

# Privacy Policy

## 1. Important information and who we are

### **Purpose of this privacy policy**

Welcome to Creator Economy Jobs's privacy policy. We respect your privacy and are committed to protecting your personal data. This privacy policy explains how we process your personal data when you visit our website or app or use our services and tells you about your privacy rights and how the law protects you.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

If you are a California resident, please see our California Resident Privacy Notice for supplemental information and disclosures regarding your rights.

### **Controller**

Quartermast, LLC dba Creator Economy Jobs is the data controller and is responsible for your personal data (collectively referred to as "Creator Economy Jobs", "we", "us" or "our" in this privacy policy).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager via email at [info@creatoreconomyjobs.co](mailto:info@creatoreconomyjobs.co).

### **Changes to the privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review and may update this policy from time to time without notice. If we materially change the ways in which we use or share personal data previously collected from you through the website and services, we will notify you through the website and services, by email, or other communication.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy

statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## 2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, email address, address, date of birth, telephone number.
- **Contact Data** includes address, email address and telephone number.
- **Engagement Data** includes details about how you use our platform, jobs that you have seen, applied for and/or are interviewing for, feedback about your progress in relation to job applications, and messages that you send to and/or receive from recruiters on our platform.
- **Profile Data** includes your username and password, your interests, preferences and feedback, languages that you speak, your education and work history (including details of roles, projects and your salary (if you choose to provide it)), and your job search preferences.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website or the app.
- **Usage Data** includes information about how you use our website, app, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Special Categories of Data** includes details about your ethnicity, sexual orientation and gender identity. By providing this data, you consent to it being processed as further described in this privacy policy.

We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

### If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the

contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

### 3. How your personal data is collected

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Profile, Engagement, Marketing and Communications and Special Categories of Data by entering data on our website or by corresponding with us by mail, phone, email or otherwise.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data and Usage Data. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources, including information sent to us by employers that use our platform and publicly available sources such as LinkedIn.

### 4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.
- Where we have your consent, when processing Special Categories of Data or when the law requires us to seek your consent before sending marketing emails to you. You have the right to withdraw consent to marketing at any time by contacting us.

### Purposes for which we will use your personal data

We have set out below a description of the ways we may use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose / Activity	Type of data	Lawful basis for processing including basis
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		<b>of legitimate interest</b>
To register you as a new customer and allow you to access our website, and services, including our job matching service.	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Engagement</li> <li>• Profile</li> <li>• Usage</li> <li>• Marketing and Communications</li> <li>• Special Categories</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Consent (Special Categories only)</li> </ul>
To manage our relationship with you which may include contacting you with updates or information about our service (but excluding marketing).	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Profile</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary to comply with a legal obligation</li> <li>• Necessary for our legitimate interests (to keep our records updated and provide relevant information to our customers)</li> </ul>
To operate, administer and protect our business, this website (including dealing with our customers, troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Technical</li> <li>• Engagement</li> <li>• Profile</li> <li>• Usage</li> <li>• Special Categories</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud, to enforce our Terms and Conditions or other legal rights, and in the context of a business reorganization or group restructuring exercise)</li> <li>• Necessary to comply with a legal obligation</li> <li>• Consent (Special Categories only)</li> </ul>
To deliver relevant website and app content and	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> </ul>	Necessary for our legitimate interests (to study how

advertisements to you, and measure or understand the effectiveness of the information we serve to you.	<ul style="list-style-type: none"> <li>● Engagement</li> <li>● Profile</li> <li>● Usage</li> <li>● Marketing and Communications</li> <li>● Technical</li> </ul>	customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.	<ul style="list-style-type: none"> <li>● Technical</li> <li>● Usage</li> </ul>	<ul style="list-style-type: none"> <li>● Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</li> </ul>
To make suggestions and recommendations to you about roles and companies that may be of interest to you, and to allow companies to reach out to you about roles that may be of interest.	<ul style="list-style-type: none"> <li>● Identity</li> <li>● Contact</li> <li>● Engagement</li> <li>● Profile</li> <li>● Usage</li> <li>● Marketing and Communications</li> <li>● Technical</li> <li>● Special Categories</li> </ul>	<ul style="list-style-type: none"> <li>● Necessary for our legitimate interests (to develop our products / services and grow our business)</li> <li>● Consent (Special Categories only)</li> </ul>

**Tailored Content and Marketing**

We may use your Identity, Engagement, Profile, Technical, Usage and Special Categories of Data to form a view on jobs or services that you may be interested in, or that may be suitable for you and may display relevant content on our website, or send it to you by email. You may also receive marketing communications from us if you have opted in to receive marketing, or if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing.

**Opting out**

You can ask us to stop sending you marketing or job notification messages at any time by following the opt-out links on any marketing message sent to you.

**Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this

website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy .

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **5. Disclosures of your personal data**

When processing your personal data as described above, we may share your personal data with the parties set out below:

- Third party employers that use our website and services to select and recruit candidates. Those third parties will process any personal data that we provide to them as data controllers.
- Service providers acting as processors who provide IT, software and/or system administration services.
- Professional advisers acting as processors including our lawyers, bankers, auditors and insurers who provide us with consultancy, banking, legal, insurance and accounting services.
- When required by law or regulation, regulators and other authorities acting as processors or joint controllers.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **6. International transfers**

Some of the suppliers that we use to operate our services, and some of the employers that use our website are based outside the United States so their processing of your personal data will involve a transfer of data outside the United States. Whenever we transfer your personal data out of the United States, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the United States which give personal data the same protection it has in the United States.
- Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the United States.

## **7. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have internal procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8. Data retention**

### **How long we will use your personal data**

We will only retain your personal data for as long as reasonably necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## **9. Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.

- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us or our representative using the contact details set out above.

**No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

**What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

**Last Updated:** October 1, 2023