions, comments, or complaints concerning our privacy practices please contact us at the appropriate address below. We will attempt to respond to your requests and to provide you with additional privacy-related information.

[support@censia.com](mailto:support@censia.com)

**1 (888) 510-2253 Toll-Free**

Censia  
Attn: Legal Department  
450 Geary Street  
Suite 501  
San Francisco, CA 94102

Note that, as required by law, we will require you to prove your identity. We may verify your identity by a phone call or email. Depending on your request, we will ask for information such as your name, career or education information, or other contact information that may be associated with you. We may also ask you to provide a signed declaration confirming your identity. Following a request, we will use reasonable efforts to supply, correct or delete personal information about you in our files.

In some circumstances, you may designate an authorized agent to submit requests to exercise certain privacy rights on your behalf. We will require verification that you provided the authorized agent permission to make a request on your behalf. You must provide us with a copy of the signed permission you have given to the authorized agent to submit the request on your behalf and verify your own identity directly with us. If you are an authorized agent submitting a request on behalf of an individual, you must attach a copy of the following information to the request:

1. A completed Authorized Agent Designation Form indicating that you have the authorization to act on the consumer's behalf.
2. If you are a business, proof that you are registered with the Secretary of State to conduct business in California.

If we do not receive both pieces of information, the request will be denied.

If you are not satisfied with our response and are in the European Union, you may have a right to lodge a complaint with your local supervisory authority.

In compliance with the Privacy Shield Principles, Censia commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact Censia by sending an email to [support@censia.com](mailto:support@censia.com). Please include your email address or contact information so we can respond to your request appropriately.

Censia has further committed to refer unresolved Privacy Shield complaints to the relevant U.S. enforcement authority, the Federal Trade Commission (FTC). To submit a complaint to the FTC, click [here](#).

**Effective Date: 02/24/2020**

### CALIFORNIA INFORMATION-SHARING DISCLOSURE

California Civil Code Sections 1798.115(c), 1798.130(a)(5)(c), 1798.130(c), and 1798.140 indicate that organizations should disclose whether the following categories of personal information are collected, transferred for “valuable consideration,” or transferred for an organization’s “business purpose” (as those terms are defined under California law). The table below indicates the categories of personal information we collect and transfer in a variety of contexts. Please note that because this list is comprehensive, it may refer to the types of information that we collect and share about people other than yourself. For example, while we transfer credit card or debit card numbers for our business purpose in order to process payments for orders placed with us, we do not collect or transfer credit card or debit card numbers of individuals that submit questions through our website’s “contact us” page.

Categories of Personal Information	Personal Information Collected	Disclosed for a Business Purpose	Sold
Identifiers  Disclosed to service providers, internet service providers, data analytics providers, government entities and law enforcement as required by law, professional services providers.  Sold to potential employers.	Name or alias	✓	✓
	Contact information (such as name, address, and telephone number, e-mail address)	✓	✓
	Unique Identifiers (e.g., cookies, pixel tags, device identifier, and attributes, etc.)	✓	✓

	Online identifiers (such as internet protocol address)	✓	✓
<p>Characteristics of legally protected classifications</p> <p>Disclosed to service providers government entities and law enforcement as required by law, professional services providers.</p>	Race	✓	<input type="checkbox"/>
	Ethnicity	✓	<input type="checkbox"/>
	Gender	✓	<input type="checkbox"/>
<p>Commercial Information</p> <p>Disclosed to service providers, internet service providers, data analytics providers, government entities and law enforcement as required by law, professional services providers.</p>	Information about products and services obtained from us	✓	<input type="checkbox"/>
	Individual's preferences	✓	<input type="checkbox"/>
<p>Internet/ Electronic Activity</p> <p>Disclosed to service providers, internet service providers, data analytics providers, government entities and law enforcement as required by law,</p>	Browsing and/or search history	✓	✓
	Information about interactions with our website, mobile application, or advertisements	✓	✓

<p>professional services providers.</p> <p>Sold to potential employers, advertising networks.</p>			
<p>Professional/employment information</p> <p>Disclosed to service providers, internet service providers, data analytics providers, government entities and law enforcement as required by law, professional services providers.</p> <p>Sold to potential employers.</p>	Occupation	✓	✓
	Employment history	✓	✓
	Professional references	✓	✓
<p>Education information (ie., personally identifiable information contained in education records)</p> <p>Disclosed to service providers, internet service providers, data analytics providers, government entities and law enforcement as required by law, professional services providers.</p>	Student name	✓	<input type="checkbox"/>
	Address of student or student' family	✓	<input type="checkbox"/>
	Other indirect identifiers, such as the student's date of birth, place of birth, and mother's maiden name	✓	<input type="checkbox"/>
	Other information that alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances,	✓	<input type="checkbox"/>

	to identify the student with reasonable certainty		
<p>Inferences are drawn from any of the above information</p> <p>Disclosed to service providers, internet service providers, data analytics providers, government entities and law enforcement as required by law, professional services providers.</p> <p>Sold to potential employers, advertising networks.</p>		✓	✓