

LAST UPDATED: October 18, 2024

FLO RECRUIT, INC.

PRIVACY POLICY

Flo Recruit, Inc. ("Flo Recruit," "we" or "us") wants you to be familiar with how we collect, use, and disclose information. This Privacy Policy describes our practices in connection with information that we collect through:

- This website operated by us from which you are accessing this Privacy Policy;
- Our social media pages that we control from which you are accessing this Privacy Policy;
- Software applications made available by us for use on a SaaS basis or through our website (the "**Apps**");
- HTML-formatted email messages that we send to you that link to this Privacy Policy or other communications we have with you; and
- Offline business interactions you have with us.

Collectively, we refer to the webServices, social media pages, Apps, communications, and offline business interactions, including the marketing and sale of our products, as the "**Services**."

If you are a resident of California, Colorado, Connecticut, Utah, or Virginia, please see "Additional Information for Residents of California, Colorado, Connecticut, Utah, and Virginia," below, for more information about our privacy practices and your rights.

PERSONAL INFORMATION

"**Personal Information**" is information that identifies you as an individual or relates to an identifiable individual. We collect Personal Information through or in connection with the Services, such as:

- First and last name
- Company name
- Title
- Email address
- IP address
- Login user name and password
- Mailing address
- Telephone number
- Personal preferences regarding services
- Location

Personal Information we receive from third party sources: Some third parties such as our business partners and service providers provide us with Personal Information about you, such as the following:

- Account information for third party services: If you interact with a third party

service when using our Services, such as if you use a third party service to log-in to our Services (e.g., LinkedIn), or if you share content from our Services through a third party social media service, the third party service will send us information about you, such as information from your public profile, if the third party service and your account settings allow such sharing. The information we receive will depend on the policies and your account settings with the third-party service.

- Personal Information from our advertising partners: We receive information about you from some of our service providers who assist us with marketing or promotional services related to how you interact with our Services:

- > Job Title/Function

- > Business Address

- > Topics of interest

- > Firmographic information (company size by employees or approximate revenue band)

- > Role in purchase decisions

Personal Information we automatically collect when you use our Services: Some Personal Information is automatically collected when you use our Services, such as the following:

- Computer name

- Hostname

- External IP

- OS type

- OS version

- Endpoint Scans collect additional data:

- > IP address (source and destination)

Website Usage Information We Collect. In addition to Personal Information that you choose to submit to us, whenever you visit or interact with our Services, we may collect or store information about your interaction with our Services ("Usage Information"). This Usage Information may include:

- your IP address or any other unique identifier assigned to the device that you use to access our Services;

- the functionality and characteristics of your device, including type of browser, operating system and hardware, mobile network information, and in some cases location information;

- the URL that referred you to our Services, if any;

- your activities on our Services, such as which webpages you visit, what terms you searched within our Services, and which links within our Services that you click on; and

- the time of day that you visited our Services and how long your visit lasted.

Usage Information is typically anonymous information; however, if it is combined with your Personal Information in a manner that reasonably allows it to be associated with your identity, or is otherwise considered Personal Information under applicable law, it will be treated as Personal Information under this Privacy Policy, and, if you are an EU resident, it may be considered Personal Data and be subject to the section applicable to EU users below.

Collection of Personal Information

We and our service providers collect Personal Information in a variety of ways, including:

- **Through the Services.**
- **From Other Sources.**
 - We receive your Personal Information from other sources, such as publicly available databases, social media platforms, and joint marketing partners.
 - If you connect your social media account to your Services account, you will share certain Personal Information from your social media account with us, including your name, email, photo, connections, and any other information that may be accessible to us.

