

## **CEIPAL Privacy Policy**

Effective date: November 22, 2024

At CEIPAL Corp. (“CEIPAL”) we take your privacy seriously. Please read this Privacy Policy to learn how we treat your personal information. **By using or accessing our Site in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent that we will collect, use, and share your information as described in this Privacy Policy.**

Remember that your use of CEIPAL’s Site is at all times subject to our Terms of Use, which incorporates this Privacy Policy. Any terms we use in this Policy without defining them have the definitions given to them in the Terms of Use. Please note that this privacy policy applies only to the information collected through our website and not information collected offline.

If you have a disability, you may access this Privacy Policy in an alternative format by contacting [compliance@ceipal.com](mailto:compliance@ceipal.com).

### **1) What this Privacy Policy Covers**

This Privacy Policy covers how we treat Personal Data that we gather when you access or use our Site. “Personal Data” means any information that identifies or relates to a particular individual and also includes information referred to as “personally identifiable information” or “personal information” under applicable data privacy laws, rules, or regulations. This Privacy Policy does not cover the practices of companies we don’t own or control or people we don’t manage.

### **2) What Information Does CEIPAL Collect?**

#### **A. Personal Data Collected for CEIPAL’s Customers Via Our TalentHire or Workforce Platforms (the “CEIPAL Services”)**

When CEIPAL collects and uses Personal Data in the performance of the CEIPAL Services for our business customers the following provisions will apply:

##### *The Personal Data Collected for CEIPAL’s Customers*

CEIPAL may collect, receive, process, and store Personal Data under the direction of its customers in the course of providing those customers with the CEIPAL Services. This Personal Data may include, but is not limited to, Personal Data as your name, phone number, job title, employer name, mailing address, email addresses, and other information identifiable to you such as information one would ordinarily expect to find on a resume. In addition, we collect Personal Data from our customers’ authorized users and account administrators (typically, their employees or agents) in order to provide them with accounts to access the CEIPAL Services. This information may include, but is not limited to, credential and profile data (such as name, contact information, employer, job title, and other relevant information).

CEIPAL has no direct relationship with the consumers whose Personal Data CEIPAL collects in the course of providing the CEIPAL Services. All such information is owned and controlled by our customers, who are the data controllers for such information with respect to data protection laws.

##### *How We Use the Personal Data Collected by CEIPAL’s Customers*

CEIPAL may use this information for various purposes for the benefit of its customers, including, but not

limited to, providing them with contracted CEIPAL Services.

*Access to Personal Data Controlled by CEIPAL's Customers*

CEIPAL has no direct relationship with the consumers whose Personal Data CEIPAL receives in the course of providing the CEIPAL Services to its customers. An individual consumer who seeks access, or who seeks to correct, amend, or delete inaccurate Personal Data should direct his query to CEIPAL's customer. If the customer then requests CEIPAL to correct, amend, or delete the data in CEIPAL's possession or control, we will respond to their request promptly.

*Retention of Personal Data*

CEIPAL will retain Personal Data we receive in the course of providing the CEIPAL Services to our customers for as long as (i) directed by the customers or otherwise agreed to with them, (ii) otherwise needed to provide the CEIPAL Services to the customers and (iii) as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

**B. Personal Data Collected from Visitors to Our Websites and through CEIPAL Sales, Marketing, and Support Activities**

We gather various types of Personal Data such as name, email address, company name, phone number, and device type from our users, as explained more fully below. We may use this Personal Data to personalize and improve our Site, to contact users, to fulfill your requests for certain products and services, to analyze how users utilize the Site, and as otherwise set forth in this Privacy Policy. We may share certain types of Personal Data with third parties (described in this Section and in Section 5 below).

The following chart details the categories of Personal Data that we collect and have collected over the past 12 months from visitors to our websites and through CEIPAL sales, marketing and customer support activities. For each category of Personal Data, these subsections also set out our commercial and business purpose for collecting that Personal Data and the categories of third parties with whom we share that Personal Data. More information regarding those sources and categories is set forth in the charts below. The chart in this section details the categories of Personal Data that we collect and have collected over the past 12 months:

