

Exact Staff, Inc. Online Privacy Notice

Exact Staff, Inc. and its family of companies which includes those listed here [click here](#) (collectively, "Exact Staff", or "we") are committed to safeguarding your privacy. Our Online Privacy Notice ("Notice") explains what information we may collect, use, share, and store about you, and the choices and rights that are available to you. If you have any questions about this Notice, please contact us using the contact details provided below at [contact us](#)

When this Notice Applies

"Personal information" consists of information which may directly or indirectly identify you. This Notice applies to our collection, use, and disclosure of your personal information:

- through our website(s) and related applications and content that link or refer to this Notice (including the Exact Staff websites listed here: [Exact Staff websites](#); and Exact Staff computer or mobile software applications ("apps") and content made available to you) (collectively the "Sites");
- in connection with any of our events or sales, marketing, advertising, and recruitment activities, or in the course of providing other Exact Staff Services to you (collectively with the Sites); and
- when receiving services from you.

In some cases, we may provide additional data privacy notices specific to certain products, practices, or regions. Those terms are to be read in conjunction with this Notice. This Notice does not apply to the practices of third parties that Exact Staff does not own or control.

Collection and Use of Personal Information

Categories of Individuals Whose Personal Information We Process Includes:

- **Visitors:** individuals who visit or use our Site(s) or any other Exact Staff Services, so that we can provide them with the Site(s) or Exact Staff Services they require;
- **Job seekers:** individuals that apply for job opportunities with Exact Staff to fill our internal positions or as part of our staffing and recruiting services or with Exact Staff's customers through our search, workforce management, or talent advisory services (in each case, whether such applications are made online or offline);
- **Customers, vendors, service providers, and other suppliers:** employees, representatives and/or agents of our customers, service providers, vendors, and other suppliers or individuals with whom we have a business relationship and/or manage on behalf of our customers; and
- **Referees and others who advise on the suitability of job seekers:** If you submit any personal information relating to other people to us or to our service providers in connection with the Exact Staff Services, you confirm that you have the authority to do so and to permit us to use the information in accordance with this Notice.

How We Collect Information Includes:

- **Information submitted directly:** Exact Staff collects personal information that individuals provide to us through our Services, for instance by completing an online form or creating an account on our Site(s). Where we request information from you, we will inform you prior to collection whether the provision of

the personal information may be provided on a voluntary basis, and the consequences of not providing the information.

- **Information we collect automatically:** Exact Staff and our service providers may automatically collect certain technical information from visitors to our site(s) and users of our app(s) by, for example, our use of cookies placed on your device.
- **Information we obtain from other sources or third parties:** We may receive or acquire information about our visitors, job seekers, customers, and service providers from third-party partners (such as background check providers and providers of professional databases) or a job seeker’s, customer’s, or vendor’s third-party reference. Additionally, we collect information from our social media online forums, blogs, and message boards when you choose to interact with them. In addition, we collect personal information you make available on your public social network profiles and other public locations, including, for example, Facebook, LinkedIn, Twitter, Instagram, or other company websites and/or job boards.

The Types of Personal Information We Collect Includes:

Category of Personal Information	Types of Personal Information	Business Purposes
Identifiers	<p>Identifying Information: includes name, username and password, citizenship status, and government issued IDs</p>	<ul style="list-style-type: none"> • To create, manage, and administer the Exact Staff Services and for internal operations. • To provide information on goods and services you have requested. • To match job seekers to job positions. • To match job positions to job seekers. • To meet our legal obligations when acting as an employer and potential employer • To make contact in an emergency. • To help you search and enroll in career education classes.
		<ul style="list-style-type: none"> • To notify you about changes to our Site(s) or other Exact Staff Services. • To personalize and deliver content about our Services to you. • To send you e-mails, SMS messages, and

	<p>Contact Information: includes email address, telephone number, postal address, and contact information of referrals, references, or emergency contacts</p>	<p>other promotional communications about Exact Staff through marketing, advertising, and promotions, for example, newsletters, surveys, articles of interest, press releases, and job fair or other event announcements according to your marketing preferences.</p> <ul style="list-style-type: none"> • To comply with applicable laws and government regulations. • To create anonymized aggregated statistics. • To deal with disputes and take legal action or other professional advice.
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<p>Professional, Employment related, and Educational</p>	<p>Professional Information: includes resume or C.V., employment history, education history, certifications, language proficiencies, awards, security clearance information, work authorization, and other work-related skills</p>	<ul style="list-style-type: none"> • Same as above.
	<p>Preference Information: includes career interests, desired compensation, desired work location, career advancement interests and benefits</p>	
<p>Audio, Visual, or Similar Information</p>	<p>Audio, Visual, or Similar Information: includes video/telephonic interviews, phone call recordings, and video captured by our security systems</p>	<ul style="list-style-type: none"> • Same as above.
<p>Inferences</p>	<p>Inference Information: includes assessments of abilities</p>	<ul style="list-style-type: none"> • Same as above. • To combine information within this table to create holistic profiles of our customers and talent to personalize our Services and tailor them to each customer's and talent's abilities and preferences.