If you disclose any Personal Information relating to other people to us or to our service providers in connection with the Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

Use of Personal Information

We and our service providers use Personal Information for the following purposes:

- **Providing the functionality of the Services and fulfilling your requests.**
 - To provide the Services' functionality to you, such as arranging access to your account, supporting your product and service needs and providing recommendations.
 - To complete your transactions and verify your information.
 - To provide you with customer service, respond to your inquiries, and fulfill your requests.
 - To send administrative information to you, such as changes to our terms, conditions, and policies.
 - To allow you to share information with other prospective customers.
- **Providing you with our marketing materials and facilitating social sharing.**
 - To send you marketing related emails and other information, such as literature on products and services, updates, new features, and new opportunities.

- **Analyzing Personal Information for business reporting and providing personalized services.**
 - To analyze or predict our users' preferences in order to prepare aggregated trend reports so we can improve our Services.
 - To better understand your interests and preferences, so we can personalize our interactions with you and provide you with information and/or offers tailored to your interests.
 - To better understand your preferences so we can deliver content we believe will be relevant and interesting to you.
- **Aggregating and/or anonymizing Personal Information.**
 - We may aggregate and/or anonymize Personal Information so that it will no longer be considered Personal Information. We do so to generate other data for our use, which we may use and disclose for any purpose, as it no longer identifies you or any other individual.
- **Accomplishing our business purposes.**
 - For data analysis, such as to improve the efficiency of our Services.
 - For processing transactions using our Services.
 - For communicating with you about updates, maintenance and other technical support matters concerning the Services and responding to inquiries.
 - For audits, to verify that our internal processes function as intended, and to address legal, regulatory, or contractual requirements.
 - For fraud prevention and security monitoring purposes, including to detect and prevent cyberattacks or attempts to commit identity theft.
 - For developing new products and services.
 - For enhancing, improving, repairing, maintaining, or modifying our current products and services, as well as undertaking quality and safety assurance measures.
 - For identifying usage trends, such as understanding which parts of our Services are of most interest to users.
 - For determining the effectiveness of our promotional campaigns, so we can adapt our campaigns to the needs and interests of our users.
 - For operating and expanding our business activities.

Disclosure of Personal Information

We disclose Personal Information:

- **To our third-party service providers, to facilitate services they provide to us.**
 These can include providers of such services as website hosting, data analysis, payment processing, order fulfillment, fraud prevention, information technology and related infrastructure provision, customer service, email delivery, and auditing. We may provide these Data Processors with access to your Personal Information in order for them to complete a requested transaction or otherwise perform

services for us or for you on our behalf. Prior to allowing our service providers to access your Personal Information, we will enter into a data protection agreement or addendum (“DPA”) with them to ensure that they handle and process the information in accordance with this Privacy Policy and applicable law as instructed by us.

- **To our Customers, to facilitate your interaction with the Services.**

We share your Personal Information with Flo Recruit customers, including employers and recruiters, to facilitate in their recruiting processes. All such sharing is subject to your first consenting to such disclosure. If you consent to the sharing of your Personal Information with our customers, it will be subject to our privacy policy and terms of use.

- **To our Partners, including the following:**

- Managed Service Partners:** Subject to your consent, we share your contact information with third parties that provide an offering or service that runs the Flo Recruit product for you. If that managed service provider is also a Flo Recruit reseller or distributor, you may purchase the Flo Recruit product directly through them.

- Implementation Partners:** we may share your contact information with partners who can help you with implementation and integration of Flo Recruit into your environment.

- Training Delivery Partners:** Subject to your consent, we may share your contact information with partners that we work with to deliver training for Flo Recruit products in certain locations, so that such partner can facilitate the delivery of the training directly to you.

- Applicant Tracking Partners:** Subject to your consent, we share your contact information with partners that provide applicant tracking systems to improve your user experience and improve the likelihood of matching applicants with employers.

Other Uses and Disclosures

We may also use and disclose Personal Information as we believe to be necessary or appropriate: (a) to comply with applicable law, to respond to requests from public and government authorities, to cooperate with law enforcement, and for other legal reasons; (b) to enforce our terms and conditions; and (c) to protect our rights, privacy, safety, or property, and/or that of you or others. We may use, disclose, or transfer Personal Information to a third party in connection with any proposed or actual reorganization, bankruptcy, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our assets or stock.

