

Efficient Hire Privacy Policy

Updated: July 2020

The Privacy Policy describes the data protection practices of EF Operating, LLC and its affiliated companies (together referred to as “Efficient Hire” “we,” “us,” or “our”). This Privacy Policy applies to all websites owned and operated by us that link to this Privacy Policy, and related online and offline services (collectively, the “Services”).

Efficient Hire is a provider of cloud-based services to help ‘Employers’ with recruiting and onboarding ‘Employees’. When applicable, we have made distinctions in these sections between Employees and Employers to be transparent about the different situations in which we may collect, use, or share personal information.

When we handle information about Employees who use our Services to fill out job applications or onboarding documents/forms for specific Employers or otherwise communicate directly with Employers (“Employer Engagement”), we do so on behalf of the Employers as a service provider. Employers determine how to engage with Employees through our Services and thus act as the business that determines the purposes and means of handling Employee data in relation to Employer Engagements. In those circumstances, Employees are ultimately subject to the privacy policies of the Employers with which they interact, and they should read those policies carefully. Efficient Hire is not responsible for the privacy practices of Employers. Efficient Hire acts as the business and not a service provider when Employees build profiles and use related services.

PLEASE READ THIS PRIVACY POLICY CAREFULLY TO UNDERSTAND HOW WE HANDLE YOUR INFORMATION. By using Efficient Hire Services, you are expressly and voluntarily accepting the terms and conditions of this Privacy Policy and our Electronic Consent that allow us to process information about you.

1. Data We Collect

- **Data We Collect from and About Employees**

We collect personal information in order to successfully provide Efficient Hire Services through the means outlined below. The information we collect and the purpose for which we use it will depend to some extent on the specific Services you use and how you interact with us. The following table describes the categories of information about you that we collect and how we use such information:

Categories of information collected	Purposes of use	Sources of information
Account information , e.g. name, DOB, username, password, email address, phone number, wireless device, city, state, ZIP code, and U.S. work eligibility ("Yes" or "No")	<ul style="list-style-type: none"> • Provide the Services • Communicate with you • Secure our Services and users • Fraud prevention and legal purposes 	<ul style="list-style-type: none"> • Employees • Employers
Contact information , e.g. name, email address, postal address, and phone number	<ul style="list-style-type: none"> • Provide the Services • Application information and employment onboarding • Communicate with you • Secure our Services and users • Fraud prevention and legal purposes 	<ul style="list-style-type: none"> • Employees • Employers
Demographic and statistical information , e.g. gender, race, age, date of birth, health information, apparel size, marital status, military and veteran status, nationality, disability information, criminal history information, educational history, employment history, professional licenses, schedule and availability, responses to custom questions.	<ul style="list-style-type: none"> • Provide the Services • Application information and employment onboarding • Communicate with you • Secure our Services and users • Fraud prevention and legal purposes 	<ul style="list-style-type: none"> • Employees
Personal identifiers and employment eligibility information , e.g. photographs, driver's license number, operator's license number, motor vehicle license number, passport number, Social Security Number, other state or federal-issued identification numbers, and	<ul style="list-style-type: none"> • Provide the Services • Application information and employment onboarding • Secure our Services and users • Fraud prevention and legal purposes 	<ul style="list-style-type: none"> • Employees • Employers

