



## Privacy and Cookie Policy

*Effective May 25, 2018*  
*Revised October 10, 2019*

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This Privacy and Cookie Policy (the "Policy") becomes effective on **May 25, 2018**, for all users, provided that enhanced data protection rights in this Policy required by the EU General Data Protection Regulation (including, without limitation, the "EEA Resident Rights" described in the "Other Important Privacy Information" section) become effective on **May 25, 2018**, for all EU-resident users who are natural persons.

We, Effective Edge Worldwide, LLC, a Colorado corporation, doing business as Interaworks, as the data controller ("EEW," "we," or "us"), explain in this Policy how we collect, process and/or use information that we receive via our websites and emails we send that link to this Policy, as amended from time to time. This Policy describes how EEW collects, processes, uses, shares and secures the personal information you provide. It also describes your choices regarding use, access, and correction of your personal information. For purposes of this Policy, personal information shall mean any information relating to an identified or identifiable natural person.

This Policy applies only to information we collect, process and use through the Platform. This Policy does not apply to information that we collect through other channels, such as information that we collect offline, from other websites or from emails you send us.

### Information We Collect

We collect information about you to provide our services. In order for us to best provide our services to you (and to help make it feasible for us to do so), it is essential that we are able to collect and use the information as described in this Policy. This means that the data collection is largely necessary for fulfilling the relationship we have with you, and where that is not the case, we have a legitimate interest in collecting the information described below.

### Information You Give Us

When you fill out registration forms, contact forms, submit your resume, or provide us with other personal information actively, we collect that information for processing and use in accordance with this Policy. Because we change our offerings and features from time to time, the options you have to provide us with personal information also may change, but

here are some examples of situations in which you will have the opportunity to provide personal information to us:

- Accessing Alumni resources;
- Signing up for email alerts;
- Completing a form related to one of our products or services;
- Completing a form requesting additional information;
- Contacting us for technical support or customer service.

Depending on how you interact with our Platforms, the personal information we collect from you may vary. For example, to access alumni resources we may only ask for an email address. In other circumstances, such as when you complete a form related to a particular service offering, we may ask you to provide other information, which may include your name, phone number, email address, company, and/or postal address. We also store information about your activity on our Platforms.

If you enter credit card information on the Platform in connection with a purchase, that information is sent directly from your browser to the third-party service provider we use to manage credit card processing and we do not store it on our servers. The service provider is not permitted to use the information you provide except for the sole purpose of credit card processing on our behalf.

### Information We Collect Automatically

When you use our Platforms, your device is automatically providing information to us so we can respond and customize our response to you. The type of information we collect by automated means generally includes technical information about your computer, such as your IP address or other device identifier, the type of device you use, and operating system version. The information we collect also may include usage information and statistics about your interaction with our Platforms. That information may include the URLs of our web pages that you visited, URLs of referring and exiting pages, page views, time spent on a page, number of clicks, platform type, location data (if you have enabled access to your location on your mobile device), and other information about how you used the Platform.

*Automated means of data collection include the following:*

**Cookies and Tracking Technologies.** Technologies such as: cookies, web beacons, locally shared objects (sometimes called "flash cookies"), mobile identifiers and similar

technologies ("Cookies") are used by EEW and our partners (such as advertising, marketing and analytics providers) ("Ad Partners"). We use Cookies to remember users' settings as well as for authentication and analytics. These technologies may be used in analyzing trends, administering our Platforms, tracking users' movements around the Platforms and to gather demographic information about our user base as a whole. You can control the use of Cookies at the individual browser level, but if you choose to disable Cookies, it may limit your use of certain features or functions on our website or service.

