

JOBLURE™ PRIVACY POLICY

APP PRIVACY POLICY

This privacy policy (“**Privacy Policy**”) applies to the treatment of personally identifiable information (“**personal information**”) submitted by, or otherwise obtained from, you in connection with the JobLure™ digital employment application platform (the “**App**”) that facilitates users’ submission of preliminary employment application information to prospective employers. The App is provided by Valley Tech, LLC (“**Processor**”). By using or otherwise accessing the App, you acknowledge that you accept the practices and policies outlined in this Privacy Policy.

The App is operated and controlled by an organization in the United States, and is not intended to subject Processor or any affiliated entity to the laws or jurisdiction of any state, country or territory other than that of the United States. We may limit the App’s availability, in whole or in part, to any person, geographic area or jurisdiction we choose, at any time in our sole discretion. If you are located in the European Union, Canada or elsewhere outside the United States, please be aware that any information you provide to us will be transferred to the United States. By using the App or providing us with your information, you fully understand and unambiguously consent to this Privacy Policy and to the collection, storage, and processing of such information in the United States of America.

WHAT PERSONAL INFORMATION DOES PROCESSOR COLLECT?

We collect the following types of personal information from our users:

1. Personal Information You Provide to Us:

We may receive and store any information you submit to the App or otherwise authorize us to obtain – such as, for example, from your Facebook account. The types of personal information collected may include:

- For an employment applicant (an “**Applicant**”), your full name, email address, mobile telephone number, demographic information, [immigration status,] information confirming that you are legally entitled to work, and any other information necessary for us to provide the App services. A prospective employer (an “**Employer**”) may follow up with an Applicant through the App and request additional information, for which the Employer will be solely responsible.
- For an employee authorized by your Employer (an “**Authorized User**”) to access the Employer portal portion of the App, your full name, email address, mobile telephone number and additional information necessary to confirm that you are in fact your Employer’s Authorized User.
- For an Applicant who has been successfully hired by an Employer, additional information necessary for onboarding the Applicant may be requested by the Employer. Such information may include the successful Applicant’s Social Security number, birthdate and other sensitive personal information.

2. Personal Information Collected Automatically:

We receive and store certain types of usage related information whenever you interact with the App. For example, Processor may automatically receive and record information regarding your computer’s IP address, browser information, Facebook user ID, and any

pages within our website that you access. Such information may be shared in aggregate (non-personally identifiable) form with companies that contract with us for information and other services.

HOW DOES PROCESSOR USE THE INFORMATION IT COLLECTS?

Processor uses the information described in this Privacy Policy (i) internally, to analyze, develop and improve its products and services, (ii) to communicate with Authorized Users with respect to updates, enhancements, alerts and other information concerning the App and (iii) as set forth below in the “Will Processor Share Any of the Personal Information It Collects” section below.

EMPLOYER TREATMENT OF PERSONAL INFORMATION.

Processor may provide personal information to the applicable Employer, which will be the prospective employer an Applicant designates at the time of initial or subsequent interaction with the App. The Employer’s use of any personal information is subject to our contractual restriction on use solely for internal employment candidate evaluation purposes.

WILL PROCESSOR SHARE ANY OF THE PERSONAL INFORMATION IT RECEIVES?

Personal information about our users is an integral part of our business. We neither rent nor sell your personal information to anyone (with the exception of sharing your information with an applicable Employer – see the “Employer Treatment” section above). We share your personal information only as described below.

