

RECREWMINT Privacy Policy

Recrewmint Inc. ("we"/"us"/ "our"). has created this Privacy Policy to set out how we collect, use, and disclose Personal Information (defined in Section 1 below) collected through Recrewmint ("Website"), any of its subpages and/or subdomains and its affiliated sites, and any mobile application associated with the foregoing (collectively with the Website, the "Service"). This Privacy Policy also applies to the Personal Information we collect when you engage with us on social media, or otherwise interact with us in using the Service in accordance with our Terms of Use. Please review this Privacy Policy carefully.

Privacy is of great importance to us. By visiting, accessing, or using the Service in any manner, you acknowledge that you accept the practices and policies outlined in this Privacy Policy and you hereby consent to the collection, use, and disclosure of your Personal Information in accordance with this Privacy Policy.

1. WHAT DOES THIS PRIVACY POLICY COVER?

What is Personal Information? Personal Information means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).

A Note About Children. You must be at least of legal age in your jurisdiction to use the Service, and only with the consent of a parent or guardian in accordance with our Terms of Use. We do not intentionally gather Personal Information from visitors who are under the age of 13. If a child under 13 submits Personal Information to us and we learn that the Personal Information is the information of a child under 13, we will attempt to delete the information as soon as possible. If you believe that we might have any Personal Information from a child under the age of 13, please contact us at info@recrewmint.com.

A Note to Users Outside of the United States and Canada. If you are a non-U.S. or non-Canadian user of the Service, by visiting the Sites or App and providing us with data, you acknowledge and agree that your Personal Information may be processed for the purposes identified in this Privacy Policy. In addition, your Personal Information may be processed in the country in which it was collected and in other countries, including the United States and Canada, where laws regarding the processing of Personal Information may be less stringent than the laws in your country. By providing your data, you consent to such transfer.

Third-Party Disclaimer. Please note that this Privacy Policy does not apply to the practices of third parties that we do not own or control, including but not limited to any third-party websites, services, and applications, that you elect to access in connection with the Service or third parties that may resell our products. You are responsible for ensuring that you have obtained the necessary authorizations and consents for any Personal Information you make available to us for use in accordance with this Privacy Policy.

Lawful processing: We process your Personal Information only to the extent necessary for the performance of our obligations to you, which is in providing our products and the Service. We set out below the type of Personal Information that we collect and how we use it. Except as set forth in this Privacy Policy, your Personal Information will not be used for any other purpose without your consent. You may withdraw your consent to our processing of your Personal Information at any time. However, withdrawing consent may result in your inability to continue using the Service.

2. COLLECTION AND USE OF PERSONAL INFORMATION AND OTHER DATA

- **Information you provide.** You may provide us with Personal Information and we may collect any such Personal Information when you: (i) contact us through our online or email forms (including sending us queries, joining our subscriber list to be updated on releases of our products, or responding through the Service to listed job postings), as well as through any third party social media accounts connected to our Services from time to time (i.e. Instagram, Facebook, Twitter, LinkedIn, or otherwise); (ii) fill out an online request or contact form; (iii) use your computer or mobile device to access our Service; and (iv) to simply visit or browse our Service.
- **Information we collect.** Our Service may collect Personal Information in connection with your actions on our Service including, your full name, and email address, your computer or mobile device's unique ID number, your geolocation, and your communication preferences, and your preferences in receiving marketing from us and third parties (including vendors). We do not collect payment or credit card information on our Service.

