

PRIVACY POLICY

Effective Date: June 21, 2019

Your privacy is important to us and maintaining your trust is our priority.

ZipRecruiter, Inc. ("ZipRecruiter," "we," or "us"), respects your privacy and is committed to protecting it through our compliance with this Privacy Policy.

This Privacy Policy describes the types of information we may collect from you or that you may provide when you visit one of the websites listed below, and our practices for collecting, using, maintaining, protecting, and disclosing that information.

The websites covered by this Privacy Policy are: www.ziprecruiter.co.uk, www.ziprecruiter.com, www.ziprecruiter.de, www.zipalerts.com and our Mobile Applications (collectively, the "Website").

This Privacy Policy applies to data we collect:

- On this Website.
- In email, text, and other electronic messages between you and this Website.
- Through mobile and desktop applications you download from this Website, which provide dedicated non-browser-based interaction between you and this Website.
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this Privacy Policy.

You may have different privacy rights under applicable laws depending on the country you are in when you visit or access our Website.

[EU-U.S. Privacy Shield and Swiss-U.S. Privacy Shield](#)

We are committed to upholding the Privacy Shield Principles

ZipRecruiter participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework. ZipRecruiter is committed to subjecting all personal data received from European Union (EU) member countries and Switzerland, respectively, in reliance on each Privacy Shield Framework, to the Framework's applicable Principles. To learn more about the Privacy Shield Frameworks, and to view our certification, visit the U.S. Department of Commerce's Privacy Shield List. <https://www.privacyshield.gov/list>.

ZipRecruiter is responsible for the processing of personal data it receives, under each Privacy Shield Framework, and subsequently transfers to a third party acting as an agent on its behalf. ZipRecruiter complies with the Privacy Shield Principles for all onward transfers of personal data from the EU and Switzerland, including the onward transfer liability provisions.

With respect to personal data received or transferred pursuant to the Privacy Shield Frameworks, ZipRecruiter is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, ZipRecruiter may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

Under certain conditions, more fully described on the [Privacy Shield website](#), you may be entitled to invoke binding arbitration when other dispute resolution procedures have been exhausted.

Capitalized terms that are not defined in this Privacy Policy have the meaning given to them in our [Terms of Use](#) or in any other contractual document between you and us.

This Privacy Policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy [here](#).

CLICK ON THE LINKS BELOW TO JUMP TO EACH SECTION:

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1. WHO WE ARE

The Website is owned and operated by ZipRecruiter, Inc. ("ZipRecruiter"), which provides an online job board that connects employers to job seekers.

ZipRecruiter Inc.
604 Arizona Avenue, Santa Monica, California 90401, USA
Delaware corporation (File Number 4829724)

Pursuant to Article 27 of Europe's General Data Protection Regulation (GDPR), we have appointed a representative in the UK to act as our GDPR representative in the EU where required ("GDPR Representative"). You can contact our GDPR Representative by sending an email to art27rep@ziprecruiter.com, or by writing to our GDPR Representative at:

ZipRecruiter UK Ltd.
c/or Fieldfisher LLP
Registered Office: Riverbank House, 2 Swan Lane, London, EC4R 3TT, UK
ATTN: Privacy Department

For more information on the transfer of personal data outside the European Economic Area (EEA), please see Section 7 below.

2. KEY TERMS

It would be helpful to start by explaining some key terms used in this Privacy Policy:

The Ziprecruiter Group	This means ZipRecruiter Inc. and its wholly-owned subsidiaries, ZipRecruiter UK Ltd. and ZipRecruiter Israel Ltd.
Non-Personal Data	"Non-Personal Data" means data that is not considered Personal Data under applicable law. We reserve the right to treat data as Personal Data or Non-Personal Data based on the law applicable to the data and the data subject.
Personal Data	"Personal data" means any information or pieces of information that could identify you either directly (e.g., your name) or, where required by applicable law indirectly (e.g., through pseudonymised data, such as a unique ID number). This means that Personal Data includes things like email/home addresses, usernames, user generated content, financial information, and health information. It could also include certain Technical Data (defined below) such as unique numerical identifiers like your computer's IP address or your mobile device's MAC address, as well as cookies (" <u>Device IDs</u> "), where required by applicable law
Special Categories of Personal Data	This refers to sensitive Personal Data that reveals racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership; Genetic and biometric data; and Data concerning health, sex life or sexual orientation.
EEA	European Economic Area.