## How We Use Information

We use the information we collect to provide our services. In order for us to best provide our services (and to help make it feasible for us to do so), it is essential that we are able to collect and use the information as described in this Policy. So it is largely necessary for fulfilling the relationship we have with you, and, where that is not the case, we have a legitimate interest in using the information we collect, including personal information, for these purposes:

- to customize and improve the features, performance, and support of our sites;
- for internal operations, including troubleshooting, data analysis, testing, research, and service improvement (this includes use of your IP address and mobile device information to help diagnose problems with our service and to administer the Platform);
- to communicate with you or initiate communication with you on behalf of third parties through email, telephone (including mobile phone), or postal mail, including through the use of contact information that you provide to us or (where it is lawful for us to do so) that we otherwise obtain from third-party resources;
- to analyze use of the Platform and improve the Platform;
- to create aggregate and statistical data that does not identify you individually and that we can commercialize (for example, we use mobile device data and IP addresses to gather demographic information).

When we collect any information that does not identify you as a specific natural person ("Non-Personal Information"), we are permitted to use and disclose this information for any purpose, notwithstanding anything to the contrary in this Policy, except where we are required to do otherwise by applicable law. Examples of Non-Personal Information include: physical location information; demographic information, including gender, dates of birth, ZIP codes, etc.; or any personal information that has been anonymized, aggregated or de-identified. If we combine any Non-Personal Information with your personal information (such

as combining your ZIP code with your name), we will use and disclose such combined information as personal information in accordance with this policy. Similarly, if applicable law requires that we treat certain Non-Personal Information as personal information, we will use and disclose this information as personal information in accordance with this policy.

## How We Share Information

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

- We use affiliated and unaffiliated service providers all over the world (including web servers, cloud storage systems, CRM providers, email services, content support teams, marketing partners, and others) to help us deliver our service and run our business subject to strict confidentiality agreements. These companies are authorized to use your personal information only as necessary to provide these services to us;
- We will disclose data if we believe in good faith such disclosure is necessary (1) to comply with relevant laws or to respond to subpoenas or warrants or legal process served on us (though we reserve the right to take action on behalf of our users to defend their right to anonymity when we believe there is a legitimate basis to do so, because candid, lawful, anonymous free speech is fundamental to EEW's mission of workplace transparency); (2) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity; (3) as we otherwise deem necessary and is permitted by applicable laws to protect and defend the rights or property of us, the users of our services, or third parties; or (4) as permitted under applicable laws to meet national security and similar requirements;
- In reorganization or sale of our company or assets, your data may be transferred, subject to the acquirer and its affiliates accepting the commitments made in this Policy and compliance with applicable law;
- We will otherwise share personal information with your consent.

## Cookie Policy and Ad Choices

This Cookie Policy describes how Effective Edge Worldwide, LLC. ("we", "our", "us") uses Cookies and similar technologies.

## Cookies

Cookies are small pieces of data that are stored on your computer, mobile phone, or other device when you first visit a page. We use cookies, web beacons, locally shared objects (sometimes called "flash cookies"), mobile identifiers and similar technologies ("Cookies") to help us recognize you on the Platform, enhance your user experience, understand usage of the Platform, and show you relevant advertising. Cookies may also be set by other websites or services that run content on the page you're visiting.

### What types of Cookies do we use?

We use two types of Cookies on the Platform: "session cookies" and "persistent cookies." Session Cookies are temporary Cookies that remain on your device until you leave the Platform. A persistent Cookie remains on your device for much longer until you manually delete it (how long the Cookie remains will depend on the duration or "lifetime" of the specific Cookie and your browser settings).

We use Cookies for things like:

#### **Authentication**

We use Cookies to help us determine whether or not you've signed in to the Platform and to keep you signed in during visits as you access different pages.

#### **Security**

We use Cookies to enable and support security features, prevent fraud, and protect your data from unauthorized access.

#### **Preferences and Features**

We use Cookies to enable features, help us provide you with personalized content such as showing you your recent search activity.

#### **Analytics and Performance**

We use Cookies to analyze how our visitors use the Platform and to monitor site performance. These Cookies help us to identify and fix errors, understand and improve services, research and test out different features, and monitor how our visitors reach our sites.