<b><u>Category of Personal Data</u></b>	<b><u>Personal Data We Collect</u></b>	<b><u>Source(s) of Personal Data</u></b>	<b><u>Third Parties with Whom We Share this Personal Data for a Business Purpose:</u></b>
<b>Personal Identifiers</b>	<ul style="list-style-type: none"> <li>• First and last name</li> <li>• E-mail</li> <li>• Phone number</li> <li>• Mailing address</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Acquirors</li> <li>• Service Providers</li> <li>• Parties You authorize, access or authenticate.</li> </ul>
<b>Geolocation Information</b>	<ul style="list-style-type: none"> <li>• Zip code</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Acquirors</li> <li>• Service Providers</li> <li>• Parties You authorize, access or authenticate.</li> </ul>

<b>Employment Data</b>	<ul style="list-style-type: none"> <li>• Employer</li> <li>• Job Title</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Third Parties</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Parties You Authorize, Access or Authenticate</li> </ul>
<b>Other Identifying Information That You Voluntarily Choose to Provide</b>	<ul style="list-style-type: none"> <li>• Unique identifiers such as passwords</li> <li>• Personal Data in emails, calls or letters you send to us</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Parties You Authorize, Access or Authenticate</li> </ul>
<b>Device/IP Information</b>	<ul style="list-style-type: none"> <li>• IP Address</li> <li>• Device ID</li> <li>• Domain server</li> <li>• Type of device/operating system/browser used to access the Site</li> <li>• Log data</li> <li>• Access times</li> <li>• Hardware and software information</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Ad Partners</li> <li>• Parties You Authorize, Access or Authenticate</li> </ul>
<b>Web Analytics</b>	<ul style="list-style-type: none"> <li>• Web page interactions</li> <li>• Referring webpage/source through which you access the Site</li> <li>• Non-identifiable request IDs</li> <li>• Statistics associated with the interaction between device or browser and the Site</li> <li>• Usage information</li> <li>• Cookies and other tracking technologies (e.g., web beacons, pixel tags, SDKs)</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Third Parties</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Ad Partners</li> <li>• Parties You Authorize, Access or Authenticate</li> </ul>

### 3) Categories of Sources of Personal Data

#### Sources of Personal Data

We collect Personal Data about you from the following categories of sources:

- “You”
  - When you provide such information directly to us.
  - When Personal Data about you is automatically collected in connection with your use of our Site (see the subsection titled “Information Collected Automatically” below).
- “Third Parties”
  - Third parties that provide us with Personal Data about you. Third Parties that share your Personal Data with us include:
    - Service providers. For example, we may use analytics service providers to analyze how you interact and engage with the Site, or third parties may help us provide

you with customer support.

- Our business customers. If you share Personal Data with our business customers, they may share that information with us in order to chat or email with you through the Site and to store your information on the Site.
- Advertising partners. We receive information about you from some of our service providers who assist us with marketing or promotional services related to how you interact with our websites, applications, products, services, advertisements or communications.

### Cookies and other Information Collected Automatically

The Site use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, “Cookies”) to enable our servers to recognize your web browser and tell us how and when you visit and use our Site, to analyze trends, learn about our user base and operate and improve our Site. Cookies are small pieces of data— usually text files – placed on your computer, tablet, phone or similar device when you use that device to access our Site. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s). Please note that because of our use of Cookies, the Site does not support “Do Not Track” requests sent from a browser at this time.

We use the following types of Cookies:

- Essential Cookies. Essential Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Site. Disabling these Cookies may make certain features and services unavailable.
- Functional Cookies. Functional Cookies are used to record your choices and settings regarding our Site, maintain your preferences over time and recognize you when you return to our Site. These Cookies help us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- Performance/Analytical Cookies. Performance/Analytical Cookies allow us to understand how visitors use our Site such as by collecting information about the number of visitors to the Site, what pages visitors view on our Site and how long visitors are viewing pages on the Site. Performance/Analytical Cookies also help us measure the performance of our advertising campaigns in order to help us improve our campaigns and the Site’s content for those who engage with our advertising. For example, Google Inc. (“Google”) uses cookies in connection with its Google Analytics services. Google’s ability to use and share information collected by Google Analytics about your visits to the Site is subject to the Google Analytics Terms of Use and the Google Privacy Policy. You have the option to opt-out of Google’s use of Cookies by visiting the Google advertising opt-out page at [www.google.com/privacy\\_ads.html](http://www.google.com/privacy_ads.html) or the Google Analytics Opt-out Browser Add-on at <https://tools.google.com/dlpage/gaoptout/>.

