Privacy Policy
Effective date, last update: June 1, 2026

At Findem, Inc. ("Findem," "we," "us," "our," or the "Company"), your privacy is important to us. Please read this Privacy Policy to learn how we treat your personal data. Findem is comprised of Findem AI, which provides an AI platform designed to help organizations identify both internal and external candidates for employment ("the Talent Platform"), Glider AI, which offers an AI-enabled skills assessment and interviewing platform that employers use to evaluate candidates through automated tests and structured hiring workflows (the "Verification Platform"), and Getro, which builds and manages professional communities, including alumni and referral networks (the "Network Platform").

Findem works with organizations to discover candidates from within their existing network ("ATS Candidate Data") or source business contact and other information related to individuals' professional or employment background ("Copilot Candidate Data") to match qualified candidates with open positions quickly and compliantly.

By using or accessing any of our candidate sourcing platforms, including the Talent Platform, Verification Platform, and Network Platform and associated app that cites to this Privacy Policy (together, the "Services") or visiting our online website ("Website"), you acknowledge that you have read and understood this Privacy Policy, which describes how we collect, use and share your information.

In the ordinary course of making these Services available, we process ATS Candidate Data about individuals at the direction of our customers. In those cases, we are a service provider, and our processing of that data is governed by the agreement in place between us and the applicable customer. The customer's privacy policy or other agreement between the customer and you or your organization, and not this Privacy Policy, applies to such processing. Where that is the case, please contact the relevant customer, and not Findem, in the first instance to address your rights with respect to such data.

And remember that your use of Findem's Services is at all times subject to our Terms and Conditions, available here, which incorporate our Privacy Policies, or the agreement in place between us and the applicable customer. Any terms we use in this Policy without defining them have the definitions given to them in the Terms of Use.

You may print a copy of this Privacy Policy from our Trust Center.

For a complete description and additional details related to our privacy practices, please read on below.

Privacy Policy Table of Contents

a. What this Privacy Policy Covers
b. What Personal Data We Collect
c. Sources of Personal Data
d. Purposes for Collecting or Disclosing Personal Data
e. Recipients of Your Personal Data
f. Tracking Tools, Advertising and Opt-Out
g. Data Security

h. Data Retention
i. Personal Data of Children
j. Marketing
k. Third Party Sites
l. Automated Decisions
m. Your Privacy Rights
n. Modifications to our Privacy Policy
o. Contact Information

a. What this Privacy Policy Covers

As stated above and described herein, this Privacy Policy applies only to the information collected from visitors to our Website, users of the Services or Copilot Candidates, who are those individuals whose Personal Data Findem identifies through public sources on behalf of our customers.

"Personal Data" means any information that identifies or relates to a particular individual and also includes information referred to as "personally identifiable information" or "personal information" or "sensitive personal information" under applicable data privacy laws, rules or regulations. Unless specified, the term Personal Data as used herein refers to the Personal Data of both Services Users and Copilot Candidate Data. This Privacy Policy does not cover the practices of companies we don't own or control or people we don't manage.

b. What Personal Data We Collect

This chart details the categories of Personal Data that we collect and have collected over the past 12 months regarding Talent Platform Users:

Category of Personal Data We Collect	Examples of Personal Data We Collect	Purposes for Processing and Legal Basis	Legal Bases for Processing	Categories of Third Parties With Whom We Share this Personal Data
Platform User Data	● First and last name ● Email ● Phone number ● Company name ● Unique identifiers, such as passwords	● Providing, Customizing and Improving the Services ● Marketing the Services ● Corresponding with You ● Meeting Legal Requirements and Enforcing Legal Terms ● To prevent, detect, and investigate potentially illegal	● Contractual Necessity ● Legitimate Interest ● Consent (in certain circumstances) ● Other processing ground (in certain circumstances)	● Vendors