- **Employers:** We will share your personal information with an applicable Employer (see the “Employer Treatment” section above) designated at the time of your initial or subsequent interaction with the App.
- **Agents:** We employ other companies and people to perform tasks on our behalf and need to share your information with them to provide products or services to you. Unless we tell you differently, Processor’s agents do not have any right to use personal information we share with them beyond what is necessary to assist us. You hereby consent to our sharing of personal information for the above purposes.
- **Business Transfers:** In some cases, we may choose to buy or sell assets. In these types of transactions, customer information is typically one of the business assets that are transferred. Moreover, if Processor, or substantially all of its assets were acquired, or in the unlikely event that Processor goes out of business or enters bankruptcy, user information would be one of the assets that is transferred or acquired by a third party. You acknowledge that such transfers may occur, and that any acquirer of Processor may continue to use your personal information as set forth in this Privacy Policy.
- **Protection of Processor and Others:** We may release personal information when we believe in good faith that release is necessary to comply with the law; enforce or apply our [Terms of Use](#) and other agreements; or protect the rights, property, or safety of Processor, our employees, our users, or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.
- **With Your Consent:** Except as set forth above, you will be notified when your personal information may be shared with third parties, and will be able to prevent the sharing of this information.

CONDITIONS OF USE.

If you decide to use or otherwise access the App, your use/access and any possible dispute over privacy is subject to this Privacy Policy and our [Terms of Use](#), including limitations on damages, jurisdiction and venue for the resolution of disputes, and application of West Virginia state law.

THIRD PARTY APPLICATIONS/WEBSITES.

The App may permit you to link to other applications or websites. Such third party applications/websites are not under Processor's control, and such links do not constitute an endorsement by Processor of those other applications/websites or the services offered through them. The privacy and security practices of such third party application/websites linked to from the App are not covered by this Privacy Policy, and Processor is not responsible for the privacy, security practices or content of such websites.

WHAT PERSONAL INFORMATION CAN I ACCESS?

Processor allows you to access the following information about you for the purpose of viewing, and in certain situations, updating that information. This list may change in the event the App changes.

- Applicants may correct information submitted through the App on a single occasion in response to a hyperlink we send each Applicant for the purpose of verifying such information.
- Authorized Users may access and change any of the following:
 - Account and Authorized User profile information
 - Authorized User e-mail address
 - Facebook profile information
 - App specific data

CAN CHILDREN USE THE APPLICATION?

Our App and the services available through Processor are not intended for children under the age of 13. Processor does not knowingly collect information about children under the age of 13 and believes that children of any age should obtain their parents' consent before giving out any personal information. We encourage you to participate in your child's web experience. If we become aware that we have unknowingly collected personal information from a child under the age of 13, we will make reasonable efforts to delete such information from our database.

SECURITY AND CONFIDENTIALITY OF PERSONAL INFORMATION

To prevent unauthorized access, maintain data accuracy and ensure the correct use of personal information submitted on the App and otherwise, Processor has put in place appropriate physical, electronic, and managerial procedures which Processor regards as appropriate to safeguard and secure the personal information Processor collects online.

Processor uses encryption technology to protect the security of the information transmitted through the App, its website and related services. Personal information submitted on the App is encrypted and transmitted to a secure database server using Secured Socket Layer encryption technology.

NO LIABILITY FOR ACTS OF THIRD PARTIES

Although Processor will use reasonable efforts to safeguard the confidentiality of the personal information you submit, transmissions made by means of text messaging and the internet cannot be made absolutely secure. Processor will have no liability for disclosure of information and data you submit to it due to errors in transmission, unauthorized acts of third parties or through the use of third party cookies, programs, routines, viruses or other devices on your phone or computer.

RETENTION OF PERSONAL INFORMATION

Processor has procedures that govern the retention of both your personal information and other data. Your personal information will be retained so long as is necessary to fulfill the needs of the applicable Employer and for a reasonable time thereafter, or as required by relevant statutory, regulatory or contractual requirements.

CHANGES TO THIS PRIVACY POLICY.

Processor may amend this Privacy Policy from time to time. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is used. If we make changes in the way we use personal information, we will notify you by posting an announcement on our website or sending you an email. Each users is bound by any changes to the Privacy Policy when he or she uses or otherwise accesses the App after such changes have been first posted.

QUESTIONS OR CONCERNS.

If you have any questions or concerns regarding privacy in our App or on our website, please send us a detailed message at support@JobLure.com. We will make every effort to resolve your concerns.

Effective Date: March 1, 2019