

# **Privacy Policy**

## Introduction

SkillPUSH is a web based industry agnostic networking, job board, career management, applicant tracking and payroll services for job seeking or hiring professionals. Members use SkillPUSH services to search, find and be found for career opportunities and to network with other users and share information. The SkillPUSH Privacy Policy applies to any Member or Visitor to the covered Services.

Registered users of SkillPUSH ("**Members**") share professional identities, personal and employment history, build relationships through the SkillPUSH network, exchange ideas and knowledge, learn and find business and career opportunities. Some SkillPUSH content and services are available to non-members ("**Visitors**").

## **Data Controllers**

If you reside in the United States, you are entering into the <u>User Agreement</u> with SkillPUSH Corporation, who will be responsible for your personal data provided to, or collected by or for, our Services. If you reside outside the United States, you are entering into the User Agreement with SkillPUSH Ireland U.C., who will be the controller of your personal data provided to, or collected by or for, our Services.

## Services

This Privacy Policy applies to SkillPUSH.com, SkillPUSH-branded apps, Slideshare, SkillPUSH Learning and other SkillPUSH-related sites, apps, communications and services ("Services"), including off-site Services, such as our ad services and the "Apply with SkillPUSH" and "Share with SkillPUSH" plugins, but excluding services that state that they are offered under a different privacy policy.

If you use our Services, you consent to this Privacy Policy, including our Cookies Policy.

## Consent

If you use our Services, you consent to the collection, use and sharing of your personal data under this Privacy Policy (which includes our <u>Cookie Policy</u>The Cookie Policy describes the use of cookies and similar technologies. and other documents referenced in this Privacy Policy) and agree to the <u>User Agreement</u>. We provide you <u>choices</u> that allow you to opt-out or control how we use and share your data.

If you use our Services after an update to this Privacy Policy, you consent to the changed policy.

## Change

We may modify this Privacy Policy, and if we make material changes to it, we will provide notice through our Services, or by other means, to provide you the opportunity to review the changes before they become effective. If you object to any changes, you may <u>close your account</u>. Your continued use of our Services after we publish or send a notice about our changes to this Privacy Policy means that you are consenting to the updated Privacy Policy.

# 1. Information We Collect

1.1 Information You Provide To Us

You provide data to create an account with us.

# Registration

To create an account you provide data including your name, email address and/or mobile number, and a password. If you register for a premium Service, we ask you for payment (e.g., credit card) and billing information.



You create your SkillPUSH profile (a complete profile helps you get the most from our Services).

#### **Profile**

You have <u>choices</u> about the information on your profile, such as your education, work experience, skills, photo, <u>city or area</u> and endorsements. Some professionals may choose to complete a separate <u>ProFinder profile</u>. Profile information helps you to get more from our Services, including helping recruiters and business opportunities find you. It's your choice whether to include <u>sensitive information</u>We do *not* require members to include sensitive data (e.g., race, ethnicity, political opinions, religious or philosophical beliefs, membership of a trade union, physical or mental health, sexual life or criminal record) in their SkillPUSH profile. If you choose to post any such data, it is visible to others like the rest of the profile information you provide. on your profile. **Please do not post or add personal data to your profile that you would not want to be publicly available.** 

You give other data to us, such as by syncing your address book or calendar.

# Posting and Uploading

We collect personal data from you when you provide, post or upload it to our Services, such as when you fill out a form, respond to a survey (e.g., Members' <u>salary</u>), submit a resume and apply for or save jobs or send invitations. If you opt to import your address book, we receive your contacts (including contact information your service provider(s) or app automatically added to your address book when you communicated with addresses or numbers not already in your list). If you sync your email or calendars with our Services, we will collect your "email header" and calendar meeting information (e.g. times, places, attendees and contacts).

1.2 Information From Others

Others may post or write about you.

## Content and News

You and others may post content that includes information about you on our Services (as part of blog posts, feed updates and comments, videos). Unless you <u>opt-out</u>, we collect public information about you, such as professional-related news and accomplishments (e.g., patents granted, professional recognition, conference speakers, projects, etc.) and make it available as part of our Services (e.g. suggestions for your profile, or notifications of <u>mentions in the news</u>). Others may sync their contacts or calendar with our Services.

### **Contact and Calendar Information**

We receive personal data about you when others import or sync their address book or calendar with our Services, or send messages using our Services (including invites or connection requests).

Customers and partners may provide data to us.

# **Partners**

We receive personal data about you when you use the services of our customers and partners, such as prospective employers and applicant tracking systems providing us job application data.

1.3 Service Use

We log your visits and use of our Services, including mobile apps.