		activities and to preserve the integrity of the Service		
Device / IP Data and Website Data	• IP address • Device ID • Domain server • Type of device/operating system/browser use to access the Services • Hashed identifiers • Web page interactions • Referring webpage/source through which you accessed the Services • Non-identifiable request IDs • Statistics associated with the interaction between device or browser and the Services	• Providing, Customizing and Improving the Services • Marketing the Services • To prevent, detect, and investigate potentially illegal activities and to preserve the integrity of the Service	• Legitimate Interest • Consent (in certain circumstances) • Other processing ground (in certain circumstances)	• Vendors • Analytics Partners
Payment Data	• Financial account information • Payment card type • Last 4 digits of payment card • Billing name, address, phone number, and email	• Providing, Customizing and Improving the Services • Meeting Legal Requirements and Enforcing Legal Terms • To prevent, detect, and investigate potentially illegal activities and to preserve the integrity of the Service	• Contractual Necessity • Legitimate Interest • Consent (in certain circumstances) • Other processing ground (in certain circumstances)	• Vendors(specifically our payment processing partner, currently Stripe, Inc.)
Geolocation	• IP address-based location information	• Providing, Customizing and Improving the Services	• Legitimate Interest	• Vendors • Analytics Providers

		• To prevent, detect, and investigate potentially illegal activities and to preserve the integrity of the Service	• Consent (in certain circumstances) • Other processing ground (in certain circumstances)	
Other Identifying Information that You Voluntarily Choose to Provide	• Identifying information in emails, letters, texts, or other communications you send us • Information on your social media profiles when they are linked to your Findem profile • Google contact data when you choose to connect your Google account, which you may disconnect at any time	• Providing, Customizing and Improving the Services • Marketing the Services • Meeting Legal Requirements and Enforcing Legal Terms • To prevent, detect, and investigate potentially illegal activities and to preserve the integrity of the Service	• Legitimate Interest • Consent (in certain circumstances) • Other processing ground (in certain circumstances)	• Vendors

This chart details the categories of Personal Data that we collect and have collected over the past 12 months regarding Copilot Candidates, Verification Platform Users, and Network Platform Users:

Category of Personal Data	**Examples of Personal Data We Collect**	**Purposes for Collection**	**Legal Bases for Processing**	**Categories of Third Parties With Whom We Share this Personal Data**
Candidate Profile or Contact Data	• First and last name • Email • Phone number	• Providing, Customizing and Improving the Services • Marketing the Services • Corresponding with You • Meeting Legal Requirements	• Legitimate Interest • Consent (in certain circumstances) • Other processing ground (in certain circumstances)	• Vendors • Business Partners

		and Enforcing Legal Terms ● To prevent, detect, and investigate potentially illegal activities and to preserve the integrity of the Service		
Candidate Demographic Data	● Gender* ● Ethnicity*	● Providing, Customizing and Improving the Services ● Marketing the Services ● Meeting Legal Requirements and Enforcing Legal Terms ● To prevent, detect, and investigate potentially illegal activities and to preserve the integrity of the Service	● Legitimate Interest ● Consent (in certain circumstances) ● Other processing ground (in certain circumstances)	● Vendors ● Business Partners
Candidate Professional or Employment-Related Data	● Resume/CV ● Job title ● Industry ● Job history ● Publicly available professional data, including job title, skills (i.e. contributions to github, stackoverflow, and other third-party platforms.)	● Providing, Customizing and Improving the Services ● Marketing the Services ● Meeting Legal Requirements and Enforcing Legal Terms ● To prevent, detect, and investigate potentially illegal activities and to preserve	● Legitimate Interest ● Consent (in certain circumstances) ● Other processing ground (in certain circumstances)	● Vendors ● Business Partners

		the integrity of the Service		
Candidate Professional Account Data	• Publicly available professional account data, including username, posts, and other job-related account information • Information from your resume or CV	• Providing, Customizing and Improving the Services • Marketing the Services • Meeting Legal Requirements and Enforcing Legal Terms • To prevent, detect, and investigate potentially illegal activities and to preserve the integrity of the Service	• Legitimate Interest • Consent (in certain circumstances) • Other processing ground (in certain circumstances)	• Vendors • Business Partners
Image and Voice Data, including Biometric Identifiers and Biometric Information	• Facial image • Facial video • Voice • With your consent, we may analyze facial images, video, or voice to verify your identity and confirm whether you've taken a similar assessment previously	• Providing, Customizing and Improving the Services • Corresponding with You • To prevent, detect, and investigate potentially illegal activities and to preserve the integrity of the Service	• Legitimate Interest • Consent (in certain circumstances) • Other processing ground (in certain circumstances)	• Vendors • Business Partners
Device Information and Web Analytics	• IP address • Web page interactions • Referring webpage/source through which you accessed the Services • Non-identifiable request IDs	• Providing, Customizing and Improving the Services • Marketing the Services • To prevent, detect, and investigate potentially illegal	• Legitimate Interest • Consent (in certain circumstances) • Other processing ground (in certain circumstances)	• Vendors • Analytics Partners