<p>Commercial Information</p>	<p>Transactional Information: includes purchasing, sales, transactions, taxes, purchases and spending habits</p>	<ul style="list-style-type: none"> • Same as above. • To enhance, improve, or modify the provision of our Services and Sites, for our customers. • To identify usage or purchase trends. • To maintain market awareness.
<p>Internet or Other Electronic Network Activity</p>	<p>Computer Device Information: includes IP address, browser type and version, time zone setting, browser plug-in types and versions, operating system and platforms</p>	<ul style="list-style-type: none"> • To protect the Exact Staff Services. • To conduct data analysis, audits, fraud monitoring and prevention, to develop new products, services and offerings meant to enhance, improve or modify our Sites. For more information about what we collect please see the cookies and online tracking section of this Notice. • To provide and administer the Exact Staff Services and for internal operations (for example, audit, troubleshooting, data analysis, statistical, and survey purposes). • To ensure network and infrastructure security.
	<p>Behavioral Information: includes length of visits to certain pages and results from surveys</p>	

Sensitive Personal Information

You may be asked for types of personal information that are viewed as sensitive personal information. Sensitive personal information includes, for example, government- issued identification numbers. Exact Staff will process that personal information in accordance with applicable data protection laws.

Failure to Provide Information Where Required

There will be times when we request information from you in order to provide Services. If you do not provide the information that we have identified as required, we may be unable to properly provide you with these Services.

Legal Basis for Processing Personal Information

Our legal basis for processing personal information about individuals will depend on the type of personal information and the purpose for which we collect it. However, we will normally collect personal information from you only where:

- We need the personal information to perform a contract with you;
- The processing is in our legitimate interest and not overridden by your rights;
- We have your consent to do so; or
- There is a legal obligation to collect personal information from you.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time.

If we collect and use your personal information in reliance on our legitimate interests (or those of any third party), this interest will normally be to operate our platform and to communicate with you as necessary to provide our services to you and for our legitimate commercial interest; for instance, when responding to your queries, improving our services, undertaking marketing, or for the purposes of detecting or preventing illegal activities. We may have other legitimate interests and if appropriate we will make clear to you at the relevant time what those legitimate interests are.

You may choose to provide your personal information with Exact Staff for a particular position for which you are not successful. In such a situation, as you have indicated that you are looking for opportunities beyond your current role, Exact Staff may retain your personal information in order to present you with other opportunities for which your experience may be suitable. If you have concerns about Exact Staff retaining this data for these purposes please discuss them with your contact at Exact Staff.

If you would like further information on our legitimate interests as applied to your personal information, please [contact us](#).

Sharing Your Personal Information

Exact Staff does not sell your personal information. Exact Staff may share and disclose personal information about you in the following circumstances:

- **Potential employers or potential customers** – We may share your personal information at your direction if you are a job seeker with a customer for the purpose of providing Services (such as staffing and recruiting services, or search, workforce management, or talent advisory services). To the extent you are employed by a customer of Exact Staff through our search, workforce management, or talent advisory services, the Exact Staff customer will process such personal information in accordance with its own policies and procedures.
- **Compliance with laws, government, and law enforcement** – We may disclose personal information where we are legally required to do so in order to respond to or comply with any applicable law, regulation, subpoenas, court orders, legal process, or government requests, including in response to public authorities to meet national security or law enforcement requirements.
- **Vendors, consultants, and other service providers** – We use vendors, consultants, and other service providers to assist us in providing the Exact Staff Services, and it may be necessary for us to provide access to your personal information (for example, IT vendors who support our systems, background check vendors, and premises security management for video security and badge access).
- **Business transfers and corporate reorganization** – Circumstances may arise where, whether for strategic or other business reasons, Exact Staff decides to sell, buy, merge, or otherwise reorganize businesses. Such a transaction may involve, in accordance with applicable law, the disclosure of personal information to prospective or actual purchasers, or the receipt of it from sellers. It is Exact Staff's practice to seek appropriate protection for information in these types of transactions.
- **Vital interests and legal rights** – We may collect and possibly share personal information and any other additional information available to us in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of Exact Staff's terms of use, or as otherwise required by law, including without limitation to meet national security or law enforcement requirements. We also may disclose your personal information when we choose to establish or exercise our legal rights or defend against legal claims.
- **With your consent** – We may disclose your personal information for other purposes with your consent.

