

# **ONLINE PRIVACY POLICY**

UniqueHR (the “**Company**” or “**we**”) has developed this privacy policy out of respect for the privacy of our customers and visitors to our website. This policy describes the personal information we collect, use, and disclose about individual consumers who visit or interact with this website, inquire about any of our products or services, contract with us to provide services, or otherwise interact or do business with us.

Whenever you visit our website, we will collect some information from you automatically simply by you visiting and navigating through this site, and some voluntarily when you submit information using a form on the website, request information, or use any of the other interactive portions of our website. Through this website, we will collect information that can identify you and/or your activity.

This policy does **not** apply to our current and former worksite employees and their family members, dependents, and beneficiaries; if you are a California resident who is a current or former worksite employee of the Company or a family member, dependent, or beneficiary of any of our current or former worksite employees, you may request access to our Worksite Employee Privacy Policy by sending an email to [privacy@uniquehr.com](mailto:privacy@uniquehr.com).

## **Collection of Personal Information and Sensitive Personal Information**

Based on your specific interactions with us or our website, we will or may collect, and we have in the last 12 months collected, the following categories of personal information about you. For each category of information, we provide some examples to explain the category, but we may not have collected all the examples. For each category, we identify the categories of third parties and service providers to whom we have disclosed the information in the last 12 months by reference to a letter that coincides with the letter in the list of categories of service providers and third parties that follows soon after this table.

<b>Category</b>	<b>Examples</b>	<b>Disclosed in Last 12 Months To</b>
Personal Identifiers & Contact Information	Name, mailing address, email address, phone number.	A, B, C
Employment Information	When submitting inquiries through forms on the website, individuals may provide their company or business name and job title.	A, B
Internet Activity	Date and time of your visit to this website; webpages visited; links clicked on the website; browser ID; browser type; device ID; operating system; form information downloaded; domain name from which our site was accessed; search history; and cookies.	B, C
Geolocation Data	IP address.	A, B, C
Mobile Device Data	Information collected when you navigate, access, or use any of our website via mobile device.	A, B, C

Category	Examples	Disclosed in Last 12 Months To
Inferences	Based on analysis of your activity on the website, we may develop inferences regarding your interest in our services.	A, B

**We may share your personal information with the following categories of service providers or third parties depending on your activity on our website:**

- A. Marketing support vendors and vendors that support managing or hosting the website
- B. Data analytics vendors
- C. Our service providers acting on our behalf

Personal information *does not* include:

- Publicly available information from government records.
- Information that a business has a reasonable basis to believe is lawfully made available to the general public by the consumer, independent contractor, or applicant, or from widely distributed media.
- Information made available by a person to whom the consumer, independent contractor, or applicant has disclosed the information if the consumer, independent contractor, or applicant has not restricted the information to a specific audience.
- Deidentified or aggregated information.

**We may collect your personal information for the following business purposes:**

1. To fulfill or meet the purpose for which you provided the information.
2. To respond to inquiries submitted through the Website, including through the “Contact Us” page.
3. To respond to consumer requests in compliance with applicable law.
4. To provide interest-based and targeted advertising.
5. To contact you by email, telephone calls, mail, or other equivalent forms of communication regarding informative communications related to the functionalities, services, or other information you requested or asked the Company to provide to you.
6. To improve user experience on our website.
7. To understand the demographics of our website visitors.
8. To detect security incidents.
9. To debug, identify, and repair errors that impair existing intended functionality of our website.
10. To protect against malicious or illegal activity and prosecute those responsible.
11. We may produce reports on Website traffic or usage patterns and share these reports with our business partners and others, but the information contained in these reports is anonymous and does not allow identification of any specific individual or entity. Similarly, we may from time to time share aggregated information and data that do not identify any particular individual or entity with third parties.

**We may collect your personal information from the following sources:**

- You the website viewer may voluntarily submit information through forms on the website.
- We utilize cookies to automatically collect information about our website visitors.

We do **NOT** and will not sell your personal information in exchange for monetary consideration.

## **Retention of Personal Information**

In deciding how long to retain each category of personal information that we collect, we consider many criteria, including, but not limited to: the business purposes for which the Personal Information was collected; relevant federal, state and local recordkeeping laws; applicable statutes of limitations for claims to which the information may be relevant; and legal preservation of evidence obligations.

We apply our data retention procedures on an annual basis to determine if the business purposes for collecting the personal information, and legal reasons for retaining the personal information, have both expired. If so, we will purge the information in a secure manner.

## **Third Party Vendors**

We may use other companies and individuals to perform certain functions on our behalf. Examples include administering e-mail services and running special promotions. Such parties only have access to the personal information needed to perform these functions and may not use or store the information for any other purpose. Subscribers or site visitors will never receive unsolicited e-mail messages from vendors working on our behalf.