	• Statistics associated with the interaction between device or browser and the Services • Information about the device you use to connect to the Service (including the operating system, browser, etc.)	activities and to preserve the integrity of the Service		
Other Information You May Choose to Provide	• Any other information you may choose to provide, such as while sitting for an assessment	• Providing, Customizing and Improving the Services	• Legitimate Interest • Consent (in certain circumstances)	• Business Partners
Inferences Drawn From Other Personal Data Collected	• Inferences reflecting Copilot Candidate attributes	• Providing, Customizing and Improving the Services • Marketing the Services • To prevent, detect, and investigate potentially illegal activities and to preserve the integrity of the Service	• Legitimate Interest • Consent (in certain circumstances) • Other processing ground (in certain circumstances)	• Business Partners

* Findem makes probabilistic inferences of Demographic Data to generate aggregate-level statistics that customers can use in assessing their own recruiting practices, including to identify areas of over- or under-representation in their pipelines. Findem does not make Candidate-level gender or ethnicity inferences available to customers or otherwise sell such data. Additionally, this may be considered “sensitive personal information” under certain data protection laws. We use sensitive personal information only for the specific purposes disclosed above. Where required, we will obtain your consent when processing sensitive personal information unless otherwise permitted by law. Please note, if you do not consent, we may not be able to provide you with the specific Service you request.

This chart details the categories of Personal Data that we collect and have collected over the past 12 months regarding website visitors:

Category of Personal Data We Collect	Examples of Personal Data We Collect	Purposes for Processing and Legal Basis	Legal Bases for Processing	Categories of Third Parties With Whom We Share this Personal Data
Device Information and Web Analytics	● IP address ● Web page interactions ● Referring webpage/source through which you accessed the Services ● Non-identifiable request IDs ● Statistics associated with the interaction between device or browser and the Services ● Information about the device you use to connect to the Service (including the operating system, browser, etc.)	● Providing, Customizing and Improving the Services ● Marketing the Services ● To prevent, detect, and investigate potentially illegal activities and to preserve the integrity of the Service	● Legitimate Interest ● Consent (in certain circumstances) ● Other processing ground (in certain circumstances)	● Vendors ● Analytics Partners
Geolocation	● IP address-based location information	● Providing, Customizing and Improving the Services ● To prevent, detect, and investigate potentially illegal activities and to preserve the integrity of the Service	● Legitimate Interest ● Consent (in certain circumstances) ● Other processing ground (in certain circumstances)	● Vendors ● Analytics Providers

c. <u>Sources of Personal Data</u>

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

- **Directly From You**

- When you create an account or use our interactive tools and Services.
- When you voluntarily provide information in free-form text boxes through the Services or through responses to surveys or questionnaires.
- When you send us an email or otherwise contact us.
- When you enable optional proctoring features.
- When you post comments or opinions to us on the Service or third-party website where we have a profile or presence (e.g., on our Facebook page).

- **Automatically**
  - Through Cookies (defined in the "Tracking Tools, Advertising and Opt-Out" section below).
  - If you download our mobile application or use a location-enabled browser, we may receive information about your location and mobile device, as applicable.
  - If you download and install certain applications and software we make available, we may receive and collect information transmitted from your computing device for the purpose of providing you the relevant Services, such as information regarding when you are logged on and available to receive updates or alert notices.

- **From Public Records**
  - From government or other public sources.