3. DATA WE COLLECT ABOUT YOU

Personal Data

As permitted by applicable law in the country from which you access our Website and use our services, we may collect, use, store and transfer different kinds of Personal Data about you. We have grouped these into the following categories of Personal Data:

- **“Identity Data”** such as first name, maiden name, last name, resume/CV, Social Media profile, username or similar identifier.
- **“Contact Data”** such as billing addresses, email addresses and telephone numbers.
- **“Financial Data”** such as payment card details. However, please note that payment methods (e.g., credit card number and/or PayPal and/or bank account details) are not collected by us directly, but by secure payment service providers.
- **“Transaction Data”** such as details about payments to and from you, and details regarding the services that you have subscribed to in relation to this Website.
- **“Technical Data”** such as Device IDs, your login data, access dates and times, browser type and version, device information, cookie data, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Website.
- **“Profile Data”** such as your username and password, orders made by you, preferences, user-generated content, job searches, candidate searches, job applications, feedback and survey responses.
- **“Usage Data”** such as information about how you use our Website, products and services.
- **“Marketing and Communications Data”** such as your preferences in receiving marketing from us and our third-parties and your communication preferences.

Non-Personal Data

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your Personal Data but is not considered Personal Data since it does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

If You Fail to Provide Personal Data Where Required to Provide Services to You

Where we need to collect Personal Data by law, or under the terms of a contract we have with you, or a prospective contract, and you fail to provide that Personal Data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our services). If so, we may have to cancel the service you have with us (or have requested from us), and you accept that as a condition of service.

Data That You Should Not Provide to Us

We do not require any **Special Categories of Personal Data** about you. Accordingly, please do not provide this type of personal data to us.

ZipRecruiter as a Data Processor

ZipRecruiter acknowledges that you have the right to access your personal information. With respect to Personal Data provided by a client of ZipRecruiter to ZipRecruiter, we collect such information under the direction of that client and have no direct relationship with the individuals whose Personal Data we process. If you are a customer of such a ZipRecruiter client and would no longer like to be serviced by such client, please contact the client directly. If you seek access or want to correct, amend, or delete inaccurate data, you must direct such request to that client (the data controller). If requested to remove data, we will respond within a reasonable timeframe. We may transfer personal information to companies that help us provide our services. Transfers to subsequent third

parties are covered by our service agreements with our clients.

We will retain Personal Data that we process on behalf of our clients for as long as needed to provide services to our client. ZipRecruiter will retain this Personal Data as necessary to comply with our legal obligations, resolve disputes, enforce our agreements, and in accordance with our internal record keeping policies.

4. HOW DATA IS COLLECTED

We use different methods to collect Personal Data from and about you including, for example:

Direct Interaction

You may give us your identity, contact, billing and other information by filling in forms or by corresponding with us by post, phone, e-mail or otherwise. This includes Personal Data you provide when you:

- sign-up for a free trial
- sign-up for a paid subscription
- create an account on our Website
- request information to be sent to you
- submit your CV/resume to our resume database
- give us some feedback
- apply to a job posted on our Website
- authorize ZipRecruiter to connect your account to the account of a "**Connected Site**" (e.g., LinkedIn, Monster, Facebook or Twitter), we may be able to access information you have provided to the Connected Site, such as content information, timeline feeds, contact and follow lists, network statistics and updates regarding your Connected Site account

Automated Technologies or Interactions. As you interact with our Website, we may automatically collect Technical Data and Usage Data about your equipment, browsing actions and patterns. We collect this Personal Data and Non-Personal Data by using cookies, server logs and other similar technologies. We may also receive Technical Data and Usage Data about you if you visit other websites employing our cookies and other Tracking Technologies (defined below). For more information regarding our use of Tracking Technologies, please refer to "Cookies and Similar Technologies" below.

Third Parties. We may receive Personal Data in the form of Technical Data and Usage Data about you from various third-parties such as analytics providers or advertising networks.

5. HOW WE USE YOUR DATA

Non-Personal Data

Where permitted by applicable law, we may use your Non-Personal Data for any purpose not prohibited by applicable law or inconsistent with this Privacy Policy or any written representation we have made to you at the point and time of the data collection.

Personal Data

We will only use your Personal Data where permitted by law. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interest
- Where we need to comply with a legal obligation
- Where you have given us your consent

Purposes for Which We Use Your Personal Data

In the table below, we have described (i) in what context your personal data was collected, i.e., what activity you were involved in when we collected or used your personal data; (ii) the types of personal data that we hold about you; (iii) how and why we use your personal data; and (iv) what our legal basis is for using your personal data. We will amend the table as required. We have also identified what our legitimate interests are where appropriate. We have also provided you with an explanation of some of the terms we use in this table:

- (a) **‘Legitimate Interest’** means our interest in conducting and managing our business, to enable us to give you the best experience when using the Website, products, and services. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- (b) **‘Performance of Contract’** means processing your Personal Data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- (c) **‘Comply with a legal or regulatory obligation’** means processing your Personal Data where it is necessary for compliance with a legal or regulatory obligation to which we are subject.
- (d) **‘Consent’** means that you consent to our use of your personal data for one or more specific purposes. Where we rely on your consent to use your personal data, you have the right to withdraw that consent at any time. You can do this by contacting us at dsars@ziprecruiter.com. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

