

PRIVACY POLICY

LAST UPDATED: OCTOBER 2022

PandoLogic, Inc. (“**PandoLogic**”, “**we**”, “**us**” and “**our**”) is aware of the sensitive nature of employment information and is committed to providing its users with high standards of online security and privacy protection. The following Privacy Policy presents our online data collection and usage policies and practices and applies to our websites(pandologic.com, www.pandoiq.com, www.thejobnetwork.com, www.select.pandoiq.com, www.pandoselect.com and www.talent.wendy.ai – collectively, the “**Sites**”) and the information provided by users of our dashboard (collectively, the “**Service**”).

PandoLogic is a subsidiary of Veritone, Inc. For information regarding how Veritone, Inc. processes your personal information, please review its [privacy policy](#).

[A PDF version of this Privacy Policy can be found here.](#)

Collection and Use of Personal Information We may collect one or more of the following categories of personal information about the visitors to our Sites and users of our Service when these individuals (i) visit our Sites; (ii) register for or request additional about our Service, including those who register for our Service as an employer or recruiter; (iii) contact us; or (iv) otherwise interact with us via our Sites or Service.

Category of Personal Information Collected	Personal Information Collected	Sources of Personal Information	Business Purpose for Collection of Personal Information
Identifiers	Name (first and last), email address, IP address, resume information, company name, username, password, other profile/resume information.	Directly from you when you register for our Service (including as an employer or recruiter) or apply for jobs; cookies and other tracking technologies; publicly-available sources.	To provide our Service; to contact you regarding our Service, your account or other products or services available from our affiliates, including our parent company; identification, security and legal, compliance and regulatory obligations.
Protected characteristics under California or federal law	Race, color, national origin, citizenship, sex, age, medical condition, physical or mental	Directly from your when you register for our Service or apply for jobs.	To provide our Service; identification, security and legal, compliance and regulatory obligations.

	disability, veteran or military status.		
Personal Information Categories listed in the California Customer Records Statute (Cal. Civ. Code § 1798.80(e))	Name, telephone number, address, financial information, employment history, education.	Directly from you when you register for our Service (including as an employer or recruiter) or apply for jobs; publicly-available sources.	To provide our Service; to contact you regarding our Service, your account or other products or services available from our affiliates, including our parent company; identification, security and legal, compliance and regulatory obligations.
Internet or Other Electronic Network Activity Information	Your use of the Service and the areas of our Sites that you visit.	Cookies and other tracking technologies.	To improve and enhance our Service and Sites, security, legal, compliance and regulatory obligations.
Geolocation Data	Physical location, including device location, IP address.	Cookies and other tracking technologies.	To provide our Service; security, legal, compliance and regulatory obligations.
Commercial Information	Your transaction history with us.		To provide our Service; to contact you regarding our Service, your account or other products or services available from our affiliates, including our parent company; identification, security and legal, compliance and regulatory obligations.
Professional or employment-related information	Current or past job history or performance evaluations, employment skills, other profile/resume information.		To provide our Service; identification, security and legal, compliance and regulatory obligations.
Inferences drawn from other personal information	Profile information reflecting your employment preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes and your potential to be successful in a particular	Directly from you when you register for or use our Service; from publicly-available sources, such as your social media profiles; our AI-driven capabilities.	To provide our Service; including to match you with potential jobs and employment opportunities or brands, and to evaluate your potential success with a particular employer; identification.

	role/your compatibility with a role or job.		
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Aggregate Information: We may collect certain information about you, including your aggregated usage information which includes navigational and clickstream data that shows what pages are visited and technical information transmitted by your device, including certain software and hardware information (e.g., the type of browser and operating system your device uses, language preference, access time, etc.), in order to enhance the functionality of our Service.

Cookies: We use cookies and other technologies in our related services, including when you visit our Sites or access our Service. For more information, please see our [Cookie Policy](#). You may remove the cookies by following the instructions of your device preferences. You can find more information about cookies at www.allaboutcookies.org; however, if you choose to disable cookies, some features of our Sites and Service may not operate properly and your online experience may be limited.

Data We Do Not Collect: We do not collect the following categories of personal information through the Sites or the Service described in this Privacy Policy: biometric information; education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99); audio, electronic, visual, thermal, olfactory or similar information. If we ever need to collect any of these categories of data, we will notify you and, where required, ask for your consent.

Use of Personal Information

We may use your personal information to:

- Provide you with our Sites and Service;
- Contact you about new products or services offered by us, including our parent company, or our affiliated sites;
- To further develop and generally improve the Sites and the Service;
- To perform research or to conduct anonymous analytics in order to improve and customize our Service to your needs and interests;
- To support and troubleshoot our Service and to respond to your queries;
- To investigate violations and enforce our policies, and as required by law, regulation or other governmental authority, or to comply with a subpoena or similar legal process or respond to a government request; and

- To comply with legal obligations as well as to investigate and prevent fraudulent transactions, unauthorized access to our Service, and other illegal activities.