- **From Third Parties**

  - The Organization That Created Your Profile
    - If you are provided with login details to access the Service through another organization's account, that organization may provide us with details to create a profile for you on the Service.
  - Vendors
    - We may use analytics providers to analyze how you interact and engage with the Services, or third parties may help us provide you with customer support.
    - We may use vendors, including data brokers, to obtain information to generate leads and create user profiles.
  - Advertising Partners
    - We receive information about you from some of our vendors who assist us with marketing or promotional services related to how you interact with our websites, applications, products, Services, advertisements or communications.
  - Professional Networks
    - If you provide your professional network account credentials to us or otherwise sign in to the Services through a third-party site or service, some content and/or information in those accounts may be transmitted into your account with us.
  - Other
    - We also license data from third parties that is collected from publicly-available sources around the internet, social media (including when you register for Services via Linkedin) and, in some cases, collect such data ourselves.

d. Purposes for Collecting or Disclosing Personal Data

We use Personal Data we collect in the following ways:

i. Providing, Customizing and Improving the Services

- Creating and managing your account or other user profiles.
- Processing orders or other transactions; billing.
- Providing you with the products, services or information you request.
- Meeting or fulfilling the reason you provided the information to us.
- Providing support and assistance for the Services.
- Improving the Services, including testing, research, internal analytics and product development.
- Personalizing the Services, website content and communications based on your preferences.
- Doing fraud protection, security and debugging.
- Carrying out other business purposes stated when collecting your Personal Data or as otherwise set forth in applicable data privacy laws.

ii. Marketing the Services

- Marketing and selling the Services.

iii. Corresponding with You

- Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about Findem or the Services.
- Sending emails and other communications according to your preferences or that display content that we think will interest you.

iv. Meeting Legal Requirements and Enforcing Legal Terms

- Fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.
- Protecting the rights, property or safety of you, Findem or another party.
- Enforcing any agreements with you.
- Responding to claims that any posting or other content violates third-party rights.
- Resolving disputes.

v. To prevent, detect, and investigate potentially illegal activities and to preserve the integrity of the Service.

We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated or incompatible purposes without providing you notice. If you are a California resident, please note that we only use or disclose your sensitive personal information for the purposes set forth in section 7027(m) of the CPRA regulations.

e. Recipients of Your Personal Data

We disclose your Personal Data to the categories of service providers and other parties listed in this section. Depending on state laws that may be applicable to you, some of these disclosures may constitute a "sale" of your Personal Data. For more information, please refer to the state-specific sections below.

- **Service Providers.** These parties help us provide the Website or perform business functions on our behalf. They include:
    - Hosting, technology and communication providers.
    - Security and fraud prevention consultants, Vanta and TAC Security, for compliance and auditing purposes.
    - Support and customer service vendors.
    - Payment processors.
- **Analytics Partners.** These parties provide analytics on web traffic or usage of the Services. They include:
    - Companies that track how users found or were referred to the Services.
    - Companies that track how users interact with the Services.
- **Business Partners.** These parties partner with us in offering various services. They include:
    - Organizations seeking to match qualified candidates with open positions quickly and compliantly.
    - Businesses that you have a relationship with.
    - Companies that we partner with to offer joint promotional offers or opportunities.
- **Professional Advisors.** These parties assist us with professional services.
    - Law firms.
    - Accountants.
    - Insurers.
    - Other professional advisors to the extent necessary.
- **Parties You Authorize, Access or Authenticate**.
    - Third parties you access through the services.
    - Other users.
- **Legal Obligations.**
    - We may share any Personal Data that we collect with third parties to exercise or defend legal claims, and in conjunction with any of the activities set forth under "Meeting Legal Requirements and Enforcing Legal Terms" in the "Our Commercial or Business Purposes for Collecting Personal Data" section above.
- **For Law Enforcement Purposes.**
    - We may share Personal Data with law enforcement where necessary to investigate, prevent, or take action regarding suspected or actual prohibited activities, including but not limited to, fraud, the protection of our systems, and other situations.
- **Business Transfers.**
    - All of your Personal Data that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part). Should one of these events occur, we will make reasonable efforts to notify you before your information becomes subject to different privacy and security policies and practices.
- **Data that is Not Personal Data.**

- We may create aggregated, de-identified or anonymized data from the Personal Data we collect, including by removing information that makes the data personally identifiable to a particular user. We may use such aggregated, de-identified or anonymized data and share it with third parties for our lawful business purposes, including to analyze, build and improve the Services and promote our business, provided that we will not share such data in a manner that could identify you.

