

## Entelo Privacy Notice

*Last updated: December 18, 2019*

*What changed: We added a reference to “ConveyIQ by Entelo” and described our commitment to the California Consumer Privacy Act (CCPA)*

Entelo, Inc. is a web-based software solution that allows recruiting professionals to recruit faster, smarter and better by using predictive algorithms and data-backed insights, as well as allows employers to interview their job applicants using video and schedule appointments with job applicants and prospective employers. Entelo provides a suite of services including Entelo Platform, Entelo Diversity, Entelo Envoy, and ConveyIQ by Entelo (collectively, “Services”).

We at Entelo know you care about how your personal information is used and shared, and we take your privacy seriously. We gather information about our Users (those that interact with our Website and Services), people who attend our marketing events, and about job Candidates, to provide a better, more focused experience for our Customers and to enhance our business. Our Privacy Notice will help you understand what information we collect and receive at Entelo, how Entelo uses it, and what choices you have.

In this Privacy Notice, personal information (“PI”) means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual. The words “our,” “us,” “we,” and “Entelo” refer to Entelo, Inc., and our affiliates, if any, (which includes any person or entity that controls us, is controlled by us, or is under common control with us, such as our subsidiary (if applicable), parent company (if applicable), or our employees). This Privacy Notice does not cover the practices of companies we don’t own or control.

This Privacy Notice is separated into four sections:

1. The personal information we collect and why we collect it.
2. Who Entelo shares personal information with and why.
3. Cookies. This section describes how we use cookies, beacons and other online tracking technologies in greater detail.
4. General. This section outlines general concepts that apply to all the types of PI we collect. It also explains the data protection or consumer rights you may have, how we communicate changes to this Privacy Policy, and how you can contact

us regarding any questions, issues and/or to exercise your rights with respect to your personal information or anything contained within this Privacy Notice.

## 1. The personal information Entelo collects and why we collect it

The personal information that we may collect about you broadly falls into the following categories:

Our legal basis under the GDPR for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it. However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms.

In general, we will use the personal information we collect from you only for the purposes described in this Privacy Notice or for purposes that we explain to you at the time we collect your personal information. However, we may also use your personal information for other purposes that are not incompatible with the purposes we have disclosed to you (such as archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes) if and where this is permitted by applicable data protection laws.

If you have questions or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the [“How to contact us”](#) below.

What personal information we collect	Why we collect this personal information
<p><b>Information that you provide voluntarily:</b></p> <p>Certain parts of our Website and our Services, and if you attend one of our marketing events or webinars, or if you enquire about our Services or ask for a product demonstration, we may ask you to provide personal information voluntarily. This includes: name, job title, employer, and contact details (address, email and phone)</p>	<p>We collect this personal information for the following commercial purposes</p> <ul style="list-style-type: none"><li>• <b>Account registration:</b> We collect information that is necessary for you to register an account with, and log in to, our Website and Services;</li><li>• <b>Customer communications:</b> We collect information that is necessary to respond to</li></ul>

<p>number). You may also need to create an account ID and password to access our Services.</p>	<p>product enquiries and support requests you submit through the Website and Services.</p> <ul style="list-style-type: none"> <li>• <b>Direct marketing:</b> We collect information to send you direct marketing about our Services, marketing offers and resources, newsletters and other company updates to Customers, Users and marketing leads. The foregoing does not apply to our candidates that engage with our platform for interviewing or scheduling with our clients.</li> <li>• <b>To personalize the marketing e-mails that we send you:</b> we infer your interests from your blog comments and Website interactions so that we can send you emails that are more relevant to you; the foregoing does not apply to our candidates that engage with our platform for interviewing or scheduling with our clients.</li> <li>• <b>When you request a demo or request to be contacted.</b> We use your personal information to contact you and provide information about our Services.</li> <li>• <b>When you Comment on our Blog.</b> Your comment may include personal information that is posted on our Blog.</li> </ul> <p>Where we need your consent to collect and use your personal information under applicable data protection laws, we will ask for this at the relevant time and make clear the purposes to which you are consenting.</p>
<p><b>Information that we collect automatically:</b></p> <p>When you visit our Website or use our Services, we may collect certain information automatically from your device.</p> <p>The information we collect automatically may include identifiers (such as IP address, device type, unique device identification numbers), browser-type, geolocation information (broad geographic location such as country or city-level location) and other technical information. We may also collect internet activity information about how your device has interacted with our Website or Services, including the pages accessed and links clicked as well as how you interact with marketing emails and other communications we may send you.</p>	<p>We collect this personal information for the following business purposes</p> <ul style="list-style-type: none"> <li>• <b>Analytics and fraud prevention:</b> We collect information that for our internal reporting and business analytics, to prevent or detect illegal activities on our Website or Services (or other activities that do not comply with our Terms of Service), and to improve the quality and relevance of our Website to visitors.</li> <li>• <b>Auditing related to current interactions with you and concurrent interactions with our website:</b> to verify accurate delivery of our Services.</li> <li>• <b>Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for those activities:</b> for example,</li> </ul>