CONTEXT IN WHICH YOUR PERSONAL DATA IS COLLECTED	WHAT PERSONAL DATA WE MAY HOLD ABOUT YOU	HOW WE MAY USE YOUR PERSONAL DATA	OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA
Account Creation and Management	<ul style="list-style-type: none">• Identity• Contact• Billing• Financial• Technical• Transaction	<ul style="list-style-type: none">• To create and manage your account• To communicate with you about your account and process your order• To manage our relationship	<ul style="list-style-type: none">• To perform our contract with you so you can use create your account and use our Services• For our legitimate interests to (i) improve

CONTEXT IN WHICH YOUR PERSONAL DATA IS COLLECTED	WHAT PERSONAL DATA WE MAY HOLD ABOUT YOU	HOW WE MAY USE YOUR PERSONAL DATA	OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA
	<ul style="list-style-type: none"> • Profile • Other information you have shared with us about yourself (e.g. via your “My Account” page), by contacting us, or a question via the chat function 	<p>with you</p> <ul style="list-style-type: none"> • To offer you personalized services based on your preferences • To respond to your questions • To send you email job alerts if you registered to receive job alerts • To send you marketing communications (where you have asked us to) which may be tailored to your “profile” (i.e. based on the personal data we know about you and your preferences) • To manage payments, fees and charges. Please note that payment methods (e.g., credit card number and/or PayPal and/or bank account details) are not collected by us directly, but by secure payment service providers • To collect monies owed to us • To run analytics or collect statistics • To manage any surveys, promotions or competitions you entered • To communicate with you regarding our services 	<p>our Services; (ii) better engage with you; (iii) prevent fraud; and (iv) secure our tools</p> <ul style="list-style-type: none"> • Consent – so you can receive job alert emails or marketing communications
Newsletter and Marketing Communications	<ul style="list-style-type: none"> • Identity • Contact • Profile Data • Marketing and Communications Data • Other information you have shared with us about yourself (e.g. via your “My Account” page), by contacting us, or a question via the chat function 	<ul style="list-style-type: none"> • To send you marketing communications (where you have asked us to) which may be tailored to your “profile” based on the personal data we know or learn about you and your preferences; • To send you newsletter where you have indicated an interest or shown an interest based on your preferences as shown by your activity on the Website and/or your profile • To keep your Contact data on a suppression list if you’ve indicated you don’t want to be communicated in a particular way • To run analytics or collect statistics 	<ul style="list-style-type: none"> • For our legitimate interests to (i) improve our Services; (ii) better engage with you; (iii) prevent fraud; and (iv) secure our tools • Consent – so you can receive newsletters, and information about products and services that may be of interest to you
Purchases, Subscriptions and Order	<ul style="list-style-type: none"> • Identity • Contact • Billing • Financial 	<ul style="list-style-type: none"> • To process your order for a subscription or other products and services • To manage payment. Please 	<ul style="list-style-type: none"> • The performance of a contract – so you can make purchase and we can manage the associated

CONTEXT IN WHICH YOUR PERSONAL DATA IS COLLECTED	WHAT PERSONAL DATA WE MAY HOLD ABOUT YOU	HOW WE MAY USE YOUR PERSONAL DATA	OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA
Management	<ul style="list-style-type: none"> • Technical • Transaction • Profile • Other information you have shared with us about yourself (e.g. via your “My Account” page), by contacting us, or a question via the chat function 	<p>note that your payment information (credit card number/PayPal/bank account details) are not collected by us directly, but by secure payment service providers</p> <ul style="list-style-type: none"> • To communicate with you regarding your subscription • To secure your transaction against fraud. We may use a third-party provider’s solution to detect fraud and make sure that payment is completed • To update your transaction history in your account profile • To perform invoicing, debt collections, or manage payment disputes or issues with the services • To run analytics or collect statistics. 	<p>logistics</p> <ul style="list-style-type: none"> • Our legitimate interests: (i) to improve our products and services; (ii) better engage with you; (iii) prevent fraud; and (iv) secure our tools • To comply with a legal obligation – to keep information we are required to, e.g., to comply with our tax and financial reporting obligations with respect to monies you have paid us
Website Administration	<ul style="list-style-type: none"> • Identity • Contact • Technical 	<ul style="list-style-type: none"> • To provide administration and IT services, network security, to prevent fraud • To troubleshoot • To perform data analysis, testing, system maintenance, support, reporting and hosting of data • To run analytics or collect statistics • To monitor and improve our website 	<ul style="list-style-type: none"> • For our legitimate interests to running our business • To perform our contract with you and provide services to you
Use of Website/apps and Devices	<ul style="list-style-type: none"> • Identity • Contact • Usage • Profile • Technical • Transaction 	<ul style="list-style-type: none"> • To provide you with the service(s) you requested such as sending your job application, sending you resumes, posting your job ad, providing you with products that you’ve requested, notifying you when your resume has been viewed • To analyse your preferences and tailor content • To monitor and improve our apps and devices • To run analytics and statistics. 	<ul style="list-style-type: none"> • Consent – to provide you with the service you have requested, for example, show you recommended products or complete your purchase • Our legitimate interests: (i) to improve our products and services; (ii) better engage with you; and (iii) secure our tools.
Online Browsing Where your Personal Data may be collected by cookies or similar technologies and data analytics	<ul style="list-style-type: none"> • Usage Data such as where you came from; login details; pages you looked at; duration of your visit; specifics of the services and products you purchased; jobs that you applied to; 	<ul style="list-style-type: none"> • To improve our Website, products/services and your user experience • To run analytics and collect statistics • To enable our Website to function properly (ensure 	<ul style="list-style-type: none"> • For our legitimate interests to (i) improve our Services and Website; (ii) to provide you with a better user experience so you can optimize the use of our Services

