



# JOBALIGN PRIVACY STATEMENT

Last Updated: January 2024

This privacy statement describes how Jobalign, an Equifax Company (collectively, "Company", "we", "us", "our") collects, uses, and shares personal data about individuals and businesses obtained through our websites, applications, and mobile platforms. We are committed to maintaining the privacy of all data under our control, including personal data that you provide to us when using any of our Services.

**Disclaimer.** Our site contains links to websites operated by third parties. Jobalign is not responsible for the practices or privacy policies of these websites, and our Privacy Statement does not apply to them.

## Candidates

### Personal Data Collected

Jobalign collects the following categories of personal data:

- **Name and contact information.** Your first and last name, email address, home address, phone number, level of education attained, and work history.
- **Application responses.** Your responses to a wide range of questions selected by the employer during the interview process. Responses are recorded as binary ("yes" or "no") or multiple choice questions, written responses, or voice responses collected during automated voice interviews.
- **Communication with Employers.** Employers may select to use our Messenger service, which enables them to communicate directly to you by text message if you choose. All communications utilizing this service are stored in Jobalign to be presented to and saved for the use of the employer.
- **Equal Employment Opportunity Commission (EEOC).** Applications may request questions in relation to EEOC information including Sex/Gender, Ethnicity, Veteran, and/or Disability Status. This section of the application is optional.
- **Communication with Jobalign.** Jobalign provides multiple channels of communication including email, automated support, and customer service. Some communications are stored for future reference and to help provide the best customer experience possible.
- **Use of Jobalign's System.** Jobalign maintains a record of various interactions with our system including, but not limited to, access, actions/activities, and errors that occur during use. Examples of actions collected include, but are not limited to, clicks, page views, your IP address, and search queries. Jobalign may store this information on its equipment or the equipment of third parties that it has a relationship with for that purpose.

## How We Use and Disclose Personal Data

We may use and disclose personal data for various business purposes, including:

- Compiling, screening, and presenting job applications to the employers that utilize our services.
- Identifying additional jobs that align with your skill set, work experience, and educational background, through internal analysis or partnerships with recruiters.
- Maintaining and improving system stability, performance and functions.

## Sharing Your Personal Data

**Affiliates and Third Parties:** We may share your personal data with companies that control, are controlled by, or under common control with Jobalign, as well as selected third parties with whom Jobalign works (see below).

- **Applicant Tracking System/Human Capital Management (ATS/HCM).** Some employers may utilize an additional ATS or HCM system. Job applications and related information may be shared with those systems by direct integration through secure channels or be input by employers directly.
- **Onboarding/Background Check.** Candidates that meet the basic screening requirements, may be moved to the next step in the hiring process which includes sharing limited basic information with external onboarding and background check services. This data includes first and last name, email address, and a unique identifier.
- **Work Opportunity Tax Credit (WOTC) providers.** Most employers participate in the WOTC program and can include the screening as part of the Jobalign application process. If an employer elects to utilize this service, your contact information and Jobalign unique identifier may be shared.
- **Communication Providers.** If you communicate with Jobalign by email or text message, your email address and phone number may be shared with our service providers. Your email address and phone number are not resold or reused and are only used to communicate with you.

Additionally, we may share your personal data with the following categories of recipients:

- **Disclosure for Legal Reasons or as necessary to protect Jobalign.** We may release personal data to other parties (1) to comply with valid legal requirements such as laws, regulations, search warrants or court orders; (2) in special cases, such as a physical threat to you or others, a threat to public security, or a threat to Jobalign's systems or networks; or (3) in cases in which Jobalign believes it is reasonably necessary to investigate or prevent suspected or actual harm, abuse, fraud, or illegal conduct.
- **Changes in Jobalign's corporate structure.** If all or any part of Jobalign is sold, merged or otherwise transferred to another entity (including a transfer of assets), your personal data may be transferred as part of that transaction.

