Privacy Policy

(Last Updated June 3, 2026)

This Privacy Policy ("**Policy**") sets out how TalentNeuron, LLC (collectively, "**TalentNeuron**," "**we**," "**our**," or "**us**") collects and uses personal information, and your choices and rights regarding our use of your personal information. TalentNeuron respects your privacy and is committed to protecting it through our compliance with this policy.

Scope of Privacy Policy

This Policy applies when you:

1. create, activate, and use a TalentNeuron user account and/or license;
2. express an interest in or have signed up for our products, including newsletters, apps, extensions, webinars, and e-books;
3. register for, and attend a virtual webinar or in-person TalentNeuron meeting; or
4. visit our websites, including our public and/or client websites, or social media sites (collectively, the "**Websites**").

It does not apply to websites and mobile applications owned or operated by third parties and are not branded with TalentNeuron logos. Please review the privacy policies on those websites and applications directly to understand their privacy practices.

For purposes of this Policy, TalentNeuron is the controller (or business, as applicable) of personal information collected via our Websites and services. If you are a California resident, we provide additional information about how to exercise your data access rights under the California Consumer Privacy Act, as amended by the California Privacy Rights Act (collectively, the "**CCPA**") in the "Your California Privacy Rights" section below.

For purposes of this Policy, unless otherwise required by applicable law, "**personal information**" means any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household. "**Personal information**" does not include information that is considered publicly available, aggregated, or deidentified under applicable law.

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1. INFORMATION WE COLLECT

1.1 Sources from which we collect personal information

We may collect and process your personal information directly from you or from the following sources:

- **Communications via our Websites:** When you provide it to us through communications via our Websites, including through our contact information, when you register an account with us, and similar situations in which you have chosen to provide the information to us, including for customer services support. Any of our communications with you, including any phone calls, may be monitored and recorded for quality purposes.
- **Products or services you request:** Where you request a good or service from us, we will collect your personal information to process your request and otherwise contact you following a purchase.
- **Referrals or recommendations:** Referrals or recommendations, including from within the TalentNeuron group, from a third party, or from our send-to-colleague functionality, as described further below in Section 1.4;
- **Social media:** Social media sites and other external internet sites, such as Facebook, Twitter, or LinkedIn.
- **Public resources:** Resources such as telephone directories, newspapers, commercially available data resources, public registries, or public records.
- **Interaction with our Websites and use of our services:** When you use our Websites, we will automatically receive information using cookies and similar technology, including IP address, device identifiers, browser details, and information about usage of the Websites and related Internet activity (such as the site you came from, search engine(s) and keywords you used to find our Websites, the pages you view within our Websites, and access times). To offer you a consistent and personalized experience in your interactions with us, information collected through one service we provide may be combined with information obtained through other services. For example, we may use services from other companies that enable us to derive a general geographic location based on your IP address or other factors in order to customize certain services to your geographic area.

1.2 Categories of personal information collected

The categories of personal information we may collect and process (but only to the extent and in a manner consistent with applicable law) are as follows. Certain information may be uploaded or configured by clients through their use of the Services, including through configurable or custom fields, and the specific categories of information processed may therefore vary by client.

Category	Details
Personal identifiers and personal details	Name, email address, social media handles, address, billing address, zip or postal code, telephone number, unique personal identifier, online identifier, Internet Protocol (IP) address, account name, username, password, and identifiers you post to our Websites.
Demographic information	Age, date of birth, gender, and other similar data you provide as part of your profile or when using features of our services or Websites.
Commercial Information	Products or services purchased, obtained, or considered; purchasing or consuming histories or tendencies; transaction details, including product or service details, and the date and location of the purchase.
Payment Information	Billing information, such as account number, credit card number, expiration date, card verification number, and billing address for purchases.
Internet or Other Electronic Network Activity Information	IP address, device identifiers, type of browser and operating system, browsing and search history on our Websites, areas of our Websites visited, products or content viewed and clicked on, referral site information, interactions with digital ads, and embedded technologies in communications (e.g., web beacons, tags, and pixels) to track interactions such as email opens or content clicks.
Location Data	General location information derived from your IP address and zip code.
Audio and visual information	Audio recordings from customer service calls for quality assurance purposes.
Employment-related information	Work experience, previous employment, education history, resume, URLs to personal or professional websites, workplace skill sets, certifications, visa requirements, salary expectations, and voluntarily provided information (e.g., ethnicity, gender, disability status, veteran status).
Inferences	Analysis of purchases, preferences, or interactions to create a profile suggesting other products or services of interest.
Information About Others	Information you provide about others, used to fulfil your requests; no marketing communications are sent to your contacts unless they separately opt-in.