CONTEXT IN WHICH YOUR PERSONAL DATA IS COLLECTED	WHAT PERSONAL DATA WE MAY HOLD ABOUT YOU	HOW WE MAY USE YOUR PERSONAL DATA	OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA
	<p>jobs that you opened; candidate resumes that you viewed; type of jobs you posted; location of jobs</p> <ul style="list-style-type: none"> • Technical Data such as your IP address; browser information; device information; and/or your unique ID and the expiration date of the ID • Identity • Transaction • Profile 	<p>proper display of content); create and remember your account login details; interface personalization, such as language, or any user-interface customization (i.e. parameters attached to your device including your screen resolution or font preference), etc.</p> <ul style="list-style-type: none"> • To understand how you arrived at our Website • We use information derived from cookies together with other personal data that you have already shared with us to deliver you information about employment opportunities that may interest you based on the job searches you made on the Website, jobs you applied to or email alerts you signed up for; candidates that may interest you based upon the job ad you posted; the resumes/CVs you viewed • To customize our Services for you based upon your activity on the Website, your preferences for certain skillsets or certain jobs • To ensure the proper display of content; to remember your preferences, login and account details, and to improve our websites/apps, for example, by testing new ideas, features, layouts • To ensure our websites/apps are secure and safe, and to protect you against fraud or misuse of our websites/apps or services • To run data analytics and collect statistics 	<ul style="list-style-type: none"> • Consent, when required, to store cookies on your device
<p>Promotions Where your personal data was collected during a promotion, contest survey or feedback</p>	<ul style="list-style-type: none"> • Identity • Contact • Technical • Usage • Profile 	<ul style="list-style-type: none"> • To receive your contest entry, manage your participation in the promotion, take account of your feedback • To run analytics and statistics; • To send you candidates, jobs or information and products and services that may interest you based on your feedback and suggestions 	<ul style="list-style-type: none"> • The performance of a contract – so you may enter into the promotion, receive a prize, participate in a survey, send feedback • Our legitimate interests: (i) to improve our products and services; and (ii) better engage with you.

CONTEXT IN WHICH YOUR PERSONAL DATA IS COLLECTED	WHAT PERSONAL DATA WE MAY HOLD ABOUT YOU	HOW WE MAY USE YOUR PERSONAL DATA	OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA
<p>User-Generated Content Such as resumes/CVs, job ads, ratings</p>	<ul style="list-style-type: none"> • Identity • Contact • Usage • Profile 	<ul style="list-style-type: none"> • To send your resume to the employer whose job ad you applied to or to send you resumes of candidates that appear to have the skill set in your job ad; to add your resume/CV to the resume database • To run analytics and statistics • To add the resumes you've viewed or the jobs that you've applied to your account and profile; add your resume to the database if you've opted-in 	<ul style="list-style-type: none"> • Consent – to provide you with the Services you have requested, as employment role that fit your skill set or candidates that may interest you based on your job ad • Our legitimate interests: (i) to improve our products and services; (ii) better engage with you; and (iii) secure our tools and design new features.
<p>Enquiries and Messaging Where your personal data is collected when you ask questions relating to our services and/or your account</p>	<ul style="list-style-type: none"> • Identity • Contact • Profile • Transaction • Technical • Usage such as content of chats, messages, or enquiries; number of messages you've sent and received; when you viewed a message; who responded to your chats 	<ul style="list-style-type: none"> • To answer and manage your enquiries • To run analytics and statistics • To add your questions or concerns to your profile so we can understand your interests and preferences • To troubleshoot any problems that you are experiencing • We also may use automatic scanning technology on messages to allow us to recognize patterns on our messaging platform to make your professional communications more efficient and informed and contribute to a safer and more secure job search experience or check links shared in messages for malicious sites and looks for blacklisted keywords to detect spam and fraud. 	<ul style="list-style-type: none"> • Performance of our contract with you • Our legitimate interests: (i) to better engage with you; (ii) to enter into a contract with you; to secure our tools • Where we need to comply with a legal or regulatory obligation (data subject access rights)

6. WHO WE SHARE YOUR DATA WITH

We require all third-parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Personal Data

We may share Personal Data with the following parties:

Internal Parties

- Companies within our corporate family that comprise the ZipRecruiter Group. Access to your Personal Data will be controlled and only granted where necessary to provide our services to you and/or to allow us to perform any necessary or legitimate functions.