OTHER INFORMATION

“**Other Information**” is information that does not reveal your specific identity or directly relate to an identifiable individual. We and our service providers may collect and use Other Information in a variety of ways, including:

- **Your browser or device.**
 - Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Mac), screen resolution, operating system name and version, device manufacturer and model, language, and Internet browser type and version. We use this information to ensure that the Services function properly.
- **Your use of the Apps.**
 - When you download and use one of our Apps, we and our service providers may track and collect App usage data, such as the date and time the App on your device accesses our servers and what information and files have been downloaded to the App based on your device number.
- **Cookies, pixel tags, and similar technologies.**
 - We use cookies, pixel tags, and similar technologies. We may use such technologies to track the actions of our email recipients, measure the success of our marketing campaigns, and compile statistics about use of the Services and response rates.
 - We may use third-party advertising companies to serve ads regarding goods and services that may be of interest to you when you access and use the Services and other webServices or online services. You may receive ads based on information relating to your access to and use of the Services and other webServices or online services on any of your devices, as well as on information received from third parties. These companies place or recognize a unique cookie on your browser (including through the use of pixel tags). They also use these technologies, along with information they collect about your online use, to recognize you across the devices you use, such as a mobile phone and a laptop. If you would like more information about this practice, and to learn how to opt out of it in desktop and mobile browsers on the particular device on which you are accessing this Privacy Policy, please visit <http://optout.aboutads.info/#/> and <http://optout.networkadvertising.org/#/>, or by visiting www.youronlinechoices.eu if you live in Europe..

Uses and Disclosures of Other Information

We may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat Other Information as Personal Information under applicable law, we may use and disclose it for the purposes for which we use and disclose Personal Information, as detailed in this Privacy Policy. In some instances, we may combine Other Information with Personal Information. If we do, we will treat the combined information as Personal Information as long as it is combined.

SECURITY

We seek to use reasonable organizational, technical, and administrative measures to protect Personal Information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the “Contact Us” section below.

RETENTION PERIOD

We retain Personal Information for as long as needed or permitted to fulfill the purpose(s) for which it was obtained, including to satisfy any legal, compliance, accounting, or reporting requirements, and consistent with applicable law. The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you;
- Whether there is a legal obligation to which we are subject, such as to keep transaction records for a certain period of time; or
- Whether retention is advisable in light of our legal position, such as in regard to applicable statutes of limitations, litigation, or regulatory investigations.

THIRD-PARTY SERVICES

This Privacy Policy does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third party operating a website or service to which the Services link. The inclusion of a link on the Services does not imply our endorsement of the linked site or service. In addition, we are not responsible for the information collection, use, disclosure, or security policies or practices of other organizations, such as Facebook, Twitter, Instagram, YouTube, Pinterest, LinkedIn, Apple, Google, Microsoft, RIM, or any other social media platform, operating system provider, app provider, wireless service provider, or device manufacturer, including with respect to any Personal Information you disclose to other organizations through or in connection with our Apps or our Social Media Pages.

YOUR CHOICES

If you no longer want to receive marketing related emails from us on a going-forward basis, you may opt out by using the unsubscribe link provided at the bottom of each such email. If you opt out, we may still send you important administrative messages, from which you cannot opt out.

If you prefer that we discontinue sharing your Personal Information on a going-forward basis with third parties for their direct marketing purposes, you may opt out of the sharing by contacting us at privacy@florecruit.com.

You can update your Personal Information by contacting customer service at privacy@florecruit.com.

For residents of the following states: Please see “Additional Information for Residents of California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, New Hampshire, Nebraska, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, and Virginia,” below, for additional information about your rights.

USE OF THE SERVICES BY MINORS

The Services are not directed to individuals under the age of thirteen (13), and we do not knowingly collect Personal Information from such individuals.