Categories of information collected	Purposes of use	Sources of information
information you provide on tax and other government forms.		
Financial and transactional information , e.g. bank account number and pay card information.	<ul style="list-style-type: none"> • Employment onboarding • Fraud prevention and legal purposes 	<ul style="list-style-type: none"> • Employees
Customer service information , e.g. questions and other messages you address to us directly through online forms, by mail, over the phone, and summaries or voice recordings of your interactions with our customer support team.	<ul style="list-style-type: none"> • Provide the Services • Communicate with you • Secure our Services and users • Fraud prevention and legal purposes 	<ul style="list-style-type: none"> • Employees • Employers
Communications with other users , e.g. messages and information surrounding those messages such as the date/time of the communication.	<ul style="list-style-type: none"> • Provide the Services • Employment application/onboarding • Secure our Services and users • Fraud prevention and legal purposes 	<ul style="list-style-type: none"> • Employees • Employers
Information about others , e.g. if you submit information about your references or former employers; or if you use a "tell-a-friend" tool (or similar feature) that allows you to send information to another person, we will collect, at a minimum, the recipient's contact information. In providing this information, you represent that you are authorized to provide it.	<ul style="list-style-type: none"> • Provide the Services • Employment onboarding • Fraud prevention and legal purposes 	<ul style="list-style-type: none"> • You • Other users (if you are the recipient of a communication)

Categories of information collected	Purposes of use	Sources of information
Geolocation , e.g. city, state, country, and ZIP code associated with your residence address.	<ul style="list-style-type: none"> • Provide the Services • Secure our Services and users • Fraud prevention and legal purposes 	<ul style="list-style-type: none"> • Employees • Employers
Other information , e.g. any other information you choose to directly provide to us in connection with your use of the Services.	<ul style="list-style-type: none"> • All purposes listed above 	<ul style="list-style-type: none"> • Employees

- **Data We Collect from and About Employers**

We also collect information from Employers to provide the Services. The information we collect and the purpose for which we use it will depend to some extent on the specific Services you use and how you interact with us. The following table describes the categories of information about you that we collect and how we use such information:

Categories of information collected	Purposes of use	Sources of information
Account information , e.g. name, phone number, email address, postal address, username, password.	<ul style="list-style-type: none"> • Provide the Services • Communicate with you • Secure our Services and users • Fraud prevention and legal purposes 	<ul style="list-style-type: none"> • Employers
Business or company information , e.g. business name, industry, FEIN, business phone number, location(s), links to external business websites, pictures, business logo.	<ul style="list-style-type: none"> • Provide the Services • Secure our Services and users • Fraud prevention and legal purposes 	<ul style="list-style-type: none"> • Employers
Financial and transactional information , e.g. credit card	<ul style="list-style-type: none"> • Provide the Services 	<ul style="list-style-type: none"> • Employers

Categories of information collected	Purposes of use	Sources of information
information, bank account information, billing address.	<ul style="list-style-type: none"> • Fraud detection and prevention • Secure our Services and users • Fraud prevention and legal purposes 	
Employment opportunity information , e.g. title, wage range, location(s), availability information, desired qualifications and skills, job description and expectations, job postings.	<ul style="list-style-type: none"> • Provide the Services • Communicate with you • Application information and Employment onboarding 	<ul style="list-style-type: none"> • Employers
Geolocation , e.g. city, state, country, and ZIP code associated with your business locations.	<ul style="list-style-type: none"> • Provide the Services • Secure our Services and users • Fraud prevention and legal purposes 	<ul style="list-style-type: none"> • Employers
Other information , e.g. any other information you choose to directly provide to us in connection with your use of the Services.	<ul style="list-style-type: none"> • All purposes listed above 	<ul style="list-style-type: none"> • Employers

- **Additional Information**

The following information provides additional information about the purposes for collecting and using your information.

2. Purposes of Use

Provide the Services, for example:

- Creating a profile and saving selected job postings, completing employee onboarding.
- Displaying job opportunities and potential candidates
- Processing and fulfilling your requests and transactions

- Assisting you in submitting, requesting, processing, or reviewing an application or onboarding transaction
- Engaging in analysis, research, measuring and reports to better understand how you use the Services, so we can improve them, develop them, and fix errors
- Sending communications that you have requested on your behalf
- Understanding and resolving issues being reported

Application information and employee onboarding, for example:

- Applying for a job
- Conducting background check and employment eligibility screenings
- Complying with applicable laws, including federal and state employment law
- Arranging for financial deposits and transactions and relevant trainings
- Facilitating logistics for employment, such as custom questions relating to uniform sizing, footwear, or other employment related questions