We log usage data when you visit or otherwise use our Services, including our sites, app and platform technology (e.g., our off-site plugins), such as when you view or click on content (e.g.,



learning video) or ads (on or off our sites and apps), perform a search, install one of our mobile apps, share articles or apply for jobs. We use log-ins, cookies, <u>device information</u> and internet protocol ("IP") addresses to identify you and log your use.

1.4 Cookies, Web Beacons and Other Similar Technologies

We collect data through cookies and similar technologies.

As further described in our <u>Cookie Policy</u>, we use cookies and similar technologies (e.g., web beacons, pixels, ad tags and device identifiers) to recognize you and/or your device(s) on, off and across different Services and devices. We also allow some others to use cookies as described in our Cookie Policy. You can control cookies through your browser settings and other tools. You can also <u>opt out</u> from our use of cookies and similar technologies that track your behavior on the sites of others for third party advertising. For Visitors, the opt out is <u>here</u>.

1.5 Your Device and Location

We receive data from your devices and networks, including location data.

When you visit or leave our Services (including our plugins or cookies or similar technology on the sites of others), we receive the URL of both the site you came from and the one you go to next. We also get information about your IP address, proxy server, operating system, web browser and add-ons, device identifier and features, and/or ISP or your mobile carrier. If you use our Services from a mobile device, that device will send us data about your location. Most devices allow you to prevent location data from being sent to us and we honor your settings.

1.6 Messages

If you communicate through our Services, we learn about that.

We collect information about you when you send, receive, or engage with messages in connection with our Services. For example, if you get a SkillPUSH connection request, we track whether you have acted on it and will send you reminders. We also use <u>automatic scanning</u> technology on messages.

1.7 Workplace Provided Information

When your employer buys a premium Service for you to use at work, they may give us data about you.

An employer (or other person or entity procuring our Services for your use) may provide us information about their employees or contractors who make use of these Services. For example, we will get contact information for "Company Page" administrators and for authorizing users of our premium Services, such as our recruiting, sales or learning products.

1.8 Sites and Services of Others

We get data when you visit sites that include our plugins, ads or cookies or log-in to others' services with your SkillPUSH account.

We receive information about your visits and interaction with services provided by others when you log-in with SkillPUSH or visit others' services that include our plugins (such as "Share on SkillPUSH") or "Apply with SkillPUSH"), ads, cookies or similar technologies.

1.9 Other

We are improving our Services, which means we get new data and create new ways to use data.

Our Services are dynamic and we often introduce new features, which may require the collection of new information. If we collect materially different personal data or materially change how we use your data, we will notify you and may also modify this Privacy Policy.



### 2. How We Use Your Data

We use your data to provide, support, personalize and develop our Services.

How we use your personal data will depend on which Services you use, how you use those Services and the choices you make in your <u>settings</u>. We use the data that we have about you to provide, support, personalize and make our Services (including ads) more relevant and useful to you and others.

2.1 Services

Our Services help you connect with others, find and be found for work and business opportunities, stay informed, get training and be more productive.

We use your data to authenticate you and authorize access to our Services.

# **Stay Connected**

Our Services allow you to stay in touch, in communication and up to date with colleagues, partners, clients, and other professional contacts. To do so, you will "connect" with the professionals who you choose, and who also wish to "connect" with you. When you connect, you will be able to search each others' connections in order to exchange professional opportunities.

We will use data about you (such as profiles you have viewed or data provided through address book uploads or partner integrations) to suggest connections for you and others (e.g. Members who share your contacts) and enable you to invite others to become a Member and connect with you. You can also opt to allow us to use your precise location or proximity to others to suggest other nearby Members for you to connect with. It is your choice whether to invite someone to our Services, send a connection request, or allow another Member to become your connection. When you invite someone to connect with you, your invitation will include your name, photo, network and contact information. We will send invitation reminders to the person you invited. You can choose whether or not to share your own list of connections with your connections. Visitors have choices about how we use their data.

### Stav Informed

Our Services allow you to stay informed about news, events and ideas regarding professional topics you care about, and from professionals you respect. Our Services also allow you to improve your professional skills, or learn new ones. We use the information about you to recommend relevant content across our Services, suggest skills you may have to add to your profile and skills that you might need to pursue your next opportunity. So, if you let us know that you are interested in a new skill (e.g., by watching a learning video), we will use this information to personalize content in your feed, suggest that you follow certain members on our site, or watch related learning content to help you towards that new skill. We use your content, activity and other data, including your name and picture, to provide notices to your network and others. For example, subject to your settings, we may notify others that you have updated your profile, posted a blog, took a *social actione*.g. like, comment, follow, share, made new connections or were mentioned in the news.