Sharing Your Personal Information within Exact Staff

Exact Staff may disclose your personal information to any affiliate within Exact Staff for use in accordance with this Privacy Notice. This includes our subsidiaries, affiliates, and our ultimate holding company.

This sharing of personal information with Exact Staff affiliates may include combining the personal information gathered by certain Exact Staff Sites with information independently gathered on other Exact Staff Sites as well as information gathered offline into one or more database(s) useable by Exact Staff . Again, this combined information will only ever be used for the purposes disclosed within this Notice.

Your Privacy Rights and Choices

We respect your right to access and control your information and we comply with applicable data protection laws and regulations. We will process your rights requests in compliance with applicable data protection laws and regulations. The availability of these rights and the ways in which you can exercise them are set out below.

Nevada Privacy Rights

Although we do not currently conduct sales of personal information, Nevada residents may submit a request directing us to not sell personal information we maintain about them if our practices change in the future.

To exercise this right, please contact us:

- By email at datasubjectrequests@exactstaff.com .

California Privacy Rights

For individuals residing in California, you are given rights under the California Consumer Privacy Act (“CCPA”) about “personal information” pertaining to you, as defined by the CCPA. If you are an Exact Staff employee or prospective employee, much of the personal information pertaining to you is exempt from the CCPA—your rights under the CCPA will be addressed in a separate notice provided to you. For other individuals residing in California, the following disclosures apply:

Personal Information We Collect and Disclose for a Business Purpose: We collect the categories of personal information about California residents identified in the chart below. As further set forth in the chart below, in the past 12 months, we have disclosed California residents’ personal information to third parties for business or commercial purposes.

Categories of Personal Information	Collected in the last 12 months:	Categories of sources from which information is collected:	Business or commercial purposes for collection, use, and sharing:	Disclosed for business purposes to the following categories of third parties:
Personal and online identifiers (such as first and last name, email address, or unique online identifiers)	Yes	All categories listed below.	All purposes listed below.	All categories listed below.
Categories of information described in Section 1798.80(e) of the California Civil Code (such as telephone number, driver’s license or state identification card)	Yes	All categories listed below.	All purposes listed below.	All categories listed below.
Commercial or transactions information (such as records of personal property or products or services)	Yes	All categories listed below.	All purposes listed below, as well as to identify usage and purchase trends.	All categories listed below.

purchased, obtained or considered)				
Internet or other electronic network activity information (such as browsing history, search history, interactions with a website, email, application, or advertisement)	Yes	All categories listed below.	For all business purposes listed below.	All categories listed below.
Biometric information (such as call recordings)	Yes	All categories listed below.	All purposes listed below.	All categories listed below.
Sensory information (such as audio, electronic, visual, thermal, olfactory, or similar information)	Yes	All categories listed below.	All purposes listed below.	All categories listed below.
Professional or employment-related information	Yes	All categories listed below.	All purposes listed below.	All categories listed below.
Education information	Yes	All categories listed below.	All purposes listed below.	All categories listed below.
Inferences drawn from the above information about your predicted characteristics and preferences	Yes	All categories listed below.	All purposes listed below.	All categories listed below.
Other information about you that is linked to the personal information above	Yes	All categories listed below.	All purposes listed below.	All categories listed below.

Categories of Sources: We collect this personal information from the following categories of sources:

- Visitors to our Site(s);
- Individuals applying for job opportunities;
- Exact Staff clients;
- Service providers;
- Background check providers;
- Providers of professional databases;
- Social media online forums and profiles; and
- Affiliates not under the Exact Staff brand.

Why We Collect, Use, and Share California Information: We use and disclose the personal information we collect for our commercial and business purposes, as further described in this Privacy Notice. These commercial and business purposes include, without limitation:

- Our commercial purposes, including providing services to our customers, advertising, and marketing.
- Our business purposes as identified in the CCPA, which include:
 - Auditing related to our interactions with you;
 - Legal compliance;
 - Detecting and protecting against security incidents, fraud, and illegal activity;
 - Debugging;
 - Performing services (for us or our service provider) such as account servicing, processing orders and payments, and analytics;
 - Internal research for technological improvement;
 - Internal operations;
 - Activities to maintain and improve our services; and
 - Other one-time uses.

Recipients of California Personal Information: We disclose the categories of personal information designated above to the categories of third parties listed below for business purposes:

- Service providers;
- Affiliates not under the Exact Staff brand;
- Exact Staff clients;
- Internet service providers;

- Data analytics providers; and
- Operating systems and platforms.