External Third-Parties

- Service providers that we use to support our business and help provide our services to you, including, but not limited to, third-parties that host our Website, assist us to verify your identity, perform website and platform maintenance, risk assessments, and security, perform data and web analytics, provide databases, IT services, customer service, payment platforms and credit card processing, communication services, and email services
- Professional advisers such as lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance, financial, auditing, and accounting services to us so we can operate our business
- Taxing authorities, such as the Internal Revenue Service and other authorities acting as processors based in the United States, the United Kingdom and other applicable countries, who require reporting of processing activities in certain circumstances
- Fraud prevention and identity verification services where we believe that disclosure is necessary or appropriate to protect the rights, property, or safety of ZipRecruiter, our customers or others. This includes exchanging information with third-parties for the purposes of fraud detection and prevention and credit risk reduction
- In connection with or during negotiations of any proposed or actual financing, merger, purchase, sale, sale or transfer of some or all of our assets or stock, joint venture, or any other type of financing, acquisition or business combination of our company(ies), or all or any portion of our assets, or transfer of all or a portion of our business to another company, including without limitation in the event of a divestiture, restructuring, reorganization, dissolution or other event, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding. In the event of a merger, divestiture, restructuring, reorganization, or other sale or transfer of some or all of our assets or stock, Personal Data that we hold about our clients and users of our services will be one of the assets that will be transferred. If a change happens to our business, the new owners may use your personal data in the same way as set out in this Privacy Policy
- Third-parties where you have expressly consented to the disclosure of your Personal Data
- Law enforcement agencies, courts, supervisory authorities, regulatory bodies and certain other third-parties, to the extent that we are permitted or required to do so by law, or in order to comply with our legal and regulatory obligations, or in the interests of national security, or to respond to verified requests relating to a criminal investigation or alleged or suspected illegal activity
- To enforce our [Terms of Use](#) and other agreements with you, to respond to, and defend ourselves against, claims asserted against us, to protect the rights, property, or safety of ZipRecruiter, our services, customers or others, or to investigate, prevent, or take action regarding suspected or actual illegal activities or for debt collection
- If you are a job seeker, we will share your personal data with prospective employers if you respond to a job advertisement or have opted-in to our Resume Database. Note: to the extent that you have an account with ZipRecruiter, please ensure that the resume associated with your account is up-to-date so when you apply for a job on a ZipRecruiter website, the employer receives your most recent resume. You will have an account with ZipRecruiter if

you opened an account yourself, signed up for job alerts, submitted your resume to the resume database, and/or applied for a job on the ZipRecruiter website. You can delete and upload new resumes by going to the 'Profile' settings in your account. You can opt-out of your information being available in our Resume Database at any time by updating this preference on the My Profile tab of your Job Seeker account.

- Upon your authorization, the Services may also post information directly to the timeline of your Connected Site Account
- With prospective employers and recruiters (and/or with their external Applicant Tracking System or similar external system used by such companies to manage responses to their job postings), if you respond to a job posting
- From time to time, we may run contests, special offers, or other events or activities ("*Events*") on our Services together with a third-party partner. If you provide information to such third parties, you give them permission to use it for the purpose of that Event and any other use that you approve. We cannot control third parties' use of your information. If you do not want your information to be collected by or shared with a third party, you can choose not to participate in these Events
- For any other purpose disclosed by us when you provide the information or with your consent

Non-Personal Data

Where permitted by applicable law, we may share your Non-Personal Data for any purpose not prohibited by applicable law or inconsistent with this Privacy Policy or any written representation we have made to you at the point and time of the data collection.