Disclosures of Personal Information

In order to provide our Service, including to provide you with the broadest exposure to potential employment opportunities, we may share your personal information with the following categories of recipients:

- Our business partners, including with the businesses to whom you submit your job application subject to your consent and related third parties who may contact you about their products or services.
- Our affiliates, including other PandoLogic-affiliated companies and websites powered by PandoLogic and our parent company, Veritone, Inc.
- Our service providers, including those who work to enhance our Sites or Service and those who protect the security of our systems.
- Legal or regulatory authorities, including when we must respond to a subpoena or court order, judicial process, or regulatory inquiry, when we must defend against fraud, lawsuits, claims or other liabilities; and when we must prevent physical harm or financial loss in connection with any suspected or actual illegal activity.
- Business transferees, including as part of a merger, acquisition, bankruptcy, or other transaction in which a third-party assumes control of all or part of PandoLogic.

Sale of Personal Information: We may also sell, defined according to the California Consumer Privacy Act (“CCPA”), as amended by the California Privacy Rights Act (“CPRA”), definition as the selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s personal information by the business to a third party for valuable consideration, your personal information. This means that we may have received some kind of benefit in return for sharing your personal information, but not necessarily a monetary benefit.

We may sell and may have sold in the past twelve (12) months the following categories of personal information:

- Identifiers
- Personal Information Categories listed in the California Customer Records Statute (Cal. Civ. Code § 1798.80(e))
- Professional or employment-related information

Please note that we do not knowingly sell the personal information of any individuals under the age of 16.

Cross-Border Data Transfers

We may transfer your personal information to a third party that is located in a jurisdiction other than the one from which we collected your personal information, including to countries that have not been deemed to have an adequate level of protection for the rights and freedoms of data subjects. If we do transfer your personal information to another jurisdiction, we will do so following due diligence and provided that the data recipient is subject to contractual agreements imposing obligations on it to ensure appropriate technical and organizations are implemented and maintained at all times to prevent the unauthorized and unlawful processing of personal information, and the accidental loss or destruction of, or damage to, personal information, consistent with our obligations under applicable data protection laws.

Retention of Personal Information

We will only retain your personal information for as long as necessary to fulfill the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory, accounting, or reporting requirements.

Security of Personal Information

The security of all personal information provided to us is important and we take reasonable steps designed to protect your personal information. We maintain reasonable administrative, technical, and physical safeguards designed to protect personal information that we receive against accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure or use.

Your Choices & Rights

Depending upon where you are located, certain choices and rights may be available to you under applicable data protection laws, including the right to request access to your personal information or to have your personal information deleted. If you have questions about what rights may apply to you, please contact us at support@pandologic.com.

Do Not Track: Our websites and apps are not designed to respond to "do not track" requests from browsers.

For California Residents:

"Shine the Light" and "Eraser" Laws: Residents of the State of California may request a list of all third parties to which we have disclosed certain information during the preceding year for those third parties' direct marketing purposes.

The ***California Consumer Privacy Act ("CCPA"), as amended by California Privacy Rights Act ("CPRA")*** provides California residents and/or their authorized agents with specific rights regarding the collection and storage of their personal information.

Your Right to Know: California residents have the right to request that we disclose the following information to you about our collection and use of your personal information over the past twelve (12) months. We may ask

you to provide certain information to identify yourself so that we may compare it with our records in order to verify your request. Upon verification, we will disclose to you:

1. The categories of personal information we have collected about you.
2. The categories of sources for the personal information we have collected about you.
3. The specific pieces of personal information we have collected about you.
4. Our business or commercial purpose for collecting or selling your personal information.
5. The categories of third parties to whom we have sold or shared your personal information, if any, and the categories of personal information that we have shared with each third-party recipient.

Your Right to Opt-Out of Sale or Sharing of Personal Information: California residents have the right to opt-out of the sale or sharing of their personal information by submitting a request using the information in the “Contact Us” section below. After you opt-out, we may continue to share some personal information with our partners (who will function as our service providers in such instance) to help us perform business-related functions such as, but not limited to, providing the Service, ensuring that the Service is working correctly and securely, providing aggregate statistics and analytics and/or preventing fraud. If you access the Service from other devices or browsers, visit the links below from those devices or browsers to ensure your choice applies to the personal information collected when you use those devices or browsers. Additionally, although clicking the “Do Not Sell My Personal Information” link will opt you out of the sale or sharing of your personal information for advertising purposes, it will not opt you out of the use of previously collected and sold personal information or all interest-based advertising.