## Career

Our Services allow you to explore careers, evaluate educational opportunities, and seek out, and be found for, career opportunities. Your profile can be found by those looking to hire (for a job or a specific task) or be hired by you. We will use your data to recommend jobs, show you and others who work at a company, in an industry, function or location or have certain skills and connections. You can signal that you are interested in changing jobs and share information with



job recruiters. We may use your profile and activity to recommend jobs to you and you to recruiters.

# **Productivity**

Our Services allow you to collaborate with colleagues, search for potential clients, customers, partners and others to do business with. Our Services allow you to communicate with other professionals and schedule and prepare meetings with them. Subject to your settings, we scan messages to provide "bots" or similar tools that facilitate tasks such as scheduling meetings, draft responses, summarize messages or recommend next steps.

2.2 Premium Services

Our premium Services allow paying users to search for and contact Members through our Services, such as searching for and contacting job candidates, sales leads and co-workers, manage talent and promote content through social media.

We sell premium Services that provide our customers customized-search functionality and tools (including messaging and activity alerts) as part of our talent, marketing and sales solutions. These subscribers can export limited information from your profile, such as name, headline, current company, current title, and general location (e.g., Dublin), in order to manage sales leads or talent, unless you opt out. We do not provide contact information to these subscribers as part of these premium Services without your consent. A premium Services subscriber can store information he/she has about you in our premium Services, such as a resume or contact information or sales history. The data provided about you by these subscribers is subject to the policies of those subscribers. Other enterprise Services that use your data include SkillPUSH Referrals (job referrals), Lookup (enterprise directory) and Elevate (social promotion of content). Learn more.

2.3 Communications

We contact you and enable communications between members. We offer settings to control what and how often you receive some types of messages.

We will contact you through email, notices posted on our websites or apps, messages to your SkillPUSH inbox, and other ways through our Services, including text messages and push notifications. We will send you messages about the availability of our Services, security, or other service-related issues. We also send messages about how to use the Services, network updates, reminders, job suggestions and promotional messages from us and our partners. You may change your communication <u>preferences</u> at any time. Please be aware that you cannot opt out of receiving service messages from us, including security and legal notices.

We also enable <u>communications</u> between you and others through our Services, including for example <u>invitations</u>, <u>InMail</u>, <u>groups</u> and <u>messages</u> between connections.

2.4 Advertising

We serve you tailored ads both on and off of our Services. We offer you choices to opt out of interest based ads, but you cannot opt out of seeing generic ads.

We target (and measure the performance of) ads to Members, Visitors and others both on and off of our Services through a variety of ad networks and exchanges, using the following data, whether separately or combined:

- Data from advertising technologies on and off of our Services, like web beacons, pixels, ad tags, cookies, and device identifiers;
- Member-provided information (e.g., contact information, title and industry);

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- Data from your use of our Services (e.g., search history, feed, content you read, who you follow or is following you, connections, groups participation, page visits, videos you watch, clicking on an ad, etc.), including as described in Section 1.3;
- Information from others (e.g. advertising partners, publishers and data aggregators);
- Information inferred from data described above (e.g., using job titles to infer age, industry, seniority, and compensation bracket; or names to infer gender).

We will show you ads called <u>sponsored content</u> which look like similar non-sponsored content, except that they are labeled ads or sponsored. If you take an action (such as like, comment or share) on these ads, your action is associated with your name and viewable by others, including the ad provider.

## **Ad Choices**

We adhere to <u>self-regulatory principles</u> for interest-based advertising and participate in industry <u>opt outs</u> from such ads. This does not opt you out of receiving advertising - you will continue to get generic ads or ads by advertisers not listed with these self regulatory tools. You can also <u>opt out</u> specifically from interest-based advertising served through our platform for third parties. For non-Members, this setting is <u>here</u>.

## Info to Advertisers

We do not share your personal data with any third-party advertisers or (other than hashed or device identifiers, to the extent they are personal data in some countries) ad networks for their advertising without your separate permission. However, if you click on an ad, the ad poster will know you visited the page that you clicked on. Also, advertising partners can associate personal data collected by the advertiser directly from you with our cookies and similar technologies. In such instances, we seek to contractually require such advertisers to obtain your explicit, opt-in consent before doing so.

2.5 Marketing

We promote our Services to you and others.

We use data and content about Members for invitations and communications promoting membership and network growth, engagement and our Services.

2.6 Developing Services and Research

We develop our Services and conduct research.

# Service Development

We use data, including public feedback, to conduct <u>research</u> and development for the further development of our Services in order to provide you and others with a better, more intuitive and personalized experience, drive membership growth and engagement on our Services, and help connect professionals to each other and to economic opportunity.

