

PRIVACY POLICY

Click Boarding, LLC owns the <https://accesstalenthub.com> site and <https://clickboarding.com> (the "Site"), and hosts the Client Data uploaded to it. (Click Boarding, LLC is referred to herein as "Click," "we," or "our".) Capitalized terms not defined herein shall have the definition provided in the Master Services Agreement executed between Click and the Subscriber you are affiliated with.

As used in this Policy, the term "**Personal Information**" means the information in the possession of Click that reasonably relates to you. This privacy policy ("Policy") is written for the organization or company that contracts with us (our "Subscriber"). All references to "you" or "your" in this Policy are to our Subscribers, who in turn, may administer their online services to their end users.

PURPOSE FOR COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

Click collects, uses and discloses Personal Information in providing the Site for the following purposes:

- Providing services to our Subscribers under the Subscription Service;
- Enhancing and improving the services we provide our Subscribers;
- Developing new functionality to offer to our Subscribers;
- Establishing and maintaining communications with you and the Subscriber you work with;
- Meeting legal, security, processing and regulatory requirements;
- Ensuring the terms of the Master Service Agreement are complied with;
- Establishing, enforcing, or defending legal claims;
- Protecting against fraud, suspicious or other illegal activities; and
- Compiling statistics for analysis of the Sites and our business.

We do not use Personal Information, or derive information from Personal Information, for any cross contextual behavioral advertising. Nor do we sell any Personal Information subject to this Policy as defined in the relevant and applicable state law.

INFORMATION WE COLLECT/GENERATE

The information gathered and/or generated by Click, its affiliates, or its service providers (collectively the "Click Parties") about you falls into two categories: (1) information voluntarily supplied by you when you visit the Site; and (2) navigational information gathered as visitors use the Site.

1. Information voluntarily provided by you

When using the Site, you may choose to provide Click Parties with information to help facilitate in providing the sServices. The Personal Information that we collect is generally limited to:

- Name of Subscriber
- Name
- Department
- Position
- Contact information (e.g. email address, phone number, etc.)
- Access or authorization credentials for Subscriber systems

Click does not collect sensitive personal information, as defined by applicable state law, from you.

2. Website Navigational Information

As you navigate the Site, we may also collect information through the use of commonly-used information-gathering tools, such as cookies and web beacons (collectively "Website Navigational Information").

Website Navigational Information includes standard information from your web browser (such as browser type and browser language), your Internet Protocol ("IP") address, and the actions you take on the Site (such as the web pages viewed and the links clicked), embedded scripts, and entity tags (ETags).

• Cookies

Like many companies, we may use cookies on the Site. Cookies are pieces of information shared between your web browser and a website. Use of cookies enables a faster and easier experience for the user. A cookie cannot read data off your computer's hard drive. There are different kinds of cookies with different functions:

Session cookies: These are only stored on your computer during your web session. They are automatically deleted when the browser is closed. They usually store an anonymous session ID allowing

you to browse a website without having to log in to each page. They do not collect any information from your computer.

Persistent cookies: A persistent cookie is one stored as a file on your computer, and it remains there when you close your web browser. The cookie can be read by the website that created it when you visit that website again.

First-party cookies: The function of this type of cookie is to retain your preferences for a particular website for the entity that owns that website. They are stored and sent between an Click Party's servers and your computer's hard drive. They are not used for anything other than for personalization as set by you. These cookies may be either Session or Persistent cookies.

Third-party cookies: The function of this type of cookie is to retain your interaction with a particular website for an entity that does not own that website. They are stored and sent between the third-party's server and your computer's hard drive. These cookies are usually Persistent cookies.

We use generally cookies as follows:

Functionality

These cookies allow our Sites to remember choices you make (such as your user name, language or the region you are in) and provide enhanced features. For instance, the Site may be able to remember your log in details, so that you do not have to repeatedly sign in to your account when using a particular device to access our Sites. These cookies can also be used to remember changes you have made to text size, font and other parts of web pages that you can customize. They may also be used to provide services you have requested such as viewing a video or commenting on an article. The information these cookies collect is usually anonymized. They do not gather any information about you that could be used for advertising or remember where you have been on the internet.