If you would like more information about how to opt-out of interest-based advertising in desktop and mobile browsers on a particular device, please visit <http://optout.aboutads.info/#/> or <http://optout.networkadvertising.org/#>. You may also download the AppChoices app at <http://www.aboutads.info/appchoices> to opt-out in connection with mobile apps or use the platform controls on your mobile device to opt-out.

We do not knowingly sell the personal information of any individuals under the age of 16.

Where we are sharing your personal information with third parties for the purposes of cross-context behavioral advertising or profiling, you may opt-out of such sharing at any time by submitting a request as directed on the homepage of our website or by contacting us using the information in the “Contact Us” section below.

Your Right to Limit Use of Sensitive Personal Information: California residents have the right to request that we limit our use of any sensitive personal information to those uses which are necessary to perform the Services or for other specifically-enumerated business purposes under the CCPA, as amended by the CPRA.

Your Right to Delete: California residents have the right to request that we delete any of the personal information collected from you and retained by us, subject to certain exceptions. We may ask you to provide certain information to identify yourself so that we may compare it with our records in order to verify your request. Once your request is verified and we have determined that we are required to delete the requested personal information in accordance with the CCPA, we will delete, and direct our third-party service providers to delete, your personal information from their records. Your request to delete personal information that we have collected may be denied if we conclude it is necessary for us to retain such personal information under one or more of the exceptions listed in the CCPA.

Your Right to Correct: Under the CCPA, as amended by the CPRA, California residents have the right to request that we correct any inaccurate personal information we maintain about you, taking into account the nature of the personal information and the purposes for which we are processing such personal information. We will use commercially reasonable efforts to correct such inaccurate personal information about you.

Non-Discrimination: You will not receive any discriminatory treatment by us for the exercise of your privacy rights conferred by the CCPA.

Verifying Your Request: Only you, or a person that you authorize to act on your behalf, may make a request related to your personal information. In the case of access and deletion, your request must be verifiable before we can fulfill such request. Verifying your request will require you to provide sufficient information for us to reasonably verify that you are the person about whom we collected personal information or a person authorized to act on your behalf. We will only use the personal information that you have provided in a verifiable request in order to verify your request. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority. Please note that we may charge a reasonable fee or refuse to act on a request if such request is excessive, repetitive or manifestly unfounded.

FOR INDIVIDUALS LOCATED IN THE EUROPEAN ECONOMIC AREA (EEA), UNITED KINGDOM (UK) OR SWITZERLAND:

YOU HAVE A NUMBER OF RIGHTS UNDER APPLICABLE DATA PROTECTION LAWS IN RELATION TO YOUR PERSONAL INFORMATION. UNDER CERTAIN CIRCUMSTANCES, YOU HAVE THE RIGHT TO:

- Have access to your personal information by submitting a request to us;
- Have your personal information deleted;
- Have your personal information corrected if it is wrong;
- Have the processing of your personal information restricted;
- Object to further processing of your personal information, including to object to marketing from us;
- Make a data portability request;
- Withdraw any consent you have provided to us;
- Restrict any automatic processing of your personal information; and
- Complain to the appropriate Supervisory Authority.

To exercise any of these rights, please contact us as outlined in the “Contact Us” section below.

Third-Party Links

We may provide links to other websites or resources provided by third parties. These links are provided for your convenience only. We have no control over the content of those websites or resources and accept no responsibility for them or for any loss or damage that may arise from your use of them. If you decide to access of the third-party links on the Sites, you do so entirely at your own risk and subject to the terms and conditions of those websites.

Age Limitation

Our Sites and the Service are not intended to be used by individuals under the age of 18, and we do not knowingly collect personal information from children under 18. We encourage parents and legal guardians to monitor their children’s internet usage and to help enforce our Privacy Policy by instructing their children to never provide us with personal information. If we become aware that a child under the age of 18 has provided us with personal information, we will take steps to delete such information. If you become aware that a child has provided us with personal information, please contact us at support@pandologic.com.

Changes to Our Privacy Policy

This Privacy Policy is effective as of the date stated at the top of this page. We may change this Privacy Policy from time to time. By accessing and use our Sites and the Service after we notify you of such changes to this Privacy Policy, you are deemed to have accepted such changes. Please refer back to this Privacy Policy on a regular basis.

Contact Us

If you have any questions concerning this Privacy Policy, you are welcome to contact us by:

- Privacy Contact Form: <https://pandologic.com/privacy-contact/>.
- Email: support@pandologic.com
- Contact details: 750 Lexington Ave., 6th Floor, New York, NY 10022
- (212) 419-4649