Communicate with you, for example:

- Responding to your requests for information and provide you with more effective and efficient customer service and technical support, including to investigate, respond to and resolve incidents and complaints
- Keeping you updated regarding job opportunities, interview requests, application reminders, and/or jobs you are interested in
- Informing Employers about new applicants to posted jobs, account-specific information, and/or offers regarding our Services
- Providing you with transactional updates and information about the Services (e.g., inform you about updates to our Services, information about your account, or information about ecommerce transactions that you conduct on the Services)
- In accordance with applicable legal requirements, contacting you by email, postal mail, phone, or SMS regarding our Services.

Secure our Services and users, for example:

- Monitoring, preventing, and detecting fraud, such as through verifying your identity
- Combatting spam or other malware or security risks
- Monitoring, enforcing, and improving the security of our Services

Fraud detection and prevention, defending our legal rights and compliance with the law, for example:

- Complying with any applicable procedures, laws, and regulations where it is necessary for our legitimate interests or the legitimate interests of others
- Establishing, exercising, or defending our legal rights where it is necessary for our legitimate interests or the legitimate interests of others (e.g., to enforce compliance with our Electronic Consent, Privacy Policies, or to protect our Services, users, or others)

Combined Information. For the purposes discussed in this Privacy Policy, we may combine the information that we collect through the Services with information that we receive from other sources, both online and offline, and use such combined information in accordance with this Privacy Policy.

Consent. We may use all the categories of information set forth above for any purpose with your consent.

Do Not Track. Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. We are committed to providing you with meaningful choices about the information collected on our website for online advertising and analytics purposes, and that is why we provide the variety of opt-out mechanisms listed above. However, we do not currently recognize or respond to browser initiated DNT signals. Learn more about [Do Not Track](#).

4. How We Share Data

A. Employee Data

We will share the information collected from and about you as discussed above for various business purposes. The chart below explains the categories of third parties with which we may share your information, and the categories of information we may share with each. Additionally, we may share all the categories of information with your consent.

Third Parties with which we share information and why	Categories of information shared
Service Providers that Perform Services on our Behalf. Such service providers include billing and payment processing, technical support and customer service, fulfillment, data storage, security, fraud prevention, risk audits, and legal services.	<ul style="list-style-type: none">• All categories of information we collect may be shared with our service providers
Employers, Services, and Vendors. We will share your information with Employers and services at your request. For example, if you apply for a job, we may share the information with the relevant Employer. Moreover, we may share your information with vendors performing services on behalf of the Employers, for instance, a background check provider, identity verification provider, or payroll provider.	<ul style="list-style-type: none">• Contact and account registration information• Demographic and statistical information• Personal identifiers and employment eligibility information• Employment opportunity information• Financial and transactional information• Communications with other users• Information about others• Other information

Third Parties with which we share information and why	Categories of information shared
<p>Third Parties for Legal Purposes. By using the Services, you acknowledge and agree that we may access, retain, and disclose the information we collect and maintain about you if required to do so by law or in a good faith belief that such access, retention or disclosure is reasonably necessary to: (a) comply with legal process or a regulatory investigation (e.g. subpoena or court order); (b) enforce our Terms of Service, the Privacy Policy, or other contracts with you, including investigation of potential violations thereof; (c) respond to claims that any content violates the rights of third parties; and/or (d) protect the rights, property or personal safety of Efficient Hire, its agents and affiliates, its users and/or the public. This includes exchanging information with other companies and organizations for fraud protection, and spam/malware prevention, and similar purposes.</p>	<ul style="list-style-type: none"> All categories of information we collect may be shared for legal purposes
<p>Third Parties in a Business Transaction. We may disclose information in connection with a corporate transaction, including for example a merger, investment, acquisition, reorganization, consolidation, bankruptcy, liquidation, or sale of some or all our assets.</p>	<ul style="list-style-type: none"> All categories of information we collect may be shared in connection with a business transaction

B. Employer Data

We will share the information collected from and about you as discussed above for various business purposes. The chart below explains the categories of third parties with which we may share your information, and the categories of information we may share with each. Additionally, we may share all the categories of information with your consent.