1.3 How we use your personal information

We process your personal information only as necessary to enable us to provide our products and services, to perform our contracts entered into between you and us, to support our business functions, to ensure compliance with applicable laws, and for the purposes of our legitimate business interests, including the following:

- To create, activate, and use a TalentNeuron user account and/or license;

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- To facilitate the business through communication with corporate clients and other business contacts, for example, to communicate about webinars;
- For internal analysis and research to help us improve our existing products and services, and create new products and services;
- To send marketing to business contacts regarding our services and products, which may be of interest and to promote our business and brand;
- To administer our Websites, investigate any complaints, and provide more customized customer service;
- To monitor social media content to manage relations with our clients and promote our business and brand;
- To personalize your experience of our Websites;
- To perform statistical and trend analysis to improve the user experience and performance of our Websites;
- To detect and prevent fraudulent and/or unlawful use of our Websites, products, and services.

Where we collect and use information for our legitimate interests as mentioned above, we will not unfairly place our legitimate interests above what is best for you. Legitimate interests are our business or commercial reasons for using your personal information, such as (i) keeping our records up to date; (ii) providing the services to you; (iii) maintaining or administering the services; (iv) performing business analyses or for other internal purposes to improve the quality of our business and the services we offer; (v) prevention of fraud and financial crime to protect the public; (vi) communicating with you concerning programs or services consistent with our obligations to provide those services or otherwise; and (vii) participating in litigation, investigations, regulatory or governmental inquiries or for other legal or regulatory purposes involving our customers who use or have used our services or other third parties. For more information regarding our legitimate interests as applied to your personal information, please contact us using one of the methods listed in Section 13 below.

Where you consent to our collection and use of your personal information (when required under applicable law), and we rely on your consent, you have the right to withdraw consent by contacting us using one of the methods listed in Section 13 below.

In certain circumstances, if you do not provide personal information which is required (for example, in relation to activating your TalentNeuron license), we will not be able to perform our contractual obligations or provide you with products and services. When this is the case, we will make it clear.

1.4 Additional information

Recorded Communications with TalentNeuron

We may ask to record calls for training, quality and research purposes. All recordings will be treated as confidential. If you do not want us to record your call, you will be given a chance to opt out. If your call is already in progress, you may ask us to turn off the recording at the start of the call.

Communication with Colleagues

You may use the send-to-colleague functionality on some of our Websites to send your colleagues information from TalentNeuron. In order to fulfill this request, we will ask you for your colleagues' names and email addresses. We do not retain this data after the email is sent. Please be aware that your name and email address may be included in the communication sent to your colleague.

2. WHEN WE DISCLOSE YOUR PERSONAL INFORMATION

TalentNeuron complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and 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. TalentNeuron 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 and the United Kingdom in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF. Talent Neuron 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/ .

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, TalentNeuron commits to resolve DPF Principles-related complaints about our collection and use of your personal information. EU and UK individuals and Swiss individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF should first contact TalentNeuron at:

Email: privacy@TalentNeuron.com
Mailing Address: TalentNeuron, ATTN: Privacy Team, 590 Madison Avenue, 40th Floor, New York, NY 10022

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, TalentNeuron commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) and the UK

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Information Commissioner's Office (ICO) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of human resources data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF in the context of the employment relationship.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, TalentNeuron commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner's Office (ICO) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF.