You can decide whether or not to accept Cookies through your internet browser’s settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our Site and some of the functionalities may not work.

To explore what Cookie settings are available to you, look in the “preferences” or “options” section of

your browser's menu. To find out more information about Cookies, including information about how to manage and delete Cookies, please visit <http://www.allaboutcookies.org/> or <https://ico.org.uk/for-the-public/online/cookies/> if you are located in the European Union.

#### **4) How we use the Personal Data we Collect**

We process Personal Data to operate, improve, understand and personalize our Site. We may use Personal Data for the following purposes:

- To meet or fulfill the reason you provided the information to us.
- To communicate with you about the Site, including Service announcements, updates or offers.
- To provide support and assistance for the Site.
- To respond to user inquiries and fulfill user requests.
- To improve and develop the Site, including testing, research, analysis and product development.
- To protect against or deter fraudulent, illegal or harmful actions and maintain the safety, security and integrity of our Site.
- To comply with our legal or contractual obligations, resolve disputes, and enforce our Terms of Use.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- For any other business purpose stated when collecting your Personal Data or as otherwise set forth in applicable data privacy laws, such as the California Consumer Privacy Act (the "CCPA").

We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated, or incompatible purposes without providing you notice.

As noted in the list above, we may communicate with you if you've provided us the means to do so. For example, if you've given us your email address, we may send you promotional email offers or email you about your use of the Site. Also, we may receive a confirmation when you open an email from us, which helps us improve our Site. If you do not want to receive communications from us, please indicate your preference by emailing us at [compliance@ceipal.com](mailto:compliance@ceipal.com).

#### **5) With Whom Do We Share Your Personal Data for Business Purposes**

We disclose your Personal Data as indicated in the chart above to the following categories of service providers and other parties:

- "Service Providers"
  - These are third parties that help us provide our services through the Site, including, ad networks, security and fraud prevention providers, hosting and other technology and communications providers, analytics providers, and staff augmentation and contract personnel.
- "Acquirors"
  - These are parties who acquire your Personal Data through an acquisition or other change of control. Personal Data may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part).
- "Selected Recipients"
  - These are third parties that we share your Personal Data with at your direction,

- including:
- Third-party business partners who you access through the Site.
  - Other parties authorized by you

We may share your Personal Data to service providers and other parties for the following business purposes:

- Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity.
- Debugging to identify and repair errors that impair existing intended functionality.
- Short-term, transient use of Personal Data that is not used by another party to build a consumer profile or otherwise alter your consumer experience outside the current interaction.
- Performing services on our behalf, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, or providing similar services on behalf of the business or service provider.
- Undertaking internal research for technological development and demonstration.
- Undertaking activities to verify or maintain the quality or safety of a service or device that we own, manufacture (or that was manufactured for us) or control.

## **6) Data Security and Retention**

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, organizational and administrative security measures based on the type of Personal Data and how we are processing that data. We implement a variety of security measures to maintain the safety of your personal information when you submit a request, place an order or enter, submit, or access your personal information. These security measures include: password protected directories and databases to safeguard your information, SSL (Secure Sockets Layered) technology to ensure that your information is fully encrypted and sent across the Internet securely, and PCI Scanning to actively protect our servers from hackers and other vulnerabilities.

The Website may contain links to other sites. We are not responsible for the privacy policies and/or practices on other sites. When following a link to another site you should read that site's privacy policy.

We retain Personal Data about you for as long as you have an open account with us or as otherwise necessary to provide you with our Site. In some cases, we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. We may further retain information in an anonymous or aggregated form where that information would not identify you personally.

## **7) Personal Data of Children**

As noted in the Terms of Use, we do not knowingly collect or solicit Personal Data about children under 16 years of age; if you are a child under the age of 16, please do not attempt to register for or otherwise use the Site or send us any Personal Data. If we learn we have collected Personal Data from a child under 16 years of age, we will delete that information as quickly as possible. If you believe that a child under 16 years of age may have provided Personal Data to us, please contact us at

[compliance@ceipal.com](mailto:compliance@ceipal.com).

## **8) What Choices Do I Have?**

You can always opt not to disclose information to use, but keep in mind some information may be

needed to register with us or to take advantage of some of our special features.