<p>Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading "<a href="#">Cookies and Similar Tracking Technology</a>".</p>	<p>to identify invalid clicks and protect us from fraudulent behaviour; and</p> <ul style="list-style-type: none"> <li>• <b>Verifying or maintaining the quality of our Services and improving, upgrading or enhancing them:</b> for example, (i) for audit, research, and analysis of the information in order to maintain, improve, upgrade or enhance our services, and to ensure that our technologies function properly, (ii) other internal operations, such as debugging, support, and security.</li> </ul> <p>Where we need your consent to collect and use your personal information under applicable data protection laws, we will ask for this at the relevant time and make clear the purposes to which you are consenting.</p>
<p><b>Information that we obtain from third party sources:</b></p> <p>We may obtain marketing leads from third parties, including name, email address and other contact information.</p> <p>We may receive personal information about Job Candidates from third party sources. The categories of personal information we obtain include: name, education, location, skills, company name, job title, industry, achievements, applicant tracking, information provided in interviewing.</p> <p>If you are not located in the EEA, we may obtain sensitive personal data such as race or ethnicity, or gender via self-identification or publicly available information.</p> <p>The categories of third party sources from whom we obtain this data are: basic contact info, such as, name, email, company, title, phone, address</p> <p>We only collect this personal information where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.</p>	<p>We collect this personal information for the commercial purpose of providing Services to our Customers.</p> <p>We also collect this personal information for the business purposes of:</p> <ul style="list-style-type: none"> <li>• <b>Supplementing our records:</b> We collect information that is necessary supplement the records we hold about you, so that we can improve the quality and relevance of any advertising or communications we send you.</li> <li>• <b>For compliance with legal obligations:</b> to comply with legal obligations that apply to us; and</li> <li>• <b>For any other purpose to which you consent:</b> to use your personal information for any other purpose to which you have provided consent.</li> </ul>

## 2. Who does Entelo share personal information with?

We may disclose personal information to third parties for a variety of business or commercial purposes. This includes disclosure:

- to our **group companies** *for our operational business purposes*. We currently have a subsidiary in Belgrade, Serbia.
- to our **third-party services providers** who provide data processing for our operational business purposes. For example, we may disclose this personal information to support the delivery of, provide functionality on, or help to enhance the security of our Website or Services), or for other operational and commercial purposes that are described in this Privacy Notice or notified to you when we collect your personal information;
- to our **partners** with whom we share data for the Entelo platform. We may disclose this information for our operational business purposes or for the commercial purpose to provide Services to our Customers.
- to our **customers**, for the commercial purpose of providing our services;
- to any **competent law enforcement body, regulatory, government agency, court or other third party** where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- to an actual or **potential buyer** (and its agents and advisers) in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice;
- to any **other person with your consent** to the disclosure.

- as otherwise allowed by applicable data protection law.

### 3. Cookies and Similar Tracking Technologies

When you visit the Entelo Website or use the Services, or both, we and our third-party service providers acting on our behalf automatically collect certain data using tracking technologies like cookies, web beacons, and similar technologies.

A cookie is a small amount of data, which often includes an anonymous unique identifier that is sent to your browser from a website's computers and stored on your computer's hard drive.

These technologies are used to help us better understand user behavior and facilitate and measure the effectiveness of our Entelo Website and Services.

We use cookies to record current session information. We also use third party cookies (for example Google Analytics) to provide aggregated information on Website usage statistics and patterns.

All modern Internet browsers allow you to control your cookie settings. These settings are usually accessed in the 'Options' or 'Preferences' section of your browser. On your mobile device, go to Settings, then go to the specific web-browser, and then to the Cookies section. Please note that certain features of the Website will not be available once cookies are disabled. For further information about cookies and how to manage them, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

Entelo uses web beacons with cookies or separately to compile information about your engagement with us. Web beacons are clear electronic images that can recognize certain types of information on your computer, such as cookies, when you view a particular website tied to the web beacon, and a description of a website tied to the web beacon.