We may disclose your personal information to third parties as follows:

Third-Party Recipient	Purpose of Disclosure
TalentNeuron Group Companies	To process data for the purposes outlined in the Privacy Policy.
Consent-Based Recipients	When we have the individual's consent or authorization to share their personal information.
Service Providers (IT Systems)	To maintain or service business contact databases and IT systems (e.g., IT suppliers and technology vendors).
Professional Advisors	To provide necessary services, such as auditing and legal advice.
Public Authorities	To comply with applicable laws, protect rights, safety, and property, and respond to lawful requests (e.g., national security or law enforcement).
Mergers, Sales, or Corporate Changes	To facilitate transactions such as mergers, acquisitions, or asset transfers, including pre-transaction reviews.
Anonymized/Aggregated Data Recipients	Personal data may be shared in anonymized or aggregated form, as it is no longer considered personal information.

Talent Neuron may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We are committed to handling such requests in compliance with applicable laws and regulations to ensure the protection of your personal data.

The Federal Trade Commission has jurisdiction over TalentNeuron's compliance with the EU-U.S. DPF, the UK Extension to the EU- U.S. DPF and the Swiss-U.S. Data Privacy Framework. In certain situations, TalentNeuron may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Under certain conditions, individuals may invoke binding arbitration to resolve disputes regarding Talent Neuron's compliance with the Data Privacy Framework (DPF) Principles. Talent Neuron is committed to arbitrating claims in accordance with Annex I of the DPF Principles, provided that the individual has delivered notice to TalentNeuron and followed the conditions set forth in Annex I of Principles.

Talent Neuron is committed to protecting personal information in accordance with the Data Privacy Framework (DPF) Principles. In cases where Talent Neuron transfers personal information to a third party, Talent Neuron remains responsible under the DPF Principles if the third party processes such information in a manner inconsistent with the DPF Principles, unless Talent Neuron can demonstrate that it is not responsible for the event giving rise to the damage.

Utilization Information

We may share information with our organizational clients about how their employees use the Websites and the resources available to them through the Websites (e.g., how employees used certain features of the Websites, utilization trends, which features were most popular with the client's employees).

3. CHOICES ABOUT YOUR INFORMATION

Talent Neuron respects your rights to limit the use and disclosure of your personal data. In accordance with the **Data Privacy Framework (DPF) Principles**, we offer the following options:

3.1 Opt-Out Choices

You have the right to choose (opt out) whether your personal information is:

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- **Disclosed to third parties** for purposes other than those described in this policy or for materially different purposes from those for which it was originally collected or subsequently authorized by you.
- **Used for purposes** materially different from those for which it was originally collected or subsequently authorized by you.

To exercise your opt-out rights, you may contact us via:

- Email: privacy@TalentNeuron.com
- Writing to us at the address below

3.2 Opt-In Requirements for Sensitive Information

For sensitive personal information, Talent Neuron requires your **affirmative express consent (opt-in)** before:

- Disclosing such information to third parties.
- Using such information for purposes other than those originally collected or authorized by you.

If you have any questions or need assistance with managing your sensitive information, please contact us at privacy@TalentNeuron.com.

3.3 Third-Party Agents

Disclosure of personal data to third parties acting as agents on Talent Neuron's behalf does not require an opt-out mechanism. These agents are bound by contractual agreements to process personal information only under our instructions and in compliance with applicable privacy laws and the DPF Principles.

3.4 Clear and Conspicuous Mechanisms

Talent Neuron provides clear, conspicuous, and readily available mechanisms to exercise your choices regarding the use and disclosure of your personal data. You may update your preferences at any time by contacting us via:

- **Email**: privacy@TalentNeuron.com
- **Mailing Address**: Talent Neuron, ATTN: Privacy Team, 590 Madison Avenue, 40th Floor, New York, NY

Marketing Communications

We will respect your wishes not to receive marketing communications. You can change your marketing preferences by contacting us using one of the methods listed in Section 12 below. If you gave us your email address to receive marketing communications, you can opt out at any time by using the unsubscribe links or instructions included at the bottom of our emails. Please note that we will continue to send you service-related communications regardless of any opt-out request. We will not sell or share your information with third parties for their own promotional or marketing purposes unless you give us consent to do so or where permitted by applicable law.