Third Parties with which we share information and why	Categories of information shared
<p>Service Providers that Perform Services on our Behalf. Such service providers include billing and payment processing, sales, marketing, advertising, data analysis and insight, research, technical support and customer service, fulfillment, data storage, security, fraud prevention, risk audits, and legal services.</p>	<ul style="list-style-type: none"> All categories of information we collect may be shared with our service providers

Third Parties with which we share information and why	Categories of information shared
<p>Third Parties for Legal Purposes. By using the Services, you acknowledge and agree that we may access, retain, and disclose the information we collect and maintain about you if required to do so by law or in a good faith belief that such access, retention or disclosure is reasonably necessary to: (a) comply with legal process or a regulatory investigation (e.g. subpoena or court order); (b) enforce our Terms of Service, the Privacy Policy, or other contracts with you, including investigation of potential violations thereof; (c) respond to claims that any content violates the rights of third parties; and/or (d) protect the rights, property or personal safety of Efficient Hire, its agents and affiliates, its users and/or the public. This includes exchanging information with other companies and organizations for fraud protection, and spam/malware prevention, and similar purposes.</p>	<ul style="list-style-type: none"> • All categories of information we collect may be shared for legal purposes
<p>Third Parties in a Business Transaction. We may disclose information in connection with a corporate transaction, including for example a merger, investment, acquisition, reorganization, consolidation, bankruptcy, liquidation, or sale of some or all of our assets.</p>	<ul style="list-style-type: none"> • All categories of information we collect may be shared in connection with a business transaction

5. Your Choices and Rights

You have certain rights with respect to your information as further described in this Section, in addition to any rights discussed elsewhere in this Privacy Policy. Please note your rights and choices vary depending upon your location.

Account information.

We encourage you to periodically review and update your settings and profile information to reflect your job and communication preferences. You can access these settings at any time by logging in. If you would like us to inactivate your account, you can reach out to us and we will do so.

Privacy Rights for California Residents.

If you are a California resident, California law requires us to provide you with some additional information regarding your rights with respect to your “personal information” (as defined in the California Consumer Privacy Act (“CCPA”)).

If you are a California resident, the CCPA allows you to make certain requests about your personal information. Specifically, the CCPA allows you to request us to:

- Inform you about the categories of personal information we collect or disclose about you; the categories of sources of such information; the business or commercial purpose for collecting your personal information; and the categories of third parties with whom we share/disclose personal information.
- Provide access to and/or a copy of certain personal information we hold about you.
- Delete certain personal information we have about you.
- Provide you with information about the financial incentives that we offer to you, if any.

The CCPA further provides you with the right to not be discriminated against (as provided for in applicable law) for exercising your rights.

Please note that certain information may be exempt from such requests under California law. For example, we need certain information in order to provide the Service to you. We also will take reasonable steps to verify your identity before responding to a request, which may include, at a minimum, depending on the sensitivity of the information you are requesting and the type of request you are making, verifying your name, email address, phone number, or other information. You are also permitted to designate an authorized agent to submit certain requests on your behalf. In order for an authorized agent to be verified, you must provide the authorized agent with signed, written permission to make such requests or a power of attorney. We may also follow up with you to verify your identity before processing the authorized agent's request. Certain information may be exempt from such requests under applicable law. For example, we need certain types of information so that we can provide the Services to you or to comply with a legal obligation. In some circumstances if you still ask us to delete your information, you may no longer be able to access or use our Services. If you would like further information regarding your legal rights under California law or would like to exercise any of them, please contact us at support@efficienthire.com.

California residents may opt out of the "sale" of their personal information. We do not "sell" California residents' personal information under the CCPA, based on our current understanding of the definition of sell. We do share certain information as set forth in Section 3 and allow third parties to collect certain information about your activity, for example through cookies, as explained in Section 2.