## How We Work with Third-Party Ad Partners

When we work with our Ad Partners to serve you personalized, interest-based advertising, we do not share information with them that they can use to identify you or associate with you as a specific individual unless you have instructed us to do so (such as when you fill out a lead form in an ad, or approve your Profile for display to employers). Similarly, if one of these Ad Partners have information about you saved in one of their own Cookies on your browser, they use that information to help us send you a relevant ad, but they do not share with us information that we can associate with you as an individual.

We work with third parties, such as Google Analytics, to provide analytics services that use the Cookies set on your device to measure the performance of advertising and track traffic to EEW generally.

## Other Important Privacy Information

### EEA Resident Rights

If you are a resident of the European Economic Area, you have the following data protection rights:

- If you wish to access, correct, update or request deletion of your personal information, you can do so at any time by contacting us using the contact details provided under the [“How to contact us”](#).
- In addition, you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the [“How to contact us”](#).
- You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing emails we send you. Registered users can manage their account settings and email marketing preferences as described in the "Choices Regarding Your Personal Information" section below. If you are an unregistered user, or to opt-out of other forms of marketing (such as postal marketing or telemarketing), you may contact us using the contact details provided under the [“How to contact us”](#).
- Similarly, if we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor

will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

- You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. Notwithstanding the foregoing, we reserve the right to keep any information in our archives that we deem necessary to comply with our legal obligations, resolve disputes and enforce our agreements.

### Choices Regarding Your Personal Information

We will send you notifications and if, and to the extent, you have opted-in to promotional communications, or other messages using the contact information (e.g., your email address, your mobile device identifier) you provided to us when you registered or when you requested information from us. You may opt-out of continuing to receive optional messages by following the instructions included in each message.

We will send you service-related announcements when we believe it is necessary to do so. Generally, you cannot opt-out of these announcements, which are not primarily promotional in nature. If you do not wish to receive these announcements, you have the option to deactivate your account.

### How Long We Keep Your Personal Information

We keep your personal information only so long as we need it to provide the Platform to you and fulfill the purposes described in this Policy. This is also the case for anyone that we share your personal information with and who carries out services on our behalf. Retention periods can vary significantly based on the type of information and how it is used. Our retention periods are based on criteria that include legally mandated retention periods, pending or potential litigation, our intellectual property or ownership rights, contract requirements, operational directives or needs, and historical archiving. When we no longer need to use your personal information and there is no need for us to keep it to comply with our legal or regulatory obligations, resolve disputes and enforce our agreements, we'll either remove it from our systems or depersonalize it so that we can't identify you.

## Security Safeguards

**Security.** We employ physical, electronic, and managerial measures to safeguard the information we collect online. However, no company can fully eliminate security risks, so we cannot make guarantees about any part of our services.

## Privacy of Minors

To access or use the Platform you must be 13 years of age or older and, if under 18 or the age of majority in your jurisdiction, your use of Platform must be under the supervision of a parent or guardian or other responsible adult. If you become aware that a child has provided us with personal information without parental consent, please contact us [here](#). If we become aware that a child under 13 has provided us with personal information without parental consent, we remove such information and terminate the child's account.

## Updates to Our Privacy Policy

We may revise this Policy from time to time by posting an updated version on the Platform. This version of the Policy will be effective for you as described at the beginning of the Policy. Further revisions of this Policy will become effective as follows: The revised Policy will be effective immediately for unregistered users and users registering accounts or otherwise acknowledging the Policy on or after the revision date. For other users who registered accounts before the revision date, it will also become effective immediately. However they can object to the new Policy within thirty (30) days after the revision date. If we make a change that we believe materially reduces your rights or increases your responsibilities, we will notify you by email (sent to the email address specified in your account) or by means of a notice on this website prior to the change becoming effective. We may provide notice of changes in other circumstances as well. We encourage you to periodically review this page for the latest information on our privacy practices. Your continued use of the Platform is subject to the most current effective version of this Policy.

## Contact Us

If you have any questions or suggestions regarding this Policy, please contact us [here](#).

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