JURISDICTION AND CROSS-BORDER TRANSFER

We are located in the United States. We may store and process your Personal Information in any country where we have facilities or in which we engage service providers. By using the Services, you understand that your information will be transferred to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country. Where required by law, we provide adequate protection for the transfer of personal information in accordance with applicable law, such as by obtaining your consent, relying on the European Commission’s adequacy decisions, or executing Standard Contractual Clauses. You may access a copy of these Standard Contractual Clauses via the link: https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj.

ADDITIONAL DISCLOSURES FOR INDIVIDUALS RESIDING IN EUROPE

If you reside in the European Economic Area, this section applies to you.

Legal Basis for Processing. When we process your personal information, we will do so in reliance on the following lawful bases:

- To perform our responsibilities under our contract with you (e.g., processing payments for and providing the services you have ordered).
- When we have a legitimate interest in processing your personal data to operate our business correctly and efficiently or protect our interests (e.g., to provide, maintain and improve our services, conduct data analytics, and communicate with you).
- When we find such processing is necessary to comply with a legal obligation to which we are subject (e.g., to maintain a record of those who have opted-out of marketing communications).
- When we have your consent to do so (e.g., when you agree to receive marketing communications from us). You may withdraw such consent at any time by emailing us at privacy@florecruit.com. Please note that withdrawing consent will not affect processing prior to such withdrawal, nor will it affect processing based on other lawful bases.

Your Privacy Rights. You have the right to (1) request to know more about and access your personal information, including in a portable format, (2) request deletion of your personal

information, (3) request correction of inaccurate personal information, (4) request restriction of processing of your personal information, and (5) object to the processing of your personal information for certain purposes. To exercise any of these rights, please us at privacy@florecruit.com. If you have a concern about our processing of personal information that we are not able to resolve, you have the right to lodge a complaint with the Data Protection Authority where you reside. Contact details for your Data Protection Authority can be found using the links below:

- For individuals in the EEA, click [here](#).
- For individuals in the UK, click [here](#).
- For individuals in Switzerland, click [here](#).

SENSITIVE INFORMATION

Unless we request it, we ask that you not send us, and you not disclose, any sensitive Personal Information (e.g., Social Security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, or criminal background) on or through the Services or otherwise to us.

THIRD-PARTY PAYMENT SERVICE

The Services may provide functionality allowing you to make payments using a third-party payment service with which you have created your own account. When you use such a service to make a payment to us, your Personal Information will be collected by such third party and not by us and will be subject to the third party's privacy policy, rather than this Privacy Policy. We have no control over, and are not responsible for, any such third party's collection, use, or disclosure of your Personal Information.

UPDATES TO THIS PRIVACY POLICY

The "UPDATED" or "LAST UPDATED" legend at the top of this Privacy Policy indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Policy on the Services.

CONTACT US

If you have any questions about this Privacy Policy, please contact us at privacy@florecruit.com or at

Flo Recruit, Inc.
Attention: CFO
623 W 38th Street Ste 340
Austin, TX, 78705
Telephone: 888-331-1949

Because email communications are not always secure, please do not include credit card or other sensitive information in your emails to us.

ADDITIONAL INFORMATION FOR RESIDENTS OF CALIFORNIA, COLORADO, CONNECTICUT, UTAH, AND VIRGINIA

This section supplements the above Privacy Policy and provides additional details regarding our collection, use, and disclosure of Personal Information relating to residents of California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, New Hampshire, Nebraska, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, and Virginia.

Collection, Disclosure, Sale, Sharing, and Processing of Personal Information

The following chart details which categories of Personal Information we collect, process, and disclose, including for purposes of targeted advertising.