Some of these disclosures may constitute a "Sale" or "Share" under data protection laws, such as when we disclose Copilot Candidate information, Verification Platform information, or Network Platform information to our business partners to help them identify employment candidates. To opt-out of our "selling" or "sharing" your Personal Data, please see the U.S. Privacy Rights section below. We do not "Sell" or "Share" biometric information or biometric identifiers, or sensitive personal information or Personal Data of individuals under 18 years of age.

f. Tracking Tools, Advertising and Opt-Out

The Services use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, "Cookies") to enable our servers to recognize your web browser, tell us how and when you visit and use our Services, analyze trends, learn about our user base and operate and improve our Services. Cookies are small pieces of data– usually text files – placed on your computer, tablet, phone or similar device when you use that device to access our Services. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s).

Please note that because of our use of Cookies, the Services do not support "Do Not Track" requests sent from a browser at this time.

We use the following types of Cookies:

- **Essential Cookies**. Essential Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Services. Disabling these Cookies may make certain features and services unavailable.
- **Functional Cookies**. Functional Cookies are used to record your choices and settings regarding our Services, maintain your preferences over time and recognize you when you return to our Services. These Cookies help us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Performance/Analytical Cookies**. Performance/Analytical Cookies allow us to understand how visitors use our Services. They do this by collecting information about the number of visitors to the Services, what pages visitors view on our Services and how long visitors are viewing pages on the Services. Performance/Analytical Cookies also help us measure the performance of our advertising campaigns in order to help us improve our campaigns and the Services' content for those who engage with our advertising.

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

To explore what cookie settings are available to you or to modify your preferences, use the privacy or security settings in your web browser (often found under "Privacy," "Security," or "Cookies").

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

We may use session replay technology in order to identify and resolve customer issues, to monitor and analyze how you use our Services, to better understand user behavior, and to improve our Services. You can manage your preferences regarding session replay technology by clicking on "Cookies Preferences" on the Privacy Rights link on our website. You may also configure your browser to reject or delete cookies. Please note, disabling cookies may affect the functionality of certain features on our website.

g. Data Security

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, organizational and administrative security measures based on the type of Personal Data and how we are processing that data. You should also help protect your data by appropriately selecting and protecting your password and/or other sign-on mechanism; limiting access to your computer or device and browser; and signing off after you have finished accessing your account. Although we work to protect the security of your account and other data that we hold in our records, please be aware that no method of transmitting data over the internet or storing data is completely secure.

h. Data Retention

We retain Personal Data about you for as long as necessary to provide you with our Services or to perform our business or commercial purposes for collecting your Personal Data. When establishing a retention period for specific categories of data, we consider:

- the categories of data subjects from whom we collected the data, our need for the Personal Data,
- why we collected the Personal Data,
- and the sensitivity of the Personal Data.

The specific retention periods (or, where this is not possible, the criteria used to determine them) for each category of Personal Data are set out below.

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

For example:

- We retain Platform User profile information and credentials for as long as you have an account with us.
- We retain Platform User payment data for as long as we need to process your purchase or subscription.
- We retain Platform User device/IP data for as long as we need it to ensure that our systems are working appropriately, effectively and efficiently.
- We retain Verification and Network Platform data for so long as we need it consistent with our legitimate interest in making such data available to organizations seeking to identify external candidates for employment.
- We permanently delete Biometric Data after it is no longer needed to verify your identity. We will permanently delete biometric information and biometric identifiers using industry-standard methods appropriate for the medium on which the data is stored.

i. Personal Data of Children

We do not knowingly collect or solicit Personal Data about children under 16 years of age (or such lower age set by applicable Member State law). If you are a child under that age, please do not attempt to register for or otherwise use the Services or send us any Personal Data. If we learn we have collected Personal Data from a child below the applicable age threshold, we will delete that information as quickly as possible. If you believe that such a child may have provided Personal Data to us, please contact us at 800-214-1467.

j. Marketing

We may use Personal Data for marketing and promotional purposes, such as to send marketing, advertising, and promotional communications by email or text message.