Performance

These cookies collect information about how visitors use the Site, for instance which pages visitors go to most often, and if they get error messages from web pages. They also allow us to record and count the number of visitors to the Site, all of which enables us to see how visitors use the Site in order to improve the way that the Site works. The information these cookies collect is normally anonymous and is used to improve how our Sites works. However, some of these cookies may include Personal Information. Please consult your web browser's 'Help' documentation or visit www.aboutcookies.org. for more information about how to turn cookies on and off for your browser.

Some browsers have attempted to implement the draft "Do Not Track" ("DNT") standard of the World Wide Web Consortium ("W3C"). As this standard has not been finalized, and is not generally accepted in the industry, the Sites are not compatible with DNT. Additionally, since we do not deploy third party cookies for purposes of cross contextual behavioral advertising, the Site does not respond to Global Privacy Control signals, or similar browser settings.

- **IP Addresses**

When you visit our Sites, we collect your Internet Protocol ("IP") addresses to track and aggregate visitor behavior. For example, we use IP addresses to monitor the regions from which users navigate the Sites.

- **Embedded Scripts**

An embedded script is programming code that is designed to collect information about your interactions with the Site, such as the links you click on. The code is temporarily downloaded from our web server (or a third party service provider), is active only while you are connected to the Site, and is deactivated or deleted thereafter.

We use the above technologies (or ones we incorporate in the future) for the purposes set out above or as permitted by law.

Disclosure Of Information To Others

We do not disclose any Personal Information about you to third parties except as stated in this Privacy Policy, as otherwise permitted by law, or as authorized by you.

Third parties to whom we generally disclose information are required by law or a contract with us, to keep your Personal Information confidential and secure, to use and disclose such Personal Information for purposes that a reasonable person would consider appropriate in the circumstances, and for purposes described earlier in this Policy.

Service Providers

We may disclose Personal Information to our Service Providers for any of the purposes stated in this Policy. Because a number of the service providers we use are located in the United States, your Personal Information may be processed and stored inside the United States, and the U.S. government, courts, or

law enforcement or regulatory agencies may be able to obtain disclosure of your Personal Information under US laws. We do not disclose Personal Information to service providers outside the scope of obtaining services from them.

Subscribers

Due to the nature of your relationship with a Subscriber, Click considers your Personal Information a business record of the Subscriber affiliated with you. As such, we may disclose your Personal Information to the Click Subscriber affiliated with you. We will do this for any of the purposes specified in this Policy, as well as upon your request, or upon the Subscriber's request.

Other Legally Required Disclosures

Click reserves the right to disclose, without your prior permission, any Personal Information about you or your use of the Site if Click has a good faith belief that such action is necessary to: (a) protect and defend the rights, property or safety of Click, a Click employee, other users of the Site, or the public; (b) enforce the terms and conditions that apply to use of the Site; (c) as required by a legally valid request from a competent governmental authority; or (d) respond to claims that any content violates the rights of third-parties. We may also disclose Personal Information as we deem necessary to satisfy any applicable law, regulation, legal process, or governmental request.

Should law enforcement contact us with a demand for Personal Information or Client Data, we will attempt to redirect the law enforcement agency to request that data directly from you. If compelled to disclose Personal Information or Client Data to law enforcement, we will promptly notify you and provide you a copy of the demand unless legally prohibited from doing so. If we are compelled by law to delete Personal Information or Client Data, we will promptly comply and, if legally permitted, notify you of such deletion.

State Privacy Rights

Residents of some states in the US have certain rights, under the specific state law, as it relates to how their Personal Information is handled. These are the "right to know," the "right to delete," and the "right to correct." Please note that these rights are not absolute, and are subject to a number of exceptions.

Should we decline any request to exercise a right noted below, we will provide you a explanation of the reason for our declining such request.

Right to Know. You have the right to correct any Personal Information which is manifestly incorrect.

However, Personal Information which is objectively correct, or is merely opinion data, may not be subject to this right. Should you wish to exercise this right, please contact us via one of the methods noted below under "Exercising State Privacy Rights".