- **Cookies and Automatic Tracking (How we Collect your Information).** We automatically collect certain statistical, system log data, and other data about traffic to our Service. This information includes IP addresses, page views, browser type and version, time zone setting and location, browser plug-in types and versions, operating system, type of device and platform and other technology you use to access and use the Service, how you use the Service (for instance, the buttons, controls, products, and ads you click on), pages of our Website that you visit, the time spend or have spent on those pages, your search queries, the dates and times of your visits, the webpage you were visiting before you accessed our Service, the webpages and app(s) you use after accessing and using our Service, and demographics such as gender and age of visitors and interest-based information (i.e. “session cookies”). A “cookie” is a small amount of data that is placed on your device, which may include a unique identifier. Cookies are sent to your browser from the Service and stored on your device. We use cookies to recognize devices and to collect information about Service users as described above. You may be able to set your browser to notify you when you are sent a cookie. This gives you the chance to decide whether or not to accept it. Various browsers may offer their own management tools for removing these types of tracking technologies. If you disable cookies, you may not be able to take advantage of all the features of the Service.
- **Google Analytics and Cookies.** Some of the information we receive is obtained through the use of first-party and third-party beacons, scripts, and tags. The cookies we use on our Service are served by Google Analytics. When you visit our Service for the first time, you will have the option to enable or disable certain cookies. Information on how to opt out of the Google Analytics browser add-on can be accessed at <https://tools.google.com/dlpage/gaoptout/>.
- **How Does Targeted Advertising Work?** For more information about how targeted advertising works, you can visit the Network Advertising Initiative’s (“NAI”) educational page at <http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>. You may opt out by clicking here: <https://optout.networkadvertising.org/?c=1>.
- **Cookies, Trackers, and Targeted Advertising.** You can opt-out of targeted advertising by using the links below:
 - Facebook: <https://www.facebook.com/settings/?tab=ads>
 - Google: <https://www.google.com/settings/ads/anonymous>
 - Instagram: https://www.facebook.com/help/instagram/2885653514995517?locale=en_US
- **Opting out of Targeted Advertising.** Additionally, you can opt-out of some of these services by visiting the Digital Advertising Alliance’s opt-out portal at: <http://optout.aboutads.info/>.

3. **Use of Personal Information.** We use all of this information collected to, better understand the reach of our Service, and provide and deliver the Service, process, and complete transactions, and send you related information, including confirmations of any orders you place with respect to deals offered by vendors on our Service, respond to comments, questions, and requests and provide customer service, support, troubleshooting, and better user experience. We also use the information to communicate with you about services, features, surveys, newsletters, offers, promotions, contests, and events, and provide other news or information about us and our select partners; investigate and prevent fraudulent transactions, unauthorized access to the Service, and other illegal activities; monitor and analyze trends, usage, and activities in connection with the Service and for marketing or advertising purposes; link or combine with other information we receive from third parties to help understand your needs and provide you with better service; to improve and tailor our products and services to our customer base and for other business purposes. We do not link any of the information we use in cookies to any personally identifiable information submitted by you when you are on the Service.

4. STORAGE LOCATION AND TRANSFER OF PERSONAL INFORMATION

We store our data, including Personal Information, on servers located in [INSERT STATE/COUNTRY]. By submitting information, you agree to the transfer, storage, and/or processing of your Personal Information in [INSERT STATE/COUNTRY]. You acknowledge and agree that your Personal Information may be accessible to law enforcement and governmental agencies in Canada under lawful access regimes or court order in the jurisdiction that the Personal Information is stored.

5. DISCLOSURE OF PERSONAL INFORMATION WITH THIRD PARTIES

- **Disclosure of Statistical Data.** We may disclose aggregate statistical data to our partners and clients, such as advertisers and other third parties, who may use the data for business purposes. This information does not include any Personal Information.
- **Service Providers and Business Partners.** We may from time to time employ other companies and people to perform tasks on our behalf and need to share Personal Information with them to provide information and services to you. Unless we tell you differently, such third parties do not have any right to use the Personal Information we share with them beyond what is necessary to assist us. This includes third-party companies and individuals employed by us to facilitate our business, including database management, web analytics, and general improvement of our products and services.
- **Business Transfers.** If we (or substantially all of our assets) are acquired, or if we go out of business, enter bankruptcy, or go through some other change of control, Personal Information may be made available or otherwise transferred to the new controlling entity, where permitted under applicable law.
- **With Your Consent.** If we need to use or disclose any Personal Information in a way not identified in this Privacy Policy, we will notify you and/or obtain your express consent as required under applicable privacy laws.
- **As Required by Law.** We may disclose your Personal Information to third parties without your consent if we have reason to believe that disclosing this information is necessary to identify, contact, or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other users, or anyone else (including the rights or property of anyone else) that could be harmed by such activities. Further, we may disclose Personal Information when we believe in good faith that such disclosure is required by applicable law. We also reserve the right to access, read, preserve, and disclose any information as we reasonably believe is necessary to, satisfy any applicable law, regulation, legal process, or governmental request; enforce our contracts or user agreement, including investigation of potential violations hereof; and detect, prevent, or otherwise address fraud, security or technical issues. This disclosure of information may include exchanging information with other companies and organizations for fraud protection and spam/malware prevention. Notwithstanding the general terms of our Privacy Policy, the collection, use, and disclosure of Personal Information may be made outside of the terms herein to the extent provided for in any applicable privacy or other legislation in effect from time to time, or pursuant to court orders.