To opt out of receiving these messages, you may “unsubscribe” by following the instructions in the marketing message. Note, if you unsubscribe from marketing messages, we may still send you non-marketing materials related to the management of your account.

k. Third Party Sites

We may provide links to websites and other third-party content that is not owned or operated by Findem. The websites and third-party content may have separate notices or policies. Findem is not responsible for the privacy practices of these websites. If you provide any personal data through a third-party site, your interaction and personal data will be collected and controlled by the privacy policy of that third-party site. We recommend that you familiarize yourself with the privacy policies and practices of any such third-parties, which are not governed by this Privacy Policy.

l. Automated Decisions

When you apply for a position we may carry out a real-time automated assessment to help determine whether you are eligible for the position. The underlying logic of this assessment consists in matching the information you provide against the criteria we defined for the relevant role. We do not use these assessments to automatically rank, reject, or advance any candidates.

We do not make any eligibility or employment decisions or recommendations based solely on automated means. Each eligibility or employment decision or recommendation that produces legal or similarly significant effects is made with human involvement.

m. Your Privacy Rights

Depending on where you reside, you may have certain rights afforded to you. Please see the 'Exercising Your Rights' section below for instructions regarding how to exercise these rights. Please note that your rights may be subject to certain conditions or exceptions in accordance with applicable laws.

When you exercise these rights, we may need to ask you for additional information to verify your identity. We will not charge a fee unless your request is manifestly unfounded or excessive.

- **Access:** You may have the right to request confirmation of or access to the Personal Data that we process about you. You can also request access to a portable copy of your Personal Data. If you are an Oregon resident, you also have the right to request a list of specific third parties, other than natural persons, to which we has disclosed your Personal Data.
- **Deletion:** You may have the right to request that we delete the Personal Data that we have collected about you.
- **Correction**: You may have the right to request that we correct any inaccurate Personal Data we have collected about you.
- **Portability:** You may have the right to request a copy of your Personal Data in a machine-readable format, to the extent technically feasible.
- **Withdrawal of Consent**: If we are processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have to then provide express consent on a case-by-case basis for the use or disclosure of certain of your Personal Data, if such use or disclosure is necessary to enable you to utilize some or all of our Services.
- **Right to Restrict Processing.** You may have the right to restrict the processing of your Personal Data from further use (e.g., if the accuracy of the information is disputed).
- **Right to Object to Processing.** You have the right to object to the processing of your Personal Data at any time.
- **Right to Decline Automated Decision Making.** You have the right to object to decisions involving the use of your Personal Data, which have been taken solely by automated means. Please note, we do not make any eligibility or employment decisions or recommendations based solely on automated means. Each eligibility or employment decision or recommendation that produce legal or similarly significant effects is made with human involvement.

To exercise the rights described in this Privacy Policy, you or your Authorized Agent (if applicable and as defined below), must send us a request that (1) provides sufficient information

to allow us to verify that you are the person about whom we have collected Personal Data (such as your Contact or Profile Data), and (2) describes your request in sufficient detail to allow us to understand, evaluate and respond to it.

Each request that meets both of these criteria will be considered a "Valid Request." We may not respond to requests that do not meet these criteria. We will only use Personal Data provided in a Valid Request to verify your identity and complete your request. You do not need an account to submit a Valid Request.

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

We will not discriminate against you for exercising your rights under applicable privacy laws. We will not deny you our services, charge you different prices or rates, or provide you a lower quality of service if you exercise your rights under applicable privacy laws.

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

If you wish to exercise any of these rights, or have any questions about this section or whether any of the following rights apply to you, please call us at 800-214-1467, or click on the Privacy Rights link on our website.

Storage and Transfers of Personal Data

Depending upon the specific Service you engage with, we host and store Personal Data in the United States ("U.S.") and the European Union ("EU"). The laws of these jurisdictions may differ from the laws where you reside. By using the Services, you acknowledge that any Personal Data about you, regardless of whether provided by you or obtained from a third party, is being provided to Findem in the U.S. and the EU and will be hosted on U.S. and EU servers, and you authorize Findem to transfer, store and process your information to and within both the U.S. and EU and possibly other countries. In some circumstances, your Personal Data may be transferred to the U.S. subject to a data processing agreement incorporating standard data protection clauses as well as other appropriate safeguards, including a transfer impact assessment, where necessary.

Modifications to our Privacy Policy

As we continually work to improve our Services, we may need to change this Privacy Policy from time to time. Upon such changes, we will alert you to any such changes by placing a notice on the Findem website, in the Platform, or by sending you an email and/or by some other means. Please note that if you've opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the

Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes.