## Choices and Control over your Information

By providing Jobalign with information, you are consenting to the collection, use, disclosure, and storage of your personal data as set out in this Privacy Statement. Subject to legal, business, or contractual requirements, you can withdraw your consent to our collection, use, disclosure, and storage of information at any time upon giving us reasonable notice. However, withdrawing your consent may limit or prevent us from providing you with, or being able to continue to provide you with, specific products and services.

It is required that your personal data be shared with employers during the application process. You may opt-out of further communication and or information sharing, as well as requesting your information be deleted at any time. Communication and sharing preferences can be managed through your profile, unsubscribe links in emails, by calling (844) 303-6433, completing our standard online support form at Jobalign Support, or clicking Do Not Sell My Personal Information.

Please note all requests will be handled in the order in which they were received and processed according to local and federal regulations. Based on the status of your application/employment status with employers using Jobalign, some information may be retained and deleted at a later date based on local and federal regulations for employment data retention.

Residents of California please see below for additional information.

## California Applicants Privacy Statement and Notice at Collection

The below section, as required by the California Privacy Rights Act of 2020 ("CPRA"), applies solely to Applicants who reside in the State of California. Any terms defined in the CPRA have the same meaning when used in the below section.

### Categories of Personal Information Collected

We may collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Applicant or device ("personal information"). In particular, we may have collected the following categories of California Applicant personal information from the following sources within the last twelve (12) months:

Category	Examples	Sources	Collected
Identifiers	<p>Including, but not limited to:</p> <ul style="list-style-type: none"> <li>Name, alias, postal address, email address</li> <li>Unique personal identifier, online identifier, Internet Protocol address</li> <li>Account name</li> <li>Social Security number, driver's license number, passport number</li> </ul>	<ul style="list-style-type: none"> <li>Devices and browsers</li> <li>Directly from you</li> <li>Employers</li> <li>Third-party data providers</li> <li>Public records</li> </ul>	Yes
Personal information categories listed in the California Customer Records	Some personal information included in this category may	<ul style="list-style-type: none"> <li>Devices and browsers</li> <li>Directly from you</li> </ul>	Yes

<p>statute (Cal. Civ. Code § 1798.80(e))</p> <p>Any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, an individual's name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.</p> <p>Some personal information included in this category may overlap with other categories.</p>	<p>overlap with other categories.</p> <p>Including, but not limited to:</p> <ul style="list-style-type: none"> <li>• Name, address, telephone number</li> <li>• Social Security number, passport number, driver's license or state identification card number</li> <li>• Education</li> <li>• Employment and employment history</li> </ul>	<ul style="list-style-type: none"> <li>• Employers</li> <li>• Third-party data providers</li> <li>• Public records</li> </ul>	
<p>Protected classification characteristics under California or federal law</p> <p><i>An individual's age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</i></p>	<p>Including, but not limited to:</p> <ul style="list-style-type: none"> <li>• Age, race, citizenship, marital status, gender, veteran or military status, and ethnicity</li> </ul>	<ul style="list-style-type: none"> <li>• Devices and browsers</li> <li>• Directly from you</li> <li>• Employers</li> <li>• Third-party data providers</li> <li>• Public records</li> </ul>	Yes
<p>Internet or other similar activity</p>	<p>Including, but not limited to:</p> <ul style="list-style-type: none"> <li>• Information on an Applicant's interaction with a website, application, or advertisement</li> </ul>	<ul style="list-style-type: none"> <li>• Devices and browsers</li> <li>• Directly from you</li> </ul>	Yes
<p>Geolocation data</p>	<p>Including, but not limited to:</p> <ul style="list-style-type: none"> <li>• Physical location or movements</li> </ul>	<ul style="list-style-type: none"> <li>• Devices and browsers</li> <li>• Directly from you</li> </ul>	Yes