You may be able to add, update, or delete information by emailing us at to [compliance@ceipal.com](mailto:compliance@ceipal.com). When you update information, however, we may maintain a copy of the unrevised information in our records. You may request deletion of your account via email to [compliance@ceipal.com](mailto:compliance@ceipal.com). Please note that some information may remain in our private records after your deletion of such information from your account if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. We may use any aggregated data derived from or incorporating your Personal Data after you update or delete it, but not in a manner that would identify you personally.

We collect information for our customers, if you have been contacted by one of our customers and would no longer like to be contacted by one of our customers through use of our service, please contact the customer that you interact with directly. CEIPAL will retain personal data we process on behalf of our customers for as long as needed to provide services to our customer. CEIPAL will retain and use this Personal Data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

If you do not wish to receive email or other mail from us, please contact us via email at [compliance@ceipal.com](mailto:compliance@ceipal.com) or follow the unsubscribe instructions in each promotional email. Please note that if you do not want to receive legal notices from us, such as this Privacy Policy, those legal notices will still govern your use of the Website, and you are responsible for reviewing such legal notices for changes.

If you are a resident of California or the European Union, you may have additional rights. Please see the **California Rights** and **EU Residents** sections below for more information.

#### **9) Changes to this Privacy Policy**

We may amend this Privacy Policy from time to time. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is used. If we make any material changes, we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this Site prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

#### **10) California Resident Rights**

If you are a California resident, you have the rights set forth in this section. Please see the “Exercising Your Rights” section below for instructions regarding how to exercise these rights. Please note that we may process Personal Data of our customers’ end users or employees in connection with our provision of certain services to our customers. If we are processing your Personal Data as a service provider, you should contact the entity that collected your Personal Data in the first instance to address your rights with respect to such data.

If there are any conflicts between this section and any other provision of this Privacy Policy and you are a California resident, the portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following rights apply to you, please contact us at [compliance@ceipal.com](mailto:compliance@ceipal.com).

#### **Access**

You have the right to request certain information about our collection and use of your Personal Data

over the past 12 months. In response, we will provide you with the following information:

- The categories of Personal Data that we have collected about you.
- The categories of sources from which that Personal Data was collected.
- The business or commercial purpose for collecting or selling your Personal Data.
- The categories of third parties with whom we have shared your Personal Data.
- The specific pieces of Personal Data that we have collected about you.

If we have disclosed your Personal Data to any third parties for a business purpose over the past 12 months, we will identify the categories of Personal Data shared with each category of third-party recipient. If we have sold your Personal Data over the past 12 months, we will identify the categories of Personal Data sold to each category of third-party recipient.

### Deletion

You have the right to request that we delete the Personal Data that we have collected about you. Under the CCPA, this right is subject to certain exceptions: for example, we may need to retain your Personal Data to provide you with the Site or complete a transaction or other action you have requested. If your deletion request is subject to one of these exceptions, we may deny your deletion request.

### Exercising Your Rights

To exercise the rights described above, you must send us a request that (1) provides sufficient information to allow us to verify that you are the person about whom we have collected Personal Data, and (2) describes your request in sufficient detail to allow us to understand, evaluate and respond to it. Each request that meets both of these criteria will be considered a "Valid Request." We may not respond to requests that do not meet these criteria. We will only use Personal Data provided in a Valid Request to verify your identity and complete your request. You do not need an account to submit a Valid Request.

We will work to respond to your Valid Request within 45 days of receipt. We will not charge you a fee for making a Valid Request unless your Valid Request(s) is excessive, repetitive or manifestly unfounded. If we determine that your Valid Request warrants a fee, we will notify you of the fee and explain that decision before completing your request.

You may submit a Valid Request using the following methods:

- Call us at: +1-585-326-1312
- Email us at: [compliance@ceipal.com](mailto:compliance@ceipal.com)

You may also authorize an agent (an "Authorized Agent") to exercise your rights on your behalf. To do this, you must provide your Authorized Agent with written permission to exercise your rights on your behalf, and we may request a copy of this written permission from your Authorized Agent when they make a request on your behalf.

### We Will Not Discriminate Against You for Exercising Your Rights Under the CCPA

We will not discriminate against you for exercising your rights under the CCPA. We will not deny you our goods or services, charge you different prices or rates, or provide you a lower quality of goods and services if you exercise your rights under the CCPA. However, we may offer different tiers of our Site as



allowed by applicable data privacy laws (including the CCPA) with varying prices, rates or levels of quality of the goods or services you receive related to the value of Personal Data that we receive from you.