Here is a basic description and overview of the type of cookies Entelo uses:

<b>Cookie Type</b>	<b>Description</b>	<b>Management Setting</b>
<i>Required Cookies</i>	Required cookies make it possible for you to access the Services, navigate within the Services, and access information related to your account.	Required cookies are necessary to operate the account portal, so you can't opt out of them.

---

Each time you log into the Services, a cookie containing an encrypted, unique identifier that is tied to your account is placed on your browser. These cookies allow Entelo to uniquely identify you when you are logged into the Services and to process your requests.

---

*Functionality Cookies*

Functionality cookies allow the Entelo Website and Services to remember information you have entered or preferences you select, and provide enhanced, more personal features. These cookies allow you to optimize your use of the Services after logging in. These cookies can also be used to remember changes you have made to the portions of your account that you can customize.

You can use your browser settings to opt out of functionality cookies. For more information on how to do that, click [here](#). Note that opting out may affect the functionality of our Website or Services for you.

---

*Performance Cookies*

These cookies collect data about how visitors use the Entelo Website or Services. This includes data like which pages visitors go to the most. These cookies don't collect information that individually identifies visitors. The data these cookies collect is aggregated and intended to be de-identified and used to improve how the site functions and performs.

*Third party service providers that currently place performance cookies within the Services or Entelo Website include:*

---

Google Analytics: We use Google Analytics to help analyze page statistics and user behavior to the Entelo Website and Services.

For information on how to opt-out of tracking technologies from Google Analytics, click [here](#).

---

	<p>Optimizely: We use Optimizely to optimize page content on the Entelo Website and Services.</p>	<p>For information on how to opt-out of tracking technologies from Optimizely, click <a href="#">here</a>.</p>
	<p>New Relic Systems: We use New Relic to help analyze Website page performance</p>	<p>For information on New Relic's cookie policy, click <a href="#">here</a>.</p>
	<p>AppCues: We use AppCues to help analyze user behavior within the Services.</p>	<p>For information on Appcues' Privacy Notice, click <a href="#">here</a>.</p>
	<p>Mixpanel: We use Mixpanel to help analyze user behavior within the Services.</p>	<p>For information on Mixpanel's Privacy Notice, click <a href="#">here</a>.</p>
<p><i>Advertising Cookies</i></p>	<p>Entelo may have third party service providers track and analyze usage and volume statistical information from those who visit the Entelo Website and Services. Entelo sometimes uses cookies placed by its third-party service providers to track the performance of our advertisements. For example, these cookies remember which browsers have visited the Entelo Websites or the Services. This data given to the third-party service providers does not include information that identifies you specifically, but this data may be re-associated with information that identifies you specifically after Entelo receives it.</p>	<p>To learn more about how to opt out of targeting and advertising cookies, you can go to the <a href="#">Your Online Choices page</a>, the <a href="#">Network Advertising Initiative page</a>, and the <a href="#">Digital Advertising Alliance's Consumer Choice page</a>. These opt-out tools are provided by third parties, not Entelo. We do not control or operate these tools or the choices that advertisers and others provide through these tools.</p>

#### **4. General**

##### **A. How we secure your PI**

Entelo takes security very seriously.

We use appropriate security measures to protect the security of your PI both online and offline. These measures vary based on the sensitivity of the information that we collect, process and store. Entelo has completed SOC2 Type 2 compliance. For more information regarding our security measures please visit [here](#). Please note, though, that no website or Internet transmission is completely secure, so while we strive to protect your PI, we cannot guarantee that unauthorized access, hacking, PI loss or a PI breach will never occur.

## **B. Privacy Shield Framework; International Operations and Transfers Out of the EEA**

Entelo's own data centers are located in the United States and by using our Services, interacting with our Website, or otherwise providing your PI to us, your PI will be transferred to and processed in the United States except as stated below in this Section. We also have your data processed from our Belgrade, Serbia office for purpose of providing our services to our customers.

Entelo complies with the EU-U.S. Privacy Shield framework ("Privacy Shield") as set forth by the U.S. Department of Commerce and the European Commission regarding the collection, use, and retention of personal information from data subjects who reside in the EU, and which has been adopted by the EEA. Entelo has certified that it adheres to the Privacy Shield Principles of notice, choice, accountability for onward transfer, security, data integrity and purpose limitation, access, and recourse, enforcement and liability. To learn more about the Privacy Shield program, and to view Entelo's certification, please visit the Privacy Shield website at <https://www.privacyshield.gov/>. With respect to PI received or transferred pursuant to the Privacy Shield Framework, Entelo is subject to the investigatory and enforcement powers of the United States Federal Trade Commission.