## **Business Transfers**

In the event we sell or transfer a particular portion of its business assets, consumer information may be one of the business assets transferred as part of the transaction. If substantially all of our assets are acquired, consumer information may be transferred as part of the acquisition.

## **Compliance with Law and Safety**

We may disclose specific personal based on a good faith belief that such disclosure is necessary to comply with or conform to the law or that such disclosure is necessary to protect the users of our website, the site itself, or the public.

## **Use of Cookies and Other Tracking Technologies**

Cookies are small files that a website may transfer to a user's computer that reside there for either the duration of the browsing session (session cookies) or on a permanent, until deleted, basis (persistent cookies) that may be used to identify a user, a user's machine, or a user's behavior. We make use of cookies under the following circumstances and for the following reasons:

- Provide you with services available through the website and to enable you to use some of its features
- Authenticate users and prevent fraudulent use of user accounts
- Identify if users have accepted the use of cookies on the website
- Compile data about website traffic and how users use the website to offer a better website experience
- Understand and save visitor preferences for future visits, such as remembering your login details or language preference, to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you use the website

- Track your browsing habits to enable us to show advertising which is more likely to be of interest to you, including advertising by third parties on our website

You may delete cookies from your web browser at any time or block cookies on your equipment, but this may affect the functioning of or even block the website. You can prevent saving of cookies (disable and delete them) by changing your browser settings accordingly at any time. It is possible that some functions will not be available on our website when use of cookies is deactivated. Check the settings of your browser. Below you can find some guidance:

- [Safari](#)
- [Opera](#)
- [Internet Explorer](#)
- [Google Chrome](#)
- [Mozilla](#)

Do Not Track (DNT) is a privacy preference that users can set if they do not want web services to collect information about their online activity. However, there is currently no universal standard for sending and receiving DNT signals. Due to this lack of universal standard, it would be impossible for us to promise that we comply with all known and unknown DNT standards.

Therefore, we do not respond to DNT signals or other mechanisms that provide a choice regarding the collection of personal information about activities over time and across different Web sites or online services. If a universal standard for DNT becomes available, we may revisit our DNT Policy.

## **External Links**

Our website contains links to other sites. We are not responsible for the privacy practices or the content of such websites. To help ensure the protection of your privacy, we recommend that you review the Privacy Policy of any site you visit via a link from our website.

## **Children Under the Age of 16**

Our website is not intended for children under 16 years of age. No one under age 16 may provide any personal information on the website. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on our website. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at the email address below.

## **How We Protect the Information that We Collect**

The protection of the information that we collect about visitors to this website is of the utmost importance to us and we take every reasonable measure to ensure that protection, including:

- We keep automatically collected data and voluntarily collected data separate at all times.
- We use internal encryption on all data stores that house voluntarily captured data.
- We use commercially reasonable tools and techniques to protect against unauthorized access to our systems.
- We restrict access to private information to those who need such access in the course of their duties for us.

However, we cannot and do not guarantee that any such submissions or information will be totally secure. Unencrypted Internet communications are not secure, and no security measures are impenetrable.

## **International Visitors**

We do not target, market to, or offer our products or services to consumers outside of the United States. You agree not to submit your personally identifiable information through the website if you reside outside the United States.

## **Rights Under the CCPA and CPRA**

This section of the Privacy Policy applies only to California residents who are natural persons. If you are a California resident, you have the following rights pursuant to the California Consumer Privacy Act (CCPA) as amended by the California Privacy Rights Act (CPRA):

1. **Right to Know**. The right to request, up to 2 times in a 12-month period, that we identify to you (1) the categories of personal information we have collected about you going back to January 1, 2022, unless doing so would be impossible or involve disproportionate effort, or unless you request a specific time period, (2) the categories of sources from which the personal information was collected, (3) the business or commercial purpose for collecting, or sharing this information, (4) the categories of third parties with whom we share or have shared your personal information, (5) the categories of personal information that we have sold or shared about you and the categories of third parties to whom the personal information was sold or shared, by category or categories of personal information for each category of third parties to whom the personal information was sold or shared, and (6) the categories of personal information that we have disclosed about you for a business purpose and the categories of persons to whom it was disclosed for a business purpose;
2. **Right to Access**. The right to request, up to 2 times in a 12-month period, that we disclose to you, free of charge, the specific pieces of personal information we have collected about you going back to January 1, 2022, unless doing so would be impossible or involve disproportionate effort, or unless you request a specific time period;
3. **Right to Delete**. The right to request, up to 2 times in a 12-month period, that we delete personal information that we collected from you, subject to certain exceptions;
4. **Right to Correct**. The right to request that we correct inaccurate personal information (to the extent such an inaccuracy exists) that we maintain about you;
5. **Right to Opt-Out**. The right to opt-out of the sharing of your personal information to third parties;
6. The right to designate an authorized agent to submit one of the above requests on your behalf. See below for how you can designate an authorized agent; and
7. The right to not be discriminated or retaliated against for exercising any of the above rights, including an applicant's and independent contractor's right not to be retaliated against for exercising the above rights.