### Other California Resident Rights

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of Personal Data to third parties for such third parties' direct marketing purposes; in order to submit such a request, please contact us at support-th@CEIPAL.com.

### **11) Nevada Resident Rights**

If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Data to third parties who intend to license or sell that Personal Data. You can exercise this right by contacting us at [compliance@ceipal.com](mailto:compliance@ceipal.com) with the subject line "Nevada Do Not Sell Request" and providing us with your name and the email address associated with your account. Please note that we do not currently sell your Personal Data as sales are defined in Nevada Revised Statutes Chapter 603A.

### **12) EU Residents**

If you are a resident of the European Union ("EU"), United Kingdom, Liechtenstein, Norway, or Iceland, you may have additional rights under the EU General Data Protection Regulation (the "GDPR") with respect to your Personal Data, as outlined below.

For this Section 12, we use the terms "Personal Data" and "processing" as they are defined in the GDPR, but "Personal Data" generally means information that can be used to individually identify a person, and "processing" generally covers actions that can be performed in connection with data such as collection, use, storage and disclosure. CEIPAL Corp. and its affiliates will be the controller of your Personal Data processed in connection with your use of the Site.

Where applicable, this Section 12 is intended to supplement, and not replace, the other provisions of the Privacy Policy. If there are any conflicts between this section and any other provision of this Privacy Policy, the policy or portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following applies to you, please contact us at [compliance@ceipal.com](mailto:compliance@ceipal.com). Note that we may also process Personal Data of our customers' end users or employees in connection with our provision of services to customers, in which case we are the processor of Personal Data. If we are the processor of your Personal Data (i.e., not the controller), please contact the controller party in the first instance to address your rights with respect to such data.

### *What Personal Data Do We Collect From You and How Do We Use It?*

Please refer to **Section 3 - What Information Does CEIPAL Collect?** and **Section 4 - How We Use the Personal Data We Collect** above for information about the Personal Data we collect about you and how we use it.

### *On What Basis Do We Justify Processing Your Personal Data*

We will only process your Personal Data if we have a lawful basis for doing so. Lawful bases for processing include consent, contractual necessity and our "legitimate interests" or the legitimate interest of others, as further described below, and depending on the Personal Data involved and the

specific context in which we collect it. CEIPAL's processing of your Personal Data is justified on one or more of the following legal bases:

*Performance of Contract:* The processing is necessary to perform a contract with you or take steps to enter into a contract at your request. When we process data due to contractual necessity, failure to provide such Personal Data will result in your inability to use some or all portions of the Site that require such data. Examples include: name, email address, address and phone number.

*Our Legitimate Interests:* The processing is in our legitimate interests, subject to your interests and fundamental rights, and notably our legitimate interest in using applicable data to conduct and develop our business activities, such as developing and maintaining relationships with our customers, our operation and improvement of our business, products and services, marketing of our products and services, provision of customer support, protection from fraud or security threats, compliance with legal obligations, and completion of corporate transactions. Examples include: name, email address, address, phone number, Content, and information about you that is automatically collected when you use the Site as detailed above.

*Compliance with Law:* The processing is necessary for us to comply with a relevant legal obligation;

*With Your Consent:* You have consented to the processing (for example, where we are required by local law to rely upon your prior consent for the purposes of direct marketing); or

*Defend Our Rights; Protect Vital Interests:* The processing is necessary to the establishment, exercise, or defense of legal claims or rights or to protect your vital interests or those of another person.

*How and With Whom Do We Share Your Data?*

Please refer to **Section 5 - With Whom Do We Share Your Personal Data for Business Purposes?** above for information about how and with whom we share your Personal Data.

*What Rights Do You Have Regarding Your Personal Data?*

You have certain rights with respect to your Personal Data, including those set forth below. For more information about these rights, or to submit a request, please email support-th@CEIPAL.com. Please note that in some circumstances, we may not be able to fully comply with your request, such as if it is frivolous or extremely impractical, if it jeopardizes the rights of others, or if it is not required by law, but in those circumstances, we will still respond to notify you of such a decision. In some cases, we may also need to you to provide us with additional information, which may include Personal Data, if necessary, to verify your identity and the nature of your request.