Professional or employment-related data	Including, but not limited to: <ul style="list-style-type: none"> <li>• Current or past job history, including employment dates, employer name, and employer information</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from you</li> <li>• Employers</li> <li>• Third-party data providers</li> <li>• Public records</li> </ul>	Yes
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Including, but not limited to: <ul style="list-style-type: none"> <li>• Education records including dates of attendance</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from you</li> <li>• Employers</li> <li>• Third-party data providers</li> <li>• Public records</li> </ul>	Yes
Inferences drawn from other personal information	Including, but not limited to: <ul style="list-style-type: none"> <li>• Personal preferences</li> <li>• Characteristics</li> <li>• Behavior</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from you</li> </ul>	Yes
Sensitive personal information	Some personal information included in this category may overlap with other categories. Including, but not limited to: <ul style="list-style-type: none"> <li>• Social Security number, driver's license number, state ID number, or passport number</li> <li>• Financial account information</li> <li>• Precise geolocation</li> <li>• Racial or ethnic origin, religious or philosophical beliefs</li> <li>• Contents of mail, email, or text messages</li> <li>• Biometric data</li> <li>• Medical or health data</li> <li>• Personal data that reveals a person's sexual orientation or sex life preferences</li> </ul>	<ul style="list-style-type: none"> <li>• Devices and browsers</li> <li>• Directly from you</li> <li>• Employers</li> <li>• Third-party data providers</li> </ul>	Yes

### **Purpose and Use of Personal Information Collected**

We may use or disclose the personal information we collect and maintain about you for one or more of the following purposes:

- Determining eligibility for employment, including verifying qualifications, providing and/or validating references, and maintaining notes on the same;
- Establishing training and development requirements;
- Completing applicable background checks and ongoing periodic background checks, as applicable;

- Assessing and managing performance, including disciplinary actions, job changes, quality control, and other job related activities, including academic or in-house study courses completion;
- Administering pay and benefits, including facilitating Verifications of Employment and Income through Equifax Workforce Solutions and its regional offerings, as applicable;
- Legal, accounting, and reporting requirements;
- Assessing workplace culture purposes;
- Enforcing Equifax Security Policies, including monitoring Equifax-issued devices or authenticating Applicants who require access to sensitive areas;
- Processing Applicant job-related claims (e.g., benefits, compensation, insurance claims, work health and safety claims); and
- Complying with applicable laws, including for government disclosures and security clearances.

### Disclosing your Personal Information

In the preceding 12 months, we may have disclosed the following categories of personal information to third parties for business purposes:

Category	May be disclosed for a business purpose to the following categories of third parties:
Identifiers	<ul style="list-style-type: none"> <li>● Accounting and taxation support and advice providers;</li> <li>● Human and social services providers;</li> <li>● Legal support and advice providers;</li> <li>● Recruitment services providers;</li> <li>● Security providers;</li> <li>● Software and technology providers;</li> <li>● Applicant development and recognition service providers.</li> </ul>
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	<ul style="list-style-type: none"> <li>● Accounting and taxation support and advice providers;</li> <li>● Human and social services providers;</li> <li>● Legal support and advice providers;</li> <li>● Recruitment services providers;</li> <li>● Security providers;</li> <li>● Software and technology providers;and</li> <li>● Applicant development and recognition service providers.</li> </ul>
Protected classification characteristics under California or federal law	<ul style="list-style-type: none"> <li>● Accounting and taxation support and advice providers;</li> <li>● Human and social services providers;</li> <li>● Legal support and advice providers;</li> <li>● Recruitment services providers;</li> <li>● Security providers;</li> <li>● Software and technology providers;</li> <li>● Applicant development and recognition service providers.</li> </ul>
Internet or other similar activity	<ul style="list-style-type: none"> <li>● Security providers; and</li> <li>● Software and technology providers..</li> </ul>
Geolocation data	<ul style="list-style-type: none"> <li>● Security providers; and</li> <li>● Software and technology providers.</li> </ul>
Sensory Data	<ul style="list-style-type: none"> <li>● Security providers; and</li> <li>● Software and technology providers.</li> </ul>
Professional or employment-related data	<ul style="list-style-type: none"> <li>● Accounting and taxation support and advice providers;</li> </ul>