Your Rights Regarding Personal Information: California residents have certain rights with respect to the personal information collected by businesses. If you are a California resident, you may exercise the following rights regarding personal information about you, subject to certain exceptions and limitations:

- **Right to be Informed About Collection, Sale, or Disclosure:** You have the right to know the categories and specific pieces of personal information we collect, use, disclose, and sell about you, the categories of sources from which we collected your personal information, our purposes for collecting or selling your personal information, the categories of your personal information that we have either sold or disclosed for a business purpose, and the categories of third parties with which we have shared personal information;
- **Right of Deletion:** You have the right to request that we delete personal data that we collected from you, subject to certain exceptions.
- **Right to Opt-out of the Sale of Personal Information:** Exact Staff does and will not sell personal information to third parties.
- **Right Not to Be Discriminated Against for Exercising These Rights:** You have the right to be free of discrimination for exercising your consumer privacy rights. We will not deny you goods or services, charge different amounts or provide a different quality level of goods or services for exercising your rights unless the difference is reasonably related to the value of your data.

To exercise any of the above rights, please contact us using the following information and submit the required verifying information, as further described below:

- By phone at +1 877-364-2999
- By email at datasubjectrequests@exactstaff.com.

Verification Process and Required Information. Note that we may need to request additional information from you to verify your identity or understand the scope of your request, although you will not be required to create an account with us to submit a request or have it fulfilled. We will require you to provide, at a minimum your name, phone number and email address.

Authorized Agent. You may designate an authorized agent to make a CCPA request on your behalf by submitting the following form [click here](#).

Minors' Right to Opt In: We do not sell the personal information of minors under 16 years of age.

Other Jurisdictions

Under the laws of some jurisdictions you may have the right to request additional information about the personal data we collect, request access to the personal data we process, correct an error or omission, delete personal data, or object or limit further processing. Exact Staff will respect individual rights requests under those laws.

Additionally, if we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. This will not affect any processing of your personal information done before you withdrew your consent.

Your Choices:

Marketing Communications: Where it is in accordance with your marketing preferences and applicable data protection laws, we may periodically send you updates via e-mail about promotional opportunities or services we think may interest you, such as jobs in our database that match your selection criteria, newsletters, white papers, surveys and event information. You can opt-out of receiving marketing emails from us.

About Exact Staff, Inc.

Our services include:

Staffing and Recruiting	Temporary, Temporary-to-hire, and direct placement solutions to place the best qualified talent for every business need.
Search	Search and executive placement services ensure qualified talent and client companies collaborate to optimize human capital strategies.
Talent and Business Advisory	Insight and advice on how to best attract and retain a high-performing workforce. Facilitating online career education for talent to bridge any skill gaps for desired opportunities.
Workforce Management	Full time and contingent workforce solutions, including Recruitment Process Outsourcing (RPO), Managed Service Provider (MSP) solutions, and Vendor Management System (VMS) implementation to optimize human capital strategies.

Learn more about the specific services at www.exactstaff.com

Cookies and Online Tracking

Exact Staff websites use "cookies" to help personalize your online experience and for analytics purposes. For more information about cookies, the types of cookies we use, and how we use them, please see our [cookie notice](#).

Security of Your Personal Information

Exact Staff is committed to protecting the personal information you share with us. Exact Staff uses appropriate physical, technical, organizational and administrative security measures to help protect your personal information from unauthorized or unlawful access, use, or disclosure, and from accidental loss, destruction, or damage.

Data Retention

We retain personal information we collect from you where we have an ongoing business need to do so (for example, to provide you with the service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Children's Privacy

This site is not intended for use by persons under the age of 18. Exact Staff does not knowingly collect personal information from persons under the age of 18. If we learn that we have collected personal information from a person under the age of 18, we will delete that data from our systems.

Links to Other Sites and Public Forums

Our Sites may contain links to other sites for your convenience and information. If you access those links, you will leave our Sites. Exact Staff does not control those sites or their privacy practices, which may differ from Exact Staff's practices. Exact Staff is not responsible for the privacy practices or the content of other websites outside of Exact Staff. The personal information you choose to provide or that is collected by these third parties is not covered by this Notice. We encourage you to review the policies of such third parties before submitting your personal information.

Exact Staff may make message boards, news groups, and/or public forums available to users on its Sites. Any information that you disclose in these areas becomes public information that may be accessed by third parties; therefore, you should use caution before deciding to disclose any personal information in these forums.

Contact Us

If you have any questions, please contact:

Exact Staff, Inc.
21031 Ventura Blvd., Suite 501, Woodland Hills, CA 91302
ATTN: Data Subject Requests
datasubjectrequests@exactstaff.com

Effective Date: 01/01/2020

Changes to this Notice

If we change this Notice, we will post the revised Notice on our sites, with an updated revision date. If we make significant changes to our Notice, we may also notify you by other means, such as sending an email or posting a notice on our home page. We will update the "Effective Date" to indicate the date from which any changes take effect.