6. SECURITY

The security of your Personal Information is important to us. We use commercially reasonable efforts to store and maintain your Personal Information in a secure environment. We take technical, contractual, administrative, and physical security steps designed to protect the Personal Information that you provide to us. We have implemented procedures designed to limit access, input, transmission, security of availability, separation, and dissemination of your Personal Information to only such designated staff as are reasonably necessary to carry out the stated purposes we have communicated to you.

7. RETENTION

We will keep your Personal Information for as long as it remains necessary for the identified purpose or as required by law, which may extend beyond the termination of our relationship with you. We may retain certain data as necessary for legitimate business purposes, such as analysis of aggregated, non-personally-identifiable data, account recovery, or if required by law. All retained Personal Information will remain subject to the terms of this Privacy Policy.

8. ACCESS, CORRECTION, AND ACCURACY

You have the right to access the Personal Information we hold about you to verify the Personal Information we have collected with respect to you and to have a general account of our uses of that information. Upon receipt of your written request, we will provide you with a copy of your Personal Information, although in certain limited circumstances, and as permitted under law, we may not be able to make all relevant information available to you, such as where that information also pertains to another user. In such circumstances, we will provide reasons for the denial to you upon request. We will endeavor to deal with all requests for access and modifications in a timely manner.

We will make every reasonable effort to keep your Personal Information accurate and up to date, and, if applicable, we will provide you with mechanisms to update, correct, delete or add to your Personal Information. As appropriate, this amended Personal Information will be transmitted to those parties to which we are permitted to disclose your information. Having accurate Personal Information about you enables us to give you the best possible service.

- 9. CALIFORNIA PRIVACY RIGHTS** This Section 9 provides additional details about the Personal Information we collect about California consumers and the rights afforded to them under the *California Consumer Privacy Act* (the “**CCPA**”). For more details about the Personal Information Recrewmint has collected over the last 12 months, please see the section “Information you provide us” above. We collect this Personal Information for commercial purposes described above. Recrewmint does not sell (as that term is defined in the CCPA) the Personal Information we collect. Subject to certain limitations, the CCPA provides California consumers the right to request to know more details about the categories or specific pieces of Personal Information we collect (including how we use and disclose this Personal Information), to delete their Personal Information, to opt-out of any “sales” or “sharing” of Personal Information that may be occurring, and to not be discriminated against for exercising these rights.

California consumers may make a request pursuant to their rights under the CCPA by contacting us at the contact information below. We will verify your request using the information associated with your account, if available, including your email address. Government identification may be required. Consumers can also designate an authorized agent to exercise these rights on their behalf.

10. CHANGES TO THIS PRIVACY POLICY

We may amend this Privacy Policy from time to time. Use of Personal Information we collect is subject to the Privacy Policy in effect at the time such information is collected, used, or disclosed. If we make material changes or changes in the way we use Personal Information, we will notify you by posting an announcement on our Services or sending you an email prior to the change becoming effective. You are bound by any changes to this Privacy Policy when you use the Service after such changes have been first posted.

11. ADDITIONAL INFORMATION, REQUESTS, AND QUESTIONS:

Questions regarding this Privacy Policy or our privacy practices should be directed to info@recrewmint.com.

Last Updated: January 23, 2023