	<ul style="list-style-type: none"> <li>• Human and social services providers;</li> <li>• Legal support and advice providers;</li> <li>• Recruitment services providers;</li> <li>• Security providers;</li> <li>• Software and technology providers;and</li> <li>• Applicant development and recognition service providers.</li> </ul>
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	<ul style="list-style-type: none"> <li>• Equifax does not share this information with third parties.</li> </ul>
Inferences drawn from other personal information	<ul style="list-style-type: none"> <li>• Human and social services providers;</li> <li>• Security providers;</li> <li>• Software and technology providers; and</li> <li>• Applicant development and recognition service providers.</li> </ul>
Sensitive personal information	<ul style="list-style-type: none"> <li>• Accounting and taxation support and advice providers;</li> <li>• Human and social services providers;</li> <li>• Legal support and advice providers;</li> <li>• Recruitment services providers;</li> <li>• Security providers;</li> <li>• Software and technology providers;and</li> <li>• Applicant development and recognition service providers.</li> </ul>

Equifax does not sell personal information of its Applicants. Equifax only uses and discloses sensitive personal information of its Applicants as necessary to perform the contract we have entered into with you. Equifax retains personal information of its Applicants in accordance with applicable law.

### **Rights of California Applicants**

Applicants residing in the State of California have the right to submit the following privacy rights requests to Equifax:

#### **Know and Access**

You have a right to request Equifax provide you with the following information, covering the 12 months preceding the date your request is submitted:

- The categories and specific pieces of personal information collected about you.
- The categories of sources of the personal information collected about you.
- The business or commercial purposes for collecting your personal information.
- The categories of third parties to whom we disclosed your personal information for a business purpose.

#### **Deletion**

You have the right to request Equifax delete the personal information collected from you, subject to certain exceptions. Once we receive and confirm your request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with Applicant expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### **Correct**

You have the right to request that Equifax correct inaccurate personal information it maintains about you.

### **Submit a Privacy Rights Request**

Applicants wishing to exercise their right to know and access, delete, or correct their personal information may do so by contacting their Human Resources Business Partner or sending a request to [AskHR@equifax.com](mailto:AskHR@equifax.com). While every attempt will be made to satisfy a Applicant's request, certain exemptions may apply due to the nature of the Applicant's relationship with Equifax. If applicable, Equifax may deny a request for a number of reasons, including complying with applicable law and fulfilling contractual obligations.

### **Right to be Free from Discrimination**

Equifax is prohibited from discriminating against in any way in response to your exercise of any of these rights. This means we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.
- Offer a product enhancement or financial incentive that is contingent on you sharing personal information, unless that incentive is reasonably related to the value provided to us by that collection.

## **Data Retention**



Jobalign only retains your personal data for as long as needed to fulfill legitimate business purposes. In some cases, it may be necessary to retain your personal data for different periods. The factors that direct how long we may retain personal data include the following:

- Laws or regulations that we are required to follow;
- Whether we are in a legal or other type of dispute with each other or any third party;
- The type of information maintained about you; and
- Whether we are asked by you or a regulatory authority to keep your personal data for a valid reason.

## Cookies and Other Digital Tracking

### Cookies

We use session and persistent cookie technology. Cookies are text files saved by a device's browser that stores information. That information is available to us later when the browser returns to one of our websites.

### Third-party Cookies and Tracking Technology

Our partners use cookies, web beacons, and other technologies for similar purposes. We have agreements with companies, sometimes called "Ad Networks," that serve advertising on behalf of other companies. These Ad Networks may place or recognize a cookie, called a "third party cookie," on a visitor's computer when they visit a website not affiliated with us that has a contract with them. Ad Networks use cookies to understand web usage patterns of people who see advertisements, to control the sequence of advertisements they see, to provide them with the most relevant advertising, and to make sure they don't see the same ad too many times. Ad Networks may connect information about pages visited on our site with information about pages visited on other sites. They show advertising based on this combined information, including advertising for our products.