Contact Information

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Data or your choices and rights regarding such collection and use, please do not hesitate to contact us at:

- 800-214-1467
- https://www.findem.ai
- 702 Marshall Street, Redwood City, CA 94063

If you are located in the EU or UK, you may use the following information to contact our Data Protection Officer and our EU or UK-Based Member Representative:

- European Union Representative: George Barry, 4 St Christopher's Rd, Montenotte, Cork, T23 E9TR, Ireland
- UK Representative: S. Alec Lawton, Graigwen, Plasycoed road, Pontypool Torfaen, NP4 6QH, UK

Additional Rights for US Residents

In addition to the rights described in the "Your Privacy Rights" section above, depending upon the state in which you reside, you may have the following rights:

- **Right to opt-out of the "Sale" or "Sharing" of your Personal Data.** You may have the right to opt-out of the "sale" or "share" of your Personal Data for targeted advertising purposes. Over the past 12 months, we have "sold" or "shared" (as defined by state privacy laws) the categories of Personal Data we collect regarding Copilot Candidates, Verification Platform users, and Network Platform users (excluding Gender and Ethnicity Data, as detailed above) to Business Partners for the business and commercial purpose of helping organizations identify both internal and external candidates for employment.
- **Targeted Advertising.** You have the right to object to any targeted advertising.

In certain circumstances, if we refuse to take action on your request within a reasonable period of time after receiving your request in accordance with this section, you may appeal our decision. In such appeal, you must (1) provide sufficient information to allow us to verify that you are the person about whom the original request pertains and to identify the original request, and (2) provide a description of the basis of your appeal. Please note that your appeal will be subject to your rights and obligations afforded to you under the State Privacy Laws (as applicable). We will respond to your appeal within the time period required under the applicable law. You can submit a Verified Request to appeal by the following methods:

- Call us at: 800-214-1467

If we deny your appeal, you have the right to contact the Attorney General of your State.

Public disclosures: The Delete Act of 2023, SB 362

- Total data subject requests received in 2025: 418,096
- Data subject requests actioned in whole or in part in 2025: 81,481
- Data subject requests denied in 2025: 4
    - Requests denied because they were not verifiable: 0
    - Requests denied because they were not made by (or properly authorized by) a consumer: 4
    - Requests denied because they called for information exempt from deletion: 0
        - Deletion requests denied under California Civil Code section 1798.145: 0
        - Deletion requests denied under California Civil Code section 1798.146: 0
    - Requests denied on other grounds: 0
- Data subject requests received in 2025 for which Findem did not possess Personal Data relating to the requestor: 336,611
- Median days to respond to data subject requests in 2025: 0.6
- Mean days to respond to data subject requests in 2025: 2.8

Additional Rights for UK and EU Residents

In addition to the rights described in the "Your Privacy Rights" section above, UK and EU residents also have the following rights:

- **Right to File Complaint**: EU residents have the right to lodge a complaint about Findem's practices with respect to your Personal Data with the supervisory authority of your country or EU Member State. A list of Supervisory Authorities is available here: https://edpb.europa.eu/about-edpb/board/members_en. For UK residents, you may contact the Information Commissioner's Office ("ICO") at https://ico.org.uk
- **Right to Post-Mortem Control of Your Personal Data**: French residents have the right to establish guidelines for the preservation, the deletion and the transmission of Personal Data after your death in accordance with article 85 of the Act No 78-17 of 6 January 1978 on Information, Technology, Data Files and Civil Liberties, if and when applicable.

We will respond to your request without undue delay and in any event within one month of receipt, which may be extended by two further months where necessary, taking into account the complexity and number of requests, in which case we will inform you of any such extension within one month of receipt of the request.

You may use the following information to contact our Data Protection Officer or our EU or UK-Based Member Representative:

- **European Union Representative:** George Barry, 4 St Christopher's Rd, Montenotte, Cork, T23 E9TR, Ireland
- **UK Representative:** S. Alec Lawton, Graigwen, Plasycoed Road, Pontypool Torfaen, NP4 6QH, UK

Data Controller: The data controller of the information collected pursuant to this policy is Findem, Inc., a California Corporation whose registered office is located at: 702 Marshall Street, Suite 520, Redwood City CA 94063.