Right to Correct. You may request us to provide you the specific pieces of Personal Information that we have about you, categories of Personal Information we have collected about you, categories of sources from which the Personal Information is collected. Please note that much of the information for which you can make a request is already contained in this Policy. Should you wish to exercise this right, please contact us via one of the methods noted below under "Exercising State Privacy Rights".

Right to Delete. Some state law gives its residents a limited right to request deletion of their Personal Information. However, this right is limited by a number of exceptions. Fundamentally, if we have a permissible need to retain Personal Information, we are not under an obligation to delete such information, even when requested. Generally, we retain Personal Information so we may complete the transaction for which the Personal Information was collected, provide information or a service requested by you or the Subscriber affiliated with you, or reasonably anticipated within the context of our ongoing business relationship with you or the Subscriber affiliated with you, or otherwise perform a contract between us and you or the Subscriber affiliated with you; detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity; debug to identify and repair errors that impair existing intended functionality of our online properties; enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us; comply with a legal obligation; or otherwise use your Personal Information, internally, in a lawful manner that is compatible with the context in which you provided the information. As such, we generally do not accept requests to delete Personal Information. However, we will respond to requests to remove Personal Information from some of our systems as a part of a request to close or otherwise disable an account. If you would like to request deletion of Personal Information, please contact us via one of the methods noted below under "Exercising State Privacy Rights." If you do not have an account with us, we may ask for some Personal Information in order to verify your identity and your rights to the data subject to your request.

Right to Opt-Out. We do not sell your Personal Information to unaffiliated third parties.

Designating an Authorized Agent. Some state law permits residents of that state to designate an agent to manage their rights under state law. If you would like to designate an agent to manage your privacy preferences, you may do so using the mechanisms noted below under “Exercising State Privacy Rights.” Note that if you do not have an account with us, we may ask for some Personal Information in order to verify your identity and your rights to the data subject to your request. We will also need sufficient Personal Information about your authorized agent to be able to identify them. As part of this process, you must have permission from your authorized agent to disclose their Personal Information to us for the purpose of acting as your agent.

Non-discrimination. Some state law prohibits discrimination against you because you exercised any your rights under state law, including, but not limited to, by: denying you access to goods or services; charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; providing a different level or quality of goods or services; or suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

Exercising State Privacy Rights. If you are a resident in a state which provides separate privacy rights, and would like to exercise any of your rights, you may do so by contacting us at support@clickboarding.com. Additionally, the Right to Know and Right to Correct may be exercised in the account pages in the Click portal you use to access the Services. Please be aware that we will need to have sufficient information to be able to verify your identity and the rights you have in the data subject to your request.

SAFEGUARDS

We have in place reasonable safeguards appropriate to the sensitivity of the information we maintain. Safeguards will vary depending on the sensitivity, format, location, amount, distribution and storage of the Personal Information. They include physical, technical and managerial measures to keep Personal Information protected from unauthorized access. Note that due to the nature of the Internet and related technology, we cannot absolutely guarantee the security of Personal Information disclosed over the Internet, and Click expressly disclaim any such obligation.

EXTERNAL LINKS

Sites includes links to other websites whose privacy policies we do not control. Once you leave our websites, use of any Personal Information you provide is governed by the privacy policy of the operator of the website you are visiting. That policy may differ from this Policy.

ACCURACY

Our knowing about changes to some of your Personal Information (e.g. email address) may be key to effectively communicating with you at your request. If any of your details change you can update us by e-mailing us at support@clickboarding.com. **Please keep us informed of changes to your Personal Information.**

QUESTIONS

If you have any questions or concerns about how your Personal Information is handled by the Click platform, please let us know by sending an email to support@clickboarding.com.

CHANGES TO THIS PRIVACY POLICY

If there is any material change to your rights under this Policy, Click will provide you with notice of such change 30 calendar days prior to the changes going into effect. As part of this notice, Click may post a notice of the change on the Site in a clear and conspicuous manner for the 30 calendar day notice period. Click may also communicate the change via email or postal mail if this is the way that Click normally corresponds with you. Please note that your continued use of the Site once this 30 calendar day period are over indicates your agreement to the changes which were the subject of the notice.