While we do not control Ad Networks or what they do with the information they collect, we only work with companies that have agreed to participate in the Network Advertising Initiative (NAI), the Digital Advertising Alliance (DAA), and/or the Interactive Advertising Bureau (IAB), and abide by the associated principles.

### Analytics Services

Our website and online advertisements often contain web beacons or similar technologies from third-party analytics providers, which help us compile aggregated statistics about the effectiveness of our promotional campaigns or other operations. These analytics providers are able to set or read their own cookies on your device through which they can collect information about your online activities across applications, websites, and other products. To learn more about controlling information provided to these analytics providers, click on the following links: [Adobe opt-out site](#), [Google Analytics Opt-out Browser Add-on](#).

### Social Media Features and Widgets

Our services and website include social media features, widgets, and interactive mini-programs. These features may collect your IP address, the specific page you are

visiting on our site, and may place a cookie on your device to maintain site functionality. social media features are either hosted by a third party or hosted directly on our site. Your interactions with these features are governed by the privacy policy of the company providing it.

## Children's Information

Our websites and Services are not directed to children under 13 and we do not knowingly collect personal data from children.

## Employers

Jobalign collects the following Employer information:

- **Business Contacts.** The first and last names, email addresses, and phone numbers (optional) of the business representative that will manage text notifications with potential candidates.
- **Business Information.** Company name, address, and the business units within your company that will be utilizing Jobalign.
- **Jobs.** Job postings must include the job title, description, location, requirements, advertising choice, and number of applicants requested.
- **Interview Questions.** Jobalign allows employers to create their own interview questions for posted jobs. All questions are collected and stored in Jobalign.
- **Communication with Jobalign.** Jobalign provides multiple channels of communication including: email, automated support, and customer service. Some communications are stored for future reference and to help provide the best customer experience possible.
- **Use of Jobalign's System.** Jobalign maintains a record of various interactions with our system including but not limited to: access, actions/activities, and errors that occur during use. Examples of actions collected include but are not limited to: clicks, page views, your IP address, and search queries. Jobalign may store this information on its equipment or the equipment of third parties that it has a relationship with for that purpose.

## How We Use and Disclose Information

We may use and disclose Employer information for various business purposes, including:

- Creating job postings to be presented and applied to by potential employees.
- Communicating with business contacts about the status of posted jobs, potential candidates that have applied and other system related notifications.
- Maintaining and improving system stability, performance and functions.

## International Data Usage

Jobalign.com is hosted in the United States and is intended for visitors located within the United States. If you choose to access Jobalign.com from the European Union or other regions of the world with laws governing data collection and use that may differ from U.S. law, please note that you are transferring your personal information outside those regions to the United States for storage and processing. We may transfer your data from the U.S. to

other countries or regions in connection with storing and processing data, fulfilling your requests, and operating the Service. By providing any information, including personal information, to us, you consent to such transfer, storage, and processing.

## Security

We are committed to protecting the security of your personal data and use a variety of security technologies and procedures to help protect your personal data from unauthorized access, use, or disclosure. However, no data transmission or storage can be guaranteed to be 100% secure. As a result, while we strive to protect the personal data we maintain, we cannot ensure or warrant the security of any information that you transmit to us. Jobalign complies with applicable data protection laws, including security breach notification laws.

## Testimonials

We may display personal testimonials of satisfied customers on our website, in addition to other endorsements. We may post your testimonial along with your first name. If you wish to update or delete your testimonial, you can contact us at [support@jobalign.com](mailto:support@jobalign.com).

## Changes to this Privacy Statement

We may change this online privacy statement in the future. If we make changes to this privacy statement we will post the revised privacy statement and its effective date on this website.

## Contact Us

If you have questions or comments about this privacy statement, please submit an inquiry through our [Privacy Contact Form](#) or write to the Chief Privacy Officer, Equifax Inc., 1550 Peachtree Street, NW, Atlanta, GA 30309. Please select "General Privacy Question" as the Subject and reference "Jobalign Privacy Statement" in your submission when contacting us about Jobalign.