**You can submit any of the above types of consumer requests through any of the 2 options below:**

1. Submit a request to [privacy@uniquehr.com](mailto:privacy@uniquehr.com).
2. Call our privacy toll-free line at 866-775-4357.

3. Click [HERE](#) to be taken to an online opt-out submission form.

### **How We Will Verify That it is Really You Submitting the Request**

If you are a California resident, when you submit a Right to Know, Right to Access, Right to Delete, or Right to Correct request through one of the methods provided above, we will ask you to provide some information in order to verify your identity and respond to your request. Specifically, we will ask you to verify information that can be used to link your identity to particular records in our possession, which depends on the nature of your relationship and interaction with us.

### **Responding to Your Right to Know, Right to Access, Right to Delete, and Right to Correct Requests**

Upon receiving a verifiable request from a California resident, we will confirm receipt of the request no later than 10 business days after receiving it. We endeavor to respond to a verifiable request within forty-five (45) calendar days of its receipt. If we require more time (up to an additional 45 calendar days, or 90 calendar days total from the date we receive your request), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

We do not charge a fee to process or respond to your verifiable request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

For a request to correct inaccurate personal information, we will accept, review, and consider any documentation that you provide, and we may require that you provide documentation to rebut our own documentation that the personal information is accurate. You should make a good-faith effort to provide us with all necessarily information at the time that you make the request to correct. We may deny a request to correct if we have a good-faith, reasonable, and documented belief that a request to correct is fraudulent or abusive. If we deny your request to correct, we shall inform you of our decision not to comply and provide an explanation as to why we believe the request is fraudulent.

### **Responding to Your Request to Opt-Out of the Sharing of Your Personal Information**

We will act upon a consumer request to opt-out within fifteen (15) days of its receipt. We will notify all third parties to whom we have shared personal information of your request and instruct them to comply with the request within the same time frame. We will notify you when this has been completed by mail or electronically, at your option.

A request to opt-out need not be a verifiable consumer request. However, we may deny a request to opt-out if we have a good faith, reasonable, and documented belief that a request to opt-out is fraudulent. If we deny your request to opt-out, we shall inform you of our decision not to comply and provide an explanation as to why we believe the request is fraudulent.

### **If You Have an Authorized Agent:**

If you are a California resident, you can authorize someone else as an authorized agent who can submit a request on your behalf. To do so, you must either (a) execute a valid, verifiable, and notarized power of attorney or (b) provide other written, signed authorization that we can then verify. When we receive a request submitted on your behalf by an authorized agent who does not have a power of attorney, that person will be asked to provide written proof that they have your permission to act on your behalf, and we will also contact you and ask you for information to verify your own identity directly with us and not through your authorized

agent. We may deny a request from an authorized agent if the agent does not provide your signed permission demonstrating that they have been authorized by you to act on your behalf.

### **Other California Privacy Rights**

The California Civil Code permits California Residents with whom we have an established business relationship to request that we provide you with a list of certain categories of personal information that we have disclosed to third parties for their direct marketing purposes during the preceding calendar year. To make such a request, please send an email to [privacy@uniquehr.com](mailto:privacy@uniquehr.com), or write to us at the address listed below. Please mention that you are making a “California Shine the Light” inquiry.

## **Consent to Terms and Conditions**

By using this website, you consent to all terms and conditions expressed in this Privacy Policy.

## **Changes to Our Privacy Policy**

As our services evolve and we perceive the need or desirability of using information collected in other ways, we may from time to time amend this Privacy Policy. We encourage you to check our website frequently to see the current Privacy Policy in effect and any changes that may have been made to them. If we make material changes to this Privacy Policy, we will post the revised Privacy Policy and the revised effective date on this website. Please check back here periodically or contact us at the email address listed at the end of this Privacy Policy.

## **Consumers With Disabilities**

This policy is in a form that is accessible to consumers with disabilities.

## **Questions About the Policy**

This website is owned and operated by UniqueHR. If you have any questions about this Privacy Policy, please contact us at [privacy@uniquehr.com](mailto:privacy@uniquehr.com) or call 866-775-4357.

***\*\*This policy was last updated June 14, 2023.***