7. WHERE YOUR DATA IS TRANSFERRED

ZipRecruiter Inc. is headquartered in the United States of America (USA). The information that you provide or that we collect as a result of your interaction with the Website and/or your use of our services on the Website is transferred to the USA and/or to another country where we have a subsidiary or where we have engaged service providers. Some countries that are not located within the EU may be recognized by the European Commission as providing an adequate level of data protection. For transfers from the EU to countries not considered as adequate by the European Commission, we have put in place measures, including by ensuring that the recipient is bound by EU Standard Contractual Clauses, to protect your Personal Data. When we transfer Personal Data from the EU or Switzerland to the USA, we also rely on the EU-U.S. or Swiss-U.S. Privacy Shield Frameworks ("Privacy Shield"), and in making such transfers, we adhere to the Privacy Shield Principles, as described in our Privacy Shield certification, which you can find at <https://www.privacyshield.gov/participant?id=a2zt0000000TNnuAAG&status=Active>

8. HOW LONG YOUR DATA WILL BE KEPT

We will not retain your Personal Data for longer than necessary for the purposes set out in this Privacy Policy. Different retention periods apply for different types of Personal Data and in determining the appropriate retention period, we consider several criteria, including, but not limited to, the purpose for which we hold your Personal Data, our legal, accounting, reporting and/or regulatory obligations in relation to that Personal Data, e.g., financial or tax reporting obligations, whether our relationship with you is ongoing, e.g., where you use more than one of our products and/or services, any specific request you may have made in relation to the deletion of your Personal Data, or where we have a legitimate interest in relation to the management of our own rights, e.g.,

the defence of any claims. In some circumstances we may anonymize your Personal Data so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you no longer have a relationship with us, we will retain and securely destroy your Personal Data subject to the foregoing and in accordance with applicable laws and regulations. If you request to receive no further contact from us, we will keep some basic information about you on our suppression list in order to avoid sending you unwanted materials in the future.

9. YOUR DATA SUBJECT ACCESS RIGHTS (for data subjects in the EEA)

Data subjects in the EEA have the following rights with respect to their Personal Data:

YOUR RIGHTS	WHAT CAN YOU REQUEST
Right to Information	The right to know what Personal Data we hold about you and how we use it.
Right to Access	The right to be provided with a copy of your Personal Data (subject to certain restrictions).
Right of Rectification	The right to require us to correct any incomplete or inaccurate Personal Data we hold about you, though we may need to verify the accuracy of the new data you provide to us. If you have a user account with us, you also have the option of correcting your information directly in your account.
Right to erasure/be forgotten	This enables you to ask us to delete or remove Personal Data where there is no good reason for us to continue to process it. Note, however, that we may not always be able to comply with your request for erasure and in such circumstances, will notify our reasons to you.
Right to restrict processing	The right to require us to restrict processing of your Personal Data, i.e., you can request that we suspend the processing of your Personal Data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
Right to request data portability	In certain circumstances, you have the right to request the transfer of your Personal Data to you or to a third party in a commonly used machine-readable format. Note, however, that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
Right to object to processing	You have the right to object to the processing of your Personal Data in the following circumstances: (i) at any time to your Personal Data being processed for direct marketing (including profiling); or (ii) in certain other situations, to our continued processing of your Personal Data, e.g., our processing of your Personal Data when such processing is based on our legitimate interests. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
Right to withdraw consent at any time	You have the right to withdraw your consent at any time where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
Right not to be subject to a decision based solely on automated decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you. However, your right does not apply if: (i) you gave us your explicit consent to use your personal data to make our decision; (ii) we are allowed by law to make our decision; or (iii) our automated decision was necessary to enable us to enter into a contract with you.

California residents may have additional personal information rights and choices. Please see [California Privacy Rights](#) for more information.

Method for Requesting Information Pursuant to Your Rights

Upon request, ZipRecruiter will provide you with information about whether we hold any of your personal information. If you would like to exercise any of the data subject access rights in the table above (each, an “[Access Request](#)”) please send an email to dsars@ziprecruiter.com, and we will send you a Data Subject Access Request Form. We will respond to your request within a reasonable timeframe.

No Fee Usually Required

You will not usually be required to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What We May Need from You

Once we receive your Access Request, we may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it.

If we are not clear as to what you are requesting, we may also need to contact you for clarification so we can more fully respond to your request.

If we cannot locate any records about you, we may also ask you for additional information to assist us in locating records, if they exist.

Time Limit to Respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. COOKIES & TRACKING TECHNOLOGIES

ZipRecruiter and third parties may use cookies or similar tracking technologies (e.g., pixels, beacons, scripts, etc.) (“[Tracking Technologies](#)”) to analyze trends, administer the website, track users’ movements around the website, and to gather demographic information about our user base as a whole. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our website or service. For more information about the types of cookies and Tracking Technologies that we, and certain third parties use, and why we use them, and how you can control these, please review our policy regarding [Cookie Policy](#).

If you are accessing the Website from other than the EEA, you understand that we apply U.S. law and the U.S. advertising industry self-regulatory program to Tracking Technologies associated with the Website.

We partner with a third party to either display advertising on our websites or to manage our advertising on other sites. Our third party partner may use cookies or similar technologies in order to provide you advertising based upon your browsing activities and interests. If you wish to opt out

of any interest-based advertising click [here](#) or if located in the European Union click [here](#). Please note that you will continue to receive generic ads.