4. SECURITY

We have implemented administrative, technical, and physical security measures to help prevent unauthorized access. We adhere to recognized security standards such as SOC 2 and ISO 27001 to ensure the confidentiality, integrity, and availability of personal information. Our measures include data encryption, pseudonymization, access controls, and regular security assessments to safeguard information and detect potential vulnerabilities. Despite these measures, no data transmission over the Internet can be entirely secure, and we cannot guarantee or warrant the security of any information you transmit via our Websites or apps. Please note that you are responsible for maintaining the security of your credentials used to access any TalentNeuron service or account, and you must report suspected unauthorized activity to us.

We make reasonable efforts to restrict access to information to only those employees, contractors, and agents who need such access in order to operate, develop, improve, or deliver our programs, products, and services.

5. RETENTION PERIODS

We will retain your personal information for as long as required to perform the purposes for which the data was collected, depending on the legal basis for which that data was obtained, and/or whether additional legal/regulatory obligations require us to retain it.

In general terms, this will mean that your personal information will be kept for the duration of our relationship with you and:

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- the period required by tax and company laws and regulations; and
- as long as it is necessary for you to be able to bring a claim against us and for us to be able to defend ourselves against any legal claims. This will generally be the length of the relationship plus the length of any applicable statutory limitation period under local laws.

6. COOKIES AND SIMILAR TECHNOLOGIES

TalentNeuron Websites use cookies and similar technologies (together referred to as "**cookies**," unless otherwise states) to provide you with an efficient experience in using our Websites. A cookie is a small text file which includes a unique identifier that is sent by a web server to the browser on your computer, mobile phone or any other internet enabled device when you visit an online site. One of the primary purposes of cookies is to store your preferences and other information on your computer in order to save you time by eliminating the need to repeatedly enter the same information and to display your personalized content and appropriate advertising on your later visits to these sites.

We use cookies for a variety of purposes and to enhance your online experience, for example, to identify your device, distinguish you from other visitors, record your IP address and understand your use of our Websites to determine the usefulness of our Website information, and to see how effective our navigational structure is in helping you reach that information. We also use cookies to identify the name of the website from which you linked to the Website of our brand. We do not otherwise track any information about your use of other websites.

Note that you may encounter cookies from our third-party providers that we have allowed on our Website that assist us with various aspects of our site operations and services.

Some of our website pages may contain electronic images known as web beacons (also known as clear gifs, tags or pixels) that allow us to count users who have visited our pages. Web beacons collect only limited information, e.g. a cookie number, time and date of a page view, and a description of the page on which the web beacon resides. We may also carry web beacons placed by third party advertisers. These beacons do not carry any information that could directly identify you.

6.1 Types and Categories of Cookies We Use

We use various types of cookies, including session and persistent cookies and similar technologies, local shared objects, pixels, and gifs, and we permit some third-party cookies. Persistent cookies remain on your computer until you delete them, while session cookies are based on your browsing session and are deleted once you close your browser. First party cookies are used and controlled by us to provide services on our Websites, while third-party cookies are placed by our service providers and/or trusted third parties.

Our use of cookies falls into four categories:

1. **Strictly necessary cookies**: these are essential in order to enable you to move around the Website and use its features. Without these cookies, the services you have asked for cannot be provided.
2. **Performance cookies:** also known as "analytical" cookies. These cookies allow us to recognize and count the number of visitors and to see how visitors move around and use the Website. For example, they allow us to understand which pages are visited most often, and if visitors get error messages from web pages. All information collected by these cookies is aggregated and therefore anonymous.
3. **Functionality cookies**: these cookies are necessary for the Website to operate and allow us to remember what choices you make and provide enhanced, more personal features. The information these cookies collect is typically anonymized and is not used to track your browsing activity on other websites.
4. **Advertising and marketing cookies:** these cookies are used to send you advertising and marketing-related material tailored to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaigns. They are usually placed by advertising networks with the website operator's permission. The third parties that provide these cookies may collect and combine information about your online activities over time, on other devices, and on other websites or online services, if those websites and online services also use the same advertising partners. Thus, although we do not track your website usage activity across non-affiliated websites over time, some third-party cookie providers may do so when you use the Websites.

