

## Comeet Privacy Policy

Comeet Technologies Inc. ("**Comeet**" or "**us**", "**our**", "**we**") provides a solution for the management of the information and interviewing of candidates for employment (the "**Solution**"). Comeet respects your right to privacy. This Privacy Policy explains how Comeet uses any data and information is provided to Comeet through the Solution and while visiting our site located at [app.comeet.co](http://app.comeet.co) (the "**Site**"). "**You**" includes both organizations which have subscribed for use of the Solution ("**Customers**") and individual end users of the Solution, such as candidates for employment or potential employees ("**Users**"). Comeet will not make Users' information available to third parties without your consent, subject to the terms and conditions of this Privacy Policy. If not otherwise defined herein, capitalized terms have the meaning given to them in the Comeet Terms of Use, which are available [here](#) (the "**Terms**").

We provide our Solution as a service to our Customers. These Customers are solely responsible for ensuring that their use of the Solution complies with applicable laws and does not violate third party rights.

### Information We Collect

Any Customer, including any potential employer, recruiter or manpower agency, that uses the Solution to collect, use or store data of potential employees will input Identifying Information of such potential employee in the Solution. "**Identifying Information**" means information that can be directly associated with a specific individual or entity such as but not limited to:

- a name, address, telephone number, e-mail address,
- or information about activities directly linked to an individual, such as the employment or educational history of a specific individual,
- any observations that a Customer may make in respect of a potential employee, including during an interview, or
- any hiring decisions made by such Customer.
- Users may also input their Identifying Information in order to apply for employment for our Customers by means of our Solution on such Customer's websites or on our Site.
- In addition, Customers that register to use our Solution will be required to provide us with certain Identifying Information.
- If a User signs up to receive emails or updates about our services, such Users will provide their name and e-mail address
- Comeet may also receive the internet addresses of Customers of Users.
- Comeet also collects any Identifying Information contained in any message that you may send to Comeet.

It is such your voluntary decision whether to provide us with any such Identifying Information (and you are not legally required to provide this Identifying Information), but if you refuse to provide such information you will not be able to apply for employment by means of our Solution and/or register for use of the Solution.

- Customers may also input collect certain publicly available Identifying Information regarding potential candidates whose information is publicly available (the "**Prospects**"). This information may include the Prospect's name, address, telephone number, e-mail address, employment or educational history and any other publicly available information.
- In addition, the Solution may gather information regarding the system and browsing activity of Customers and Users that access the Solution or visit the Site,

such as the operating system, browser and IP address of such Customers and Users or how a Customers or User interacted with the Solution.

### **How we Protect Information**

We follow generally accepted industry standards to protect the Identifying Information submitted to us, both during transmission and once we receive it. However, no method of transmission over the Internet or method of electronic storage is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your Identifying Information, we cannot guarantee its absolute security.

Only authorized employees of Comeet have access to our production infrastructure, and passwords Customers provide us are strictly regulated. We limit access to Customer data to a select few employees who need it to provide support and troubleshooting on our Customers' behalf. Accessing data center information as well as Customer data is done on an as-needed basis or to provide support and maintenance.

### **How we Use Information**

Except as expressly set forth herein, we will not share Identifying Information with third parties without the express permission of the individual identified in such information and the Customer. We may use Identifying Information internally – for example, to help diagnose problems with our servers, to make Comeet more useful, to customize Comeet and personalize its content.

We allow authorized representatives of Customers to access the Identifying Information which they inputted or which was inputted by Users in order to apply for a position with such Customer.

We may share your Identifying Information with:

- Members of our corporate family, or third party vendors or service providers, such as email service providers sending emails on our behalf. We may also authorize third party vendors or service providers to collect information on our behalf.
- Business partners with whom we may jointly offer products or services, or whose products or services may be offered on our Site. You can tell when a third party is involved in a product or service because their name will appear, either alone or with ours. If you choose to use these products or services, we may share information about you, including your Identifying Information, with those partners. Please note that we do not control the privacy practices of these third party business partners. If you wish to no longer allow that third party to use your information, please contact that third party directly.
- Referring websites. If you were referred to this website from another site (for example, through a link), we may share some information about you with that referring website. We encourage you to review the privacy policies of any website that referred you here. Additionally, when you link to one of our partners from our Site and/or Solution, we provide that partner with a unique identifier so they know that you were referred from our Site and/or Solution. This unique identifier will not contain any of your Identifying Information.

We may use Users' or Prospects' Identifying Information in order to send notifications with respect to the employment process.