We use mobile analytics software to allow us to better understand the functionality of our Mobile Software on your phone. This software may record information such as how often you use the application, the events that occur within the application, aggregated usage, performance data and where the application was downloaded from.

To the extent permitted by applicable law, we may send you push notifications from time-to-time in order to update you about any events or promotions that we may be running. If you no longer wish to receive these types of communications, you may turn them off at the device level. To ensure you receive proper notifications, we will need to collect certain information about your device such as operating system and user identification information.

11. DATA SECURITY

We use appropriate technical and organizational measures to protect Personal Data we process about you.

However, no transmission of information via the Internet or wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your Personal Data, you acknowledge that there are security and privacy limitations of the Internet which are beyond our control and accordingly, the security, integrity and privacy of data exchanged between you and us through the Website cannot be guaranteed.

We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

The safety and security of your Personal Data also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your login or account credentials with anyone and keep your account information secure. We urge you to be careful about giving out information in public areas of the Website like message boards, where information will be available to other users of the Website. If you believe that your access credentials or Personal Data have been compromised, please contact us immediately.

12. LINKS TO THIRD PARTY WEBSITES AND SOCIAL MEDIA FEATURES

Our Website may from time to time, contain links to third-party services such as websites, locations, platforms, applications or services operated by third parties. If you follow a link to or otherwise access any of these third-party services, these third-party services may use their own cookies, web beacons, and other Tracking Technology to independently collect information about you and may solicit Personal Data from you. Please note that these third-party services have their own privacy policies and we do not accept any responsibility or liability for these parties' policies or practices. Please check these policies before you share any Personal Data with these third-party services.

We may offer you the opportunity to use your social media login when interacting with our Website. If you do so, please be aware that you may be sharing your profile information with us. The personal data that is shared will depend on your social media platform settings. Please visit the relevant social media platform and review its privacy policy to understand how your personal data is shared and used in this context.

Social media features may also collect your IP address, which page you are visiting on our Website, and may set a cookie or other Tracking Technologies to enable the applicable social media feature to

function properly. Your interactions with these features are governed by the privacy policy of the company providing such features.

The Website may include tools provided by us or third-party services that enable you to send a message to another person. If you use any such tools, please ensure that you only send messages to persons to whom you have permission to send messages. Absent the recipient's consent, we will only use their Personal Data that you provide us to facilitate such messages.

13. CALIFORNIA PRIVACY RIGHTS

California residents have the right to request certain information regarding our disclosure of personal information (as defined by the California Shine the Light Act) to third parties for their direct marketing purposes unless we provide them with an ability to exercise choice regarding such disclosures. We comply with this law by providing California residents with the ability to opt-out of, or prospectively withdraw their consent, if they have previously opted-in to, the disclosure of personal information to third parties for their direct marketing purposes. If you are a California resident, to receive confirmation of how we comply with this law, or to make a request or to opt out at any time, please contact us at privacy@ziprecruiter.com or mail us at the address provided in Section 20 below. Any request must include "*California Privacy Rights Request*" in the first line of the description and must include the requestor's name, street address, city, state, and ZIP code.

14. PUBLIC FORUMS

You should be aware that when you voluntarily disclose any Personal Data in a public forum on the Website, this information, along with any information disclosed in your communication, can be collected and used by third parties and may result in unsolicited messages from third parties. Such activities are beyond our control and this Privacy Policy does not apply to such information. You accept that you, and not ZipRecruiter, are responsible for providing such information in any public forum. Any submissions to public areas on the Website are accepted by you with the understanding that such forums are accessible to all third parties. If you do not want your comments or any content to be viewed by third parties, you are advised not to make any submissions. Please be careful and responsible whenever you're online.

15. INVITATION SERVICE

If you choose to use our invitation service to invite a friend to our Services, we provide you with a link to copy and paste to share with your friends, or spread the word on LinkedIn, Facebook or Twitter. We provide you with a unique link ID so that you earn credit for each friend that joins the site by following your link. Your friend may contact us to request that we remove this information from our database at privacy@ziprecruiter.com

If you wish to invite a friend to view our blog posts, we will ask you for that person's email address and automatically send an email invitation. ZipRecruiter stores this information to send this email, to register your friend if your invitation is accepted, and to track the success of our invitation service. Your friend may contact us to request that we remove this information from our database at privacy@ziprecruiter.com.

16. QUESTIONS OR COMPLAINTS

Data Subjects Located Outside the European Economic Area and Switzerland

If you have a complaint, or if you have any questions or requests regarding your Personal Data, please email us at dsars@ziprecruiter.com, and specify the country in which you are located.