We may change our use of cookies over time, but our use of cookies will generally fall into the above categories. More detailed information on how we use cookies and other web technologies can be found.

6.2 Opting out of cookies

You have the ability to accept or decline most cookies. You can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, however you may not be able to sign in or use interactive or other features of our Website and related services that depend on cookies. Note that, if you accept cookies, you have the ability to later delete cookies that you have accepted. If you choose to delete cookies, any settings and preferences controlled by those cookies will be deleted and may need to be recreated. If your browser settings are set up as 'Do Not Track', the use of cookies and tracking technologies will not apply to you.

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For more information on cookies and how they can be managed and deleted, please visit http://www.allaboutcookies.org/, http://www.networkadvertising.org/choices/, or http://www.aboutads.info/choices/.

7. GLOBAL PRIVACY CONTROL SIGNALS

We receive and process Global Privacy Control Signals ("**GPC Signals**") for requests to opt-out of sale or sharing. We process the commonly used and industry standard GPC Signals but because this is new technology and new providers may offer solutions, we will do our best to recognize, process, and honor a GPC Signal that meets the legal standards and is widely adopted in the industry.

8. CHILDREN

Our Websites are for individuals who are at least 18 years old. Our online services are not designed to be used by individuals under the age of 18. TalentNeuron does not knowingly collect personal information from individuals under the age of 18. If we discover that we have inadvertently collected personal information from anyone younger than the age of 18, we will delete that information. We do not sell personal information for valuable consideration or share the personal information for behavioral or targeted advertising of any individual we know to be under the age of 18. TalentNeuron takes reasonable steps to verify the age of users during the account creation process and implements parental consent mechanisms where applicable to ensure compliance with relevant laws and regulations.

9. YOUR DATA SUBJECT RIGHTS

In certain circumstances and jurisdictions, you have certain rights regarding your personal information. **You have the right to access** your **personal data.** For example, you may have the right to review, correct, and delete personal information we have about you, or to consent or withdraw consent to certain uses or sharing of personal information. A summary of each right and how you can exercise it is set out below. To opt out of receiving commercial communications, please send an email to privacy@TalentNeuron.com. You may be able to use the Website to access and update the information that you have provided to us through your use of the Website or otherwise.

When you make a request, we may require that you provide information and follow procedures so that we can verify a request you make and your jurisdiction before responding to it. The verification steps we take may differ depending on your jurisdiction and the request you make. We will match the information that you provide in your request to information we already have on file to verify your identity. If we are able to verify your request, we will process it. If we cannot verify your request, we may ask you for additional information to help us verify your request.

Where we receive your request to exercise one of these rights, we will respond without undue delay and within the time required by applicable law. This may be extended in certain circumstances, e.g., where requests are complex or numerous.

We will provide the information free of charge, except where requests are manifestly unfounded or excessive, e.g. because of their repetitive character. In these circumstances we may charge a reasonable fee or may refuse to act on the request. We will advise you of any fees prior to proceeding with a request. We may ask for additional information to verify your identity before carrying out a request.

9.1 EU Privacy Rights

If you are a European Union resident, in accordance with TalentNeuron's policies and procedures, you have the right to review, verify, correct, and request erasure of the personal information that we hold about you under certain circumstances. You also have the right to limit, restrict, or object to the processing of your personal information under certain circumstances. You may also have the right to request that we transfer your personal information to another party to the extent provided for under applicable data privacy laws. For more information on your rights, please see https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens_en.

If you want to review, verify, correct, or request erasure of your Personal Information; limit, restrict, or object to the processing of your Personal Information; or request a transfer of your Personal Information to another party, please contact us at privacy@TalentNeuron.com or write to us at

TalentNeuron
ATTN: Privacy Team
590 Madison Avenue,
40th Floor New York,
NY 10022

To protect your privacy and security, we also will take reasonable steps to verify your identity before granting access, making corrections, or following such a request to correct or delete your data.

When you contact us, we will respond as soon as possible and where possible within one month. If your request is more complicated, it may take longer to respond to you, but we will respond within three months of your request.