*Special Note Regarding Personal Data Processed by CEIPAL through the CEIPAL Services:* *If CEIPAL has collected or is otherwise processing your Personal Data through a CEIPAL's customer's use of the CEIPAL Services you should contact that customer in the first instance to address your rights with respect to the Personal Data.*

*Access:* You can request more information about the Personal Data we hold about you and request a copy of such Personal Data.

*Rectification:* If you believe that any Personal Data we are holding about you is incorrect or incomplete,

you can request that we correct or supplement such data.

*Erasure:* You can request that we erase some or all of your Personal Data from our systems.

*Withdrawal of Consent:* If we are processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have to then provide express consent on a case-by-case basis for the use or disclosure of certain of your Personal Data, if such use or disclosure is necessary to enable you to utilize some or all of our Site.

*Portability:* You can ask for a copy of your Personal Data in a machine-readable format. You can also request that we transmit the data to another controller where technically feasible.

*Objection:* You can contact us to let us know that you object to the further use or disclosure of your Personal Data for certain purposes, such as for direct marketing purposes.

*Restriction of Processing:* You can ask us to restrict further processing of your Personal Data.

*Right to File Complaint:* You have the right to lodge a complaint about CEIPAL's practices with respect to your Personal Data with the supervisory authority of your country or EU Member State.

#### *Transfers of Personal Data*

The Site is hosted and operated in the United States ("U.S.") through CEIPAL and its service providers, and if you do not reside in the U.S., laws in the U.S. may differ from the laws where you reside. By using the Site, you acknowledge that any Personal Data about you, regardless of whether provided by you or obtained from a third party, is being provided to CEIPAL in the U.S. and will be hosted on U.S. servers, and you authorize CEIPAL to transfer, store and process your information to and in the U.S., and possibly other countries. You hereby consent to the transfer of your data to the U.S. pursuant to another safeguard(s) for cross-border transfer: (i) a data processing agreement incorporating standard data protection clauses promulgated by the EC, a copy of which can be obtained at <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32010D0087>, (ii) binding corporate rules for data protection that align with the GDPR's requirements, or (iii) adherence to an industry- or technology-specific approved code of conduct blessed by the EC.

### **13) SMS Terms and Conditions**

Please read these SMS Terms and Conditions ("SMS Terms") carefully provided by "Ceipal Corp" (also known as: "Ceipal") and here referred to as either "the company", "We", "Us", or "Our". We may share text messages (SMS) with you regarding the status of services.

We may update our employees, job applicants and potential customers about various recruitment steps such as checking availability for specific job, coordinating job interviews, sending interview reminders, arranging skill tests or assessments, providing interview feedbacks, informing them of their selection for specific job opportunities, sharing information about employee benefits and packages, coordinating onboarding process, coordinating background checks, coordinating HR documentation, coordinating references verification, coordinating for pre-employment requirements, equipment related follow-ups (laptop or computer system), coordinating training, coordinating compliance and audit reports, notifications on salary and leave, periodic timesheets and salary-related queries, post-employment

benefits, project status updates, purchasing goods and services, resolving order processing issues, technical issues, billing issues, conducting surveys or gathering feedback ,and offering customer support, invitations to our subscribers to attend our business / technical presentations.

You can unsubscribe to the SMS at any time by responding with “STOP” to the text message (SMS) you may have received, text “HELP” to +1 585-326-1312 for assistance and “JOIN” to rejoin or opt-in to receive text messages (SMS) from us.

Text messages (SMS) and data rates may be applicable based on your carrier, you can contact your phone service provider to get advice regarding SMS or data plan. The message (SMS) frequency varies based on the status of services; Carriers are not liable for the delayed or undelivered messages.

We may update, modify, or amend these SMS Terms and Conditions at any time. Any revisions or changes will be effective at any time without any notice. You agree to periodically review these (Company’s) Privacy Policy and Terms and Conditions to ensure that you are aware of any changes. Continuing to receive messages (SMS) from us will indicate your acceptance of these changes.

By admitting the SMS Terms and Conditions, you agree to be bound by the content of the SMS.

#### **14) Questions or Concerns**

If you have any questions or concerns regarding our privacy policies, please send us a detailed message to [compliance@ceipal.com](mailto:compliance@ceipal.com) or CEIPAL, Attn. Privacy Policy 687 Lee Road, Suite 208A, Rochester, NY 14606. We will make every effort to resolve your concerns.