# Other Research

We seek to create economic opportunity for members of the global workforce and to help them be more productive and successful. We use the data available to us to research social, economic and workplace trends such as jobs availability and skills needed for these <u>jobs</u> and policies that help bridge the gap in various industries and geographic areas. In some cases, we work with



trusted third parties to perform this research, under <u>controls</u> that are designed to protect your privacy. We publish or allow others to publish economic insights, presented as aggregated data rather than personal data.

# Surveys

Polls and surveys are conducted by us and others through our Services. You are not obligated to respond to polls or surveys and you have choices about the information you provide. You may opt out of survey invitations.

2.7 Customer Support

We use data to help you and fix problems.

We use the data (which can include your communications) needed to investigate, respond to and resolve complaints and Service issues (e.g., bugs).

2.8 Aggregate Insights

We use data to generate aggregate insights.

We use your information to produce aggregate insights that do not identify you. For example we may use your data to generate statistics about our users, their profession or industry, the number of ad impressions served or clicked on, or the demographic distribution of visitors to a site.

2.9 Security and Investigations

We use data for security, fraud prevention and investigations.

We use your data (including your communications) if we think it's necessary for security purposes or to investigate possible fraud or other violations of our User Agreement or this Privacy Policy and/or attempts to harm our Members or Visitors.

# 3. How We Share Information

3.1 Our Services

Any information you include on your profile and any content you post or social action (e.g. likes, follows, comments, shares) you take on our Services will be seen by others.

### **Profile**

Your profile is fully visible to all Members and customers of our Services. As detailed in our <u>Help Center</u>, your settings, degree of connection with the viewing Member, the subscriptions they may have, their <u>usage of our Services</u>, access channels and search types (e.g., by name or by keyword) impact the availability of your profile and certain fields.

# Posts, Likes, Follows, Comments, Messages

Our Services allow viewing and sharing information including through posts, follows, likes and comments.

- When you share a post (e.g., an update, video or blog), the default (which
  you can <u>change</u>) is to share it publicly. Others who are not your
  connections will be able to find (including through search engines) and see
  your post.
- When you like, comment on or share another's post, others will see it, including the person who initiated the post.
- In a <u>group</u>, posts are visible to others in the group. Your membership in groups is public and part of your profile unless you change the default settings.

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- Any information you share through companies' or other organizations' pages on our Services will be viewable by it and others who visit those pages.
- When you follow a person or organization, you are visible to others and that "page owner" as a follower. We provide aggregate insights about the followers and viewers to the respective page owners.
- We let senders know when you act on their message, subject to your settings where applicable.

Your employer can see how you use Services they provided for your work (e.g. as a recruiter or sales agent) and related information. We will not show them your job searches or personal messages.

## **Enterprise Accounts**

Your employer may offer you access to our enterprise Services such as Recruiter, Sales Navigator, Elevate, Referrals, Lookup or our advertising Campaign Manager. They can also buy access for you to our online learning products. Your employer can review and manage your use of such enterprise Services.

Depending on the enterprise Service, before you use such Service, we will ask for permission to share relevant data from your profile or use of our non-enterprise Services. For example, users of <u>Sales Navigator</u> will be asked to share their "social selling index", a score <u>calculated</u> in part based on their personal account activity. We understand that certain activities such as job hunting and personal messages are sensitive and so we do not share those with your employer unless you choose to share it with them through our Services (for example, by applying for a new position in the same company or mention your job hunting in a message to a co-worker through our Services).

3.2 Communication Archival

Regulated Members may need to store communications outside of our Service.

Some Members (or their employers) need, for legal or professional compliance, to archive their communications and social media activity, and will use services of others to provide these archival services. We enable such archiving outside of our Services. For example, a financial advisor needs to archive communications with her clients through our Services in order to maintain her professional financial advisor license.

3.3 Others' Services

You may link your account with others' services so that they can look up your contacts' profiles or post your shares on such platforms.

Subject to your preference, other services may look-up your profile.

When you opt to link your account with other services, personal data will become available to them. The sharing and use of that personal data will be described in, or linked to, a consent screen when you opt to link the accounts. For example, you may link your Twitter or WeChat account to share content from our Services into these other services, or your email provider may give you the option to upload your SkillPUSH contacts into its own service. You may <a href="revoke">revoke</a> the link with such accounts.



Subject to your <u>settings</u>, excerpts from your <u>profile</u> will appear on the services of others (e.g., search engine results, mail and calendar applications that show a user a "mini" SkillPUSH profile of the person they