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9.2 Your California Privacy Rights

California law requires us to provide California residents with additional information regarding how we collect, use, and share your personal information ("**California Privacy Notice**"). Persons with disabilities may obtain this notice in alternative format upon request by contacting us at privacy@TalentNeuron.com or calling +1-888-598-9905.

California Shine the Light. Although we do not currently share your information for other companies' direct marketing purposes, residents of California have the right to request information from us regarding other companies to whom we have disclosed certain categories of information during the preceding year for the other companies' direct marketing purposes. If you are a California resident and would like to make such a request, please email privacy@TalentNeuron.com or write to us at:

TalentNeuron
ATTN: Privacy Team
590 Madison Avenue,
40th Floor New York,
NY 10022

Categories of personal information sold to or shared with third parties. We do not sell and have not sold your personal information or transferred personal information to third parties to use for their benefit in the past twelve (12) months. We do share and have shared certain personal information for targeted or cross-context behavioral advertising in the past twelve (12) months. However, we do not sell or share the personal information of minors under 16 years of age.

For purposes of this Policy, "**sell**" means the sale or transfer of your personal information to a third party for monetary or other valuable consideration, subject to certain exceptions in applicable law. For purposes of this Policy, "**share**" means transferring, making available or otherwise disclosing your personal information to another party for purposes of sending advertising to you based on your personal information obtained from your activities across distinctly-branded sites. "**Share**" and "**sharing**" as used in this section, does not include transfers of personal information described in this Policy as part of a corporate business transaction, such as a merger, acquisition, or joint venture, or in the event of insolvency, bankruptcy, or receivership. Should such an event occur, we will use reasonable efforts to direct the transferee to use personal information you have provided to us in a manner that is consistent with this Policy.

In the past twelve (12) months, we have shared the following categories of personal information with data analytics providers, operating systems and platforms, social networks, and cookie providers for the purposes described in Section 1.3 above:

- Personal identifiers and personal details
- Internet or Other Electronic Network Activity Information
- Geolocation Data
- Inferences

Please see Section 6 on "Cookies and Similar Technologies" above for information about the collection and use of personal information by third parties who process information collected by cookies and similar technologies that we permit them to use on the Websites.

Categories of personal information disclosed to service providers. We disclose personal information to certain third parties to enable them to fulfil the purposes described in Section 1.3 above. The personal information provided to our service providers is limited to that personal information which is necessary for them to fulfil these purposes. Our service providers have contractually agreed not to use your personal information other than as necessary to fulfil the applicable purposes and in accordance with California law. Additionally, service providers must implement robust technical and organizational measures, comply with all applicable data protection regulations and fulfil their responsibilities to ensure data security, privacy, and effective incident management. In the preceding twelve (12) months, we have disclosed the categories of personal information described in Section 1.2 above, with the following categories of service providers:

- Data Analytics Providers
- Operating Systems and Platforms
- Customer Support Providers
- Social Networks
- Workforce Management and Human Resource Management Providers
- Government Entities

We disclose personal information to our service providers in accordance with the purposes described in Section 1.3 above.

Individual Rights. California law may provide you with the following privacy rights:

1. *Right to Know and to Access.* Subject to certain exceptions, and legal obligations, you have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months, including whether we sell or share such information. You also have the right to request access to personal information collected about you and information regarding the following:

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- The categories of personal information we collected about you;
- The categories of sources of that information;
- The business or commercial purposes for which we collect, sell or share personal information about you;
- The categories of personal information about you that we have disclosed about you and the categories of persons or vendors to whom it was disclosed for a business purpose; and
- The specific pieces of personal information we have collected about you.

This information is disclosed in Section 1 above. You may also submit a request for this information as described below. To protect your personal information, we may request additional information to verify your identify before we act on your request. To the extent legally required, we will provide a copy of the personal information we have collected about you, in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance. We may provide this data to you via email to the email address you have provided with your request.