In addition, by analyzing all information we receive, including all information concerning use of the Solution and the browsing habits of end user of websites that incorporate the Solution, we may compile anonymous statistical information ("**Statistical Information**"). Statistical Information helps understand trends and customer needs.

Statistical Information is anonymous and we will not link Statistical Information to any Identifying Information. We may share such Statistical Information with our partners, without restriction, on commercial terms that we can determine in our sole discretion.

### **Cookies**

A cookie is a small piece of text that is sent to a visitor's browser. The browser provides this piece of text to the device of the originating visitor when this visitor returns. Comeet uses cookies to help personalize your Comeet experience. A "persistent" cookie may be used to help save your settings and customizations across site visits. Also, if you log in to Comeet, such a cookie will be used to recognize you as a valid user so you will not need to log in each time you use Comeet. Most Web browsers are initially configured to accept cookies, but you can change this setting so your browser either refuses all cookies or informs you when a cookie is being sent. Also, you are free to delete any existing cookies at any time. Please note that some features of Comeet may not function properly when cookies are disabled or removed.

### **Online Links to Other Sites**

You can link to other websites of third parties that provide useful information/services. Any Identifying Information you provide on the linked pages is provided directly to this third party and is subject to this third party's provider's privacy policy. We advise you check these privacy policies. We do not have access to the information collected by those third party websites or by our partners. Except as described in this Privacy Policy, we are not responsible for the content or privacy practices of third party websites to which we or our partners link.

### **Use of Comeet by Children**

We do not knowingly collect personally identifiable information from children under the age of 14. In the event you become aware that somebody under the age of 14 has enrolled without parental permission, please inform us immediately. Potential employers, recruiters or manpower agencies may not provide information with respect to potential employees under the age of 14.

### **Third Parties**

Please be aware that this Privacy Policy only describes the policies of Comeet. Comeet does not control how Customers and/or entities using the Solution may make use of User's information, including any Identifying Information. Comeet shall have no responsibility or liability for the collection, use or storage of any data by any other entity, including without limitation any Customer or potential or actual employer making use of the Solution. Users should not provide any information to any entity unless they are comfortable with the privacy policies of such entity.

### **Correcting or Updating your Information**

We provide the Solution as a service to our Customers. If you have provided Identifying Information to a Customer by means of the Solution, for example, in applying for a position, please contact such Customer with any questions or requests regarding your Identifying Information.

We allow Customers to view the information they provided during registration or when uploading potential employee's data and to alter any data, inaccuracies or errors. We also allow Users to view the information they provided when requesting to receive emails from us to alter any data, inaccuracies or errors. To request such access, or correct, update, or amend your Identifying Information please contact us at the following e-mail address, postal address or telephone number:

E-mail address: [info@comeet.co](mailto:info@comeet.co)

Postal Address: 550 S. California Ave, Palo Alto

Telephone number: 650-433-9027

We will retain your information for as long as your account is active or as needed to provide you services. If you wish to cancel your account or request that we no longer use your information to provide you services, please contact us at the e-mail address, postal address, or telephone number listed above. We will retain User data in a manner consistent with our obligations to our Customers. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

### **Communications**

We may send you email or other messages about us or our products and services. By accepting the Terms of Service (including the terms of this Privacy Policy which are incorporated therein) or using the Solution, you affirmatively consent to receive such commercial messages. You can ask to have your Identifying Information removed from our mailing list and stop receiving future communication from us by following the unsubscribe link located at the bottom of each communication or by emailing us at [info@comeet.co](mailto:info@comeet.co). You will also be given the opportunity to unsubscribe from commercial messages in any such email or other message we send. Please note that we reserve the right to send you service related communications, including service announcements and administrative messages, relating either to your account or to your transactions on this site, without offering you the opportunity to opt out of receiving them unless you cancel your account.

### **Other Uses or Transfer of Your Information**

We will fully cooperate with any law enforcement authorities, regulatory or government bodies, or court order requesting or directing us to disclose any information. We may use subcontractors that are located in countries other than your own, and send them information we receive. For example, we may send your information to any countries outside the United States or the European Economic Area. All our subcontractors will be subject to nondisclosure and non-use obligations. Nevertheless, some countries may have levels of protection of personal and other information which are not as high as in your country of residence or business.

We may transfer our databases containing your Identifying Information if we sell our business or part of it.

### **Changes**

Comeet may update this Privacy Policy from time to time - we encourage you to review it periodically.

### **Comments and Questions**

If you have any comments or questions about our privacy policy, please contact us at [info@comeet.co](mailto:info@comeet.co).

Last updated: May 2015