In some cases, Entelo may share your PI with its subprocessors, to the extent permitted by applicable law. Each of these subprocessors are limited to accessing or using this PI to provide our hosted services only and must provide reasonable assurances that they will appropriately safeguard any customer data provided by Entelo. Each of these subprocessors using customer data complies with the Privacy Shield and processes this data in the United States only, with the exception of SendGrid. SendGrid provides email optimization services for some customers of Entelo. SendGrid processes PI in regions it determines, currently the United States, England, Japan and India. [Click here for list of our current subprocessors.](#)

We have implemented safeguards to ensure an adequate level of data protection where your PI is transferred to countries outside the EEA, such as standard contractual clauses for the transfer of PI as approved by the European Commission (Art. 46 GDPR).

In cases of onward transfer to third parties of data of EEA individuals received pursuant to the Privacy Shield, Entelo is potentially liable.

### **C. Information about Children**

We do not knowingly collect any personal information directly from children under the age of 16. If we discover we have received any personal information from a child under the age of 16, we will take reasonable steps to delete that information as quickly as possible. If you believe we have any information from or about anyone under the age of 16, please contact us at [privacy@entelo.com](mailto:privacy@entelo.com).

### **D. Data Protection Rights**

Entelo supports the exercise of your data protection rights in accordance with applicable data protection laws. Specifically, if you are located in the EEA or are a California resident (or otherwise have these rights under applicable data protection law):

- You can request to **know, access, correct, update or delete** your personal information by contacting us using the contact details provided under the “[How to contact us](#)” heading below, and we will fulfill your request in accordance with applicable data protection laws. We may need to verify your identity in order to action your request, including by asking for you to provide a government issued Identification Document. Once we have verified you, we will respond and comply with your specific requests.
- You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under “[How to contact us](#)”.

California residents have the following rights:

- This Privacy Notice describes the categories of personal information that we have collected, disclosed for a business purpose and sold over the preceding twelve (12) months. Please refer to the sections headed “[What information does](#)

[Entelo collect?](#)” and “[Who does Entelo share my personal information with?](#)” for more information.

- You are entitled to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. If you are a California resident and would like to request this information then please submit a request to Entelo as described below at “[How to contact us](#)”.
- You have the right to opt out of the sale of your personal information, described in the Section “[Who Does Entelo Share My Personal Information With?](#)” If you wish to opt out from the sale of your personal information, you can do so by contacting us using the “[how to contact us](#)” information below.
- You have the right not to receive discriminatory treatment for the exercise of your privacy rights under California law.

If you are located in the EEA, you may also have the following rights:

- You can **object to the processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the “[How to contact us](#)” heading below.
- If we have collected and process your personal information on the basis of your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If you would like to exercise any of your rights or have questions about our privacy practices, you can contact us using the details provided under the [“How to contact us”](#). We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

## **6. Data Retention and Deletion**

Entelo will retain your information as long as we have a legitimate interest or business purpose to retain the information, or as otherwise allowed by applicable law.

If you are a job candidate whose personal information has been provided to Entelo by an Employer using ConveyIQ by Entelo, then we will keep a copy of your personal information until a period not to exceed 90 days after the end of our contract with the applicable Employer, or another length of time as required by the applicable Employer.

## **7. Changes to this Notice**

We are constantly trying to improve our Website and the Services, so this Privacy Notice may need to change. If we change the Privacy Notice then we will notify you here in this Privacy Notice by describing the changes at the top of this Privacy Notice.

## **8. How to contact us.**

Any questions about this Privacy Notice, our privacy practices or to submit a request to exercise data subject rights, should be addressed

by email to: [privacy@entelo.com](mailto:privacy@entelo.com)

by mail to: Entelo, Attn: Legal, 755 Sansome Street, Suite 100, San Francisco, CA 94111, USA or

via our website [here](#).

by phone: (888) 402-3010

We prefer email.

If you are located in the EEA and contacting us does not resolve your complaint, you may file a complaint, free of charge, with the relevant EU data protection authority (DPA). Entelo will cooperate with the United States Federal Trade Commission and any DPAs in the investigation and resolution of complaints that cannot be resolved between Entelo and the complainant that are brought to a relevant DPA. Further, you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

If you are unable to access this notice, please contact us and we will arrange to supply you with the information you need in an alternative format that you can access. You can access a printable version of this notice [here](#).