2. *Right to Correction.* You have the right to request that we correct any inaccurate personal information we maintain about you. In response to your request, we may request additional information showing that the information you want to correct is inaccurate.
3. *Right to Deletion.* You may request that we delete your personal information. This right is subject to certain exceptions, and legal obligations imposed by state or federal privacy and employment laws. We will delete or deidentify personal information not subject to one of these exceptions from our records and will direct our service providers to take similar action.
4. *Right to Opt-Out of the Sale or Sharing of Personal Information to Third Parties.* You have the right to opt out of the sale or sharing of your personal information by TalentNeuron to third parties.
5. *Right to Limit Use and Disclosure of Sensitive Personal Information.* You have the right to direct us to limit our use of your sensitive personal information to that use which is necessary to fulfill the purposes reasonably expected by an average consumer who requests those goods or services. California law considers the following pieces of personal information to be "sensitive:" social security number, driver's license number or other government-issued identification number, financial account number, any health insurance or medical identification number, an account password, security questions and answers, or unique biometric data. We do not knowingly collect or use sensitive personal information for any purposes, including to infer characteristics about you.
6. *Non-Discrimination or Retaliation.* We will not discriminate or retaliate against you for exercising any of your data privacy rights.

How to submit a request. You or an authorized agent may submit a request to exercise your rights through one of the following means:

1. By filling out a Consumer Data Request Form available .
2. By calling us toll-free at +1-888-598-9905
3. By emailing us at privacy@TalentNeuron.com.

California Online Privacy Protection Act Notice Concerning Do Not Track Signals. Do Not Track ("**DNT**") is a privacy preference that users can set in certain web browsers. We do not recognize or respond to browser-related DNT signals, as the industry is currently working toward a common approach to responding to DNT. To learn more about Do Not Track, please visit: www.allaboutdnt.org.

9.3 Nevada Residents

Nevada law requires us to provide certain Nevada consumers the ability to opt out of the "sale" of "personally identifiable information" as such terms are defined under Nevada law. We do not engage in such activity; however, if you are a Nevada resident who has purchased goods or services from us, you may submit a request to opt out of any potential future sales under Nevada law by emailing privacy@TalentNeuron.com. Once verified, we will maintain your request in the event our practices change.

10. INTERNATIONAL TRANSFERS

TalentNeuron is a global company and we may transfer personal information to other TalentNeuron group companies or suppliers outside your country. TalentNeuron will take reasonable steps to ensure that personal information is protected and any such transfers comply with applicable law.

TalentNeuron may transfer and maintain the personal information of individuals covered by this Policy on servers or databases outside the European Economic Area ("**EEA**"). Some of these countries may not have the equivalent level of protection under their data protection laws as in the EEA. For transatlantic data transfers, TalentNeuron relies on safeguards such as Standard Contractual Clauses (SCCs) or other mechanisms recognized under applicable data protection laws to ensure the lawful and secure transfer of personal information.

The countries to which we transfer data outside of the EEA may include any of the countries in which TalentNeuron does business.

All TalentNeuron entities have the same technical, physical, and administrative security controls and are required to comply with our data protection policies and procedures, applicable laws, and the terms of our client and member contracts governing the collection and use of information.

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11. LINKS TO EXTERNAL WEBSITES

TalentNeuron's services and technologies, including its Websites, may contain links to other websites or resources that are not part of the products, programs, or services run by TalentNeuron. We do not control these websites or their privacy practices, and any information you provide to these sites is subject to the privacy policies of those sites and are not covered by this Policy. We encourage you to read the privacy policies of those other websites.

12. CONTACT US

If you'd like more information about our privacy practices, feel free to contact us by calling us at +1-888-598-9905, emailing us at privacy@TalentNeuron.com, or by writing to us:

TalentNeuron
ATTN: Privacy Team
590 Madison Avenue,
40th Floor New York,
NY 10022

13. CHANGES TO THIS POLICY

From time to time, we may change and/or update this Policy. If this Policy changes in any way, we will post an updated version on this Website. We recommend you regularly review this Website to ensure that you are always aware of our information practices and any changes to such. Any changes to this Policy will go into effect on posting to this page. If you use our Website after any changes are effective, you are agreeing to comply with and be bound by them. To enhance transparency, we will notify users of any crucial or material changes to this Policy through a banner displayed on the Website.

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