Categories of Personal Information	Disclosed to Which Categories of Third Parties for Operational Business Purposes	Sold to Which Categories of Third Parties	Shared with Which Categories of Third Parties for Cross-Context Behavioral or Targeted Advertising	Processing Purposes (see "Use of Personal Information" above for a detailed description of each Processing Purpose)
Identifiers, Profile Data and Login Information Examples: Name Email address Telephone number	Our service providers	None	None	• Providing the functionality of our Services and fulfilling your requests • Providing you with our marketing materials and facilitating social sharing • Analyzing Personal Information for business reporting and providing personalized services • Aggregating and/or anonymizing Personal Information • Respond to customer support requests

				• To comply with law or defend out legal rights • Accomplish our business purposes
Personal information as defined in the California customer records law: Name Email address Address Telephone number Professional or employment information Education information	Our service providers	None	None	• Providing the functionality of our Services and fulfilling your requests • Providing you with our marketing materials and facilitating social sharing • Analyzing Personal Information for business reporting and providing personalized services • Aggregating and/or anonymizing Personal Information • Respond to customer support requests • To comply with law or defend out legal rights • Accomplish our business purposes
Internet network and device information and network activity information Examples: IP address; device ID; type of device/operating system/browser used to access	Our service providers Analytics vendors who assist us with product enhancements	None	None	• Providing the functionality of our Services and fulfilling your requests • Providing you with our marketing materials and facilitating social sharing • Analyzing Personal Information for business reporting and providing personalized services • Aggregating and/or anonymizing Personal Information

				• Respond to customer support requests • To comply with law or defend our legal rights • Accomplishing our business purposes
Inferences drawn from any of the Personal Information listed above to create a profile or summary about, for example, an individual's preferences and characteristics	Our service providers	None	None	• Providing the functionality of our Services and fulfilling your requests • Providing you with our marketing materials and facilitating social sharing • Analyzing Personal Information for business reporting and providing personalized services • Aggregating and/or anonymizing Personal Information • Accomplishing our business purposes

Individual Rights and Requests

Subject to applicable law, you may make the following requests:

1. You may request to know whether we process your Personal Information and to access such Personal Information.
 - a. If you are a California resident, you may request the following information:
 - i. The categories of Personal Information we collected about you and the categories of sources from which we collected such Personal Information;
 - ii. The business or commercial purpose for collecting, selling, or sharing Personal Information about you;
 - iii. The categories of Personal Information about you that we sold or shared and the categories of third parties to whom we sold or shared such Personal Information; and
 - iv. The categories of Personal Information about you that we otherwise disclosed and the categories of third parties to whom we disclosed such Personal Information.
2. You may request to correct inaccuracies in your Personal Information.
3. You may request to have your Personal Information deleted.

4. You may request to receive a copy of your Personal Information, including, where applicable, in a portable format.
5. You may request to opt out of the “sale” of your Personal Information.
6. You may request to opt out of targeted advertising, including the “sharing” of your Personal Information for purposes of cross-context behavioral advertising.

We will not unlawfully discriminate against you for exercising your rights under applicable privacy law. To make a privacy request, please contact us at privacy@florecruit.com stating your specific request. We will verify and respond to your request consistent with applicable law, taking into account the type and sensitivity of the Personal Information subject to the request. We may need to request additional Personal Information from you, such as name, email address, or phone number, in order to verify your identity and protect against fraudulent requests. If you make a request to delete, we may ask you to confirm your request before we delete your Personal Information.

To request to opt out of any future “sales” of your Personal Information and/or “sharing” of your Personal Information for purposes of cross-context behavioral advertising or any future processing for purposes of targeted advertising, please contact us at privacy@florecruit.com.

Appeal Process

If you are a resident of Colorado, Connecticut, or Virginia and we refuse to take action on your request, you may appeal our refusal within a reasonable period after you have received notice of the refusal. You may file an appeal by contacting us at privacy@florecruit.com.

Authorized Agents

If an agent would like to make a request on your behalf as permitted under applicable law, they may use the submission methods outlined above. As part of our verification process, we may request that the agent provide proof concerning their status as an authorized agent. In addition, we may require that you verify your identity as described above or confirm that you provided the agent permission to submit the request.

De-Identified Information

If we maintain or use de-identified information, we will continue to maintain and use it only in a de-identified fashion and will not attempt to re-identify the information.