Data Subjects Located within the European Economic Area & Switzerland

If you have a complaint, or if you have questions or requests regarding your Personal Data, please email us at dsars@ziprecruiter.com, and specify the country in which you are located. If we are not able to address your concern and you are a resident of the EU, you have the right to lodge a complaint with the Data Protection Authority where you are located or where the issue took place. For contact details of your local Data Protection Authority, please see www.ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm. Contact information for the Information Commissioner's Office (ICO), which is the supervisory authority in the UK can be found at <https://ico.org.uk/make-a-complaint>.

17. MARKETING

We may use your Personal Data to send you information about the services provided by the ZipRecruiter Group; provided, however that we will obtain consent to do so where required by applicable law. You may unsubscribe from our marketing e-mails by clicking "Unsubscribe" in any promotional e-mail communications we send you. As permitted by applicable law, you cannot opt-out of non-marketing, services-related notices.

18. CHANGES TO THIS PRIVACY POLICY

We reserve the right to change this Privacy Policy at any time. If we propose to make any material changes, we will notify you by posting notice on the Website or by issuing an email to the email address listed by registered users prior to the changes becoming effective. You acknowledge that it is your responsibility to maintain a valid email address as a registered user, and to review the Website and this Privacy Policy periodically in order to be aware of any modifications. If you object to any changes to the revised Privacy Policy, you can stop using our services and close your account with us. However, if you continue to use our services (including the Website) after we publish a new or updated Privacy Policy, you acknowledge that such continued use means that the treatment of your Personal Data will be subject to the new or updated Privacy Policy.

19. MINORS & CHILDREN

Our Services and the Website are not intended for use by persons under the age of 18 years. ZipRecruiter does not knowingly collect or solicit Personal Data from anyone under the age of 13 or knowingly allow such persons to register to use our Website. In the event that we learn that we have collected Personal Data of a child under the age of 13, we will delete that data to the extent required by applicable law as quickly as possible. If you believe that we might have any Personal Data from or about a child under 13, please contact us at privacy@ziprecruiter.com.

20. MOBILE APP USERS IN THE UNITED KINGDOM

If you use our mobile application ("App"), the CV/resume you upload in the App will be the default CV/resume used when you apply to jobs in the App. You can update your name and email, or replace your CV/resume, by going to the "Account" icon available on the App's home page. Your personal data and CV/resume may be deleted at any time by deleting the App from your device.

You may opt out of providing your location information by using your device settings. On your Android device, go to 'Settings' > 'Apps' > 'ZipRecruiter' > 'Permissions,' and de-select 'Location'.

If you sign up to receive job alert emails in the App, you can unsubscribe at any time by clicking the "Unsubscribe" link in any job alert email you receive.

21. HOW TO CONTACT US

Data Privacy Questions. If you have any questions regarding our personal data practices, please contact us by using the communication means described below.

LOCATION OF DATA SUBJECT	TYPE OF ENQUIRY	EMAIL ADDRESS	MAILING ADDRESS	TELEPHONE	LIVE CHAT
EEA and Switzerland	Data Subject Information/Access Requests	dsars@ziprecruiter.com	See Below	Send Request by Mail or Email	Send Request by Mail or Email
Outside the EEA and Switzerland	Privacy-Related Questions	privacy@ziprecruiter.com	See Below	Send Request by Mail or Email	Send Request by Mail or Email

Technical or Customer Service Questions. Wherever you are located, if you have any questions as regards the use of our services, questions about your account, and/or technical or other customer support questions regarding your use of our services, please contact us by using the communication means described below.

TYPE OF ENQUIRY	CONTACT	EMAIL ADDRESS	MAILING ADDRESS	TELEPHONE	LIVE CHAT
Technical Support	Customer Service	support@ziprecruiter.com or support@ziprecruiter.co.uk	See Below	US 1-877-252-1062 (6am - 6pm PST)	Via Website
				UK 0808-281-9407 (8am - 4:30pm GMT)	
General Customer Service Enquiries	Customer Service	cs@ziprecruiter.com or cs@ziprecruiter.co.uk	See Below	US 1-877-252-1062 (6am - 6pm PST))	Via Website

Mailing Addresses

U.S. Mailing Address	U.K. Mailing Address
ZipRecruiter, Inc. Attn: Business Affairs 604 Arizona Avenue Santa Monica, California 90401, USA Delaware Corporation File Number: 4829724 ICO Registration Number: ZA454860	ZipRecruiter UK Ltd. C/o Fieldfisher LLP Riverbank House, 2 Swan Lane, London, EC4R, England, UK Company No. 9988220 ICO Registration Number: ZA197224

U.S. Mailing Address

U.K. Mailing Address

Article 27 Representative

ZipRecruiter UK Ltd.

C/o Fieldfisher LLP

Attn: Privacy

Riverbank House, 2 Swan Lane, London, EC4R, England, UK

Email: art27rep@ziprecruiter.com