Regarding personal information collected by Employers through Employer Engagements, Employees should direct requests to exercise applicable rights to the Employer on whose behalf we handle the data. If we receive a request from an Employee directly in relation to information collected through an Employer Engagement, we will refer that request to the appropriate Employer(s) and await each Employer's instructions on how to handle it.

California "Shine the Light" Disclosure.

The California "Shine the Light" law gives residents of California the right under certain circumstances to opt out of the sharing of certain categories of personal information (as defined in the Shine the Light law) with third parties for their direct marketing purposes. We do not share your personal information with third parties for their own direct marketing purposes.

Privacy Rights for Nevada Residents.

Under Nevada law, certain Nevada residents may opt out of the "sale" of "covered information" (as such term is defined under Nevada law) for monetary consideration to a person for that person to license or sell such information to additional persons. "Covered information" includes first and last

name, address, email address, phone number, Social Security Number, or an identifier that allows a specific person to be contacted either physically or online.

We do not engage in such activity; however, if you are a Nevada resident who has purchased services from us, you may submit a request to opt out of the sale of your covered information under Nevada law by emailing us at support@efficientforms.com. Please note we will take reasonable steps to verify your identity and the authenticity of the request.

6. How We Protect Your Data and Our Services

We take measures to protect your information against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure, and access. However, no method of transmission over the internet, and no means of electronic or physical storage, is absolutely secure. By using our Services, you acknowledge and accept that we cannot guarantee the security of your information and that use of our Services is at your own risk. You are responsible for keeping your account information—and especially your login information—confidential. We ask you not to share your login credentials with anyone.

When you sign up for an account, you may be required to establish a username and password. If you create an account with us, you are responsible for maintaining the confidentiality of your account password and for any activity that occurs under your account. We are not responsible for any loss or damage arising from your failure to maintain the confidentiality of your password.

If you use messaging features that allow you to interact with Employers or Employees directly through our Services, please note that these communications are not encrypted and, for security purposes, you should not include any passwords, social security numbers, payment card information, or other sensitive information in such communications.

7. Retention of your Information

We store and maintain your information for the purposes for which it is processed by us. The length of time for which we retain information depends on the purposes for which we collected and use it and/or as required to comply with applicable laws.

8. Your Obligations

Employees and Employers have obligations that they must abide by in order to use the Services:

1. You must, always, abide by the terms and conditions of the then-current Privacy Policy and Electronic Consent. This includes respecting all intellectual property rights that may belong to third parties.
2. You must keep your username and password confidential and not share it with others
3. Any violation of these guidelines may lead to the restriction, suspension or termination of your account at our sole discretion.

9. Third-Party Links and Features

The Services contain links to third-party services, and you may also integrate our Services with third-party services. For example, an Employee may click a job application link that takes them to a third-party website hosted by an Employer or a third-party. If you choose to use these third-party services or features, you may disclose your information not just to those third parties but also to their users and the public more generally, depending on how their services function. Efficient Hire is not responsible for the content or practices of such third-party services. The collection, use, and disclosure of your information will be subject to the privacy policies of the third-party services, and not this Privacy Policy. We urge you to read the privacy and security policies of these third parties.

10. Changes to our Privacy Policy

We reserve the right to amend this Privacy Policy at any time. We will make the revised Privacy Policy accessible through the Services, so you should review the Policy periodically. You can know if the Privacy Policy has changed since the last time you reviewed it by checking the “Effective Date” at the beginning of this Privacy Policy. If we make a material change to this Privacy Policy, we will provide you with notice in accordance with legal requirements. By continuing to use the Services, you are confirming that you have read and understood the latest version of this Privacy Policy.

11. Contact Information

If you wish to contact us or have any questions about or complaints in relation to this Privacy Policy, please email us at support@efficientforms.com. Please note that your communications with us may not necessarily be secure. Therefore, please do not include credit card information and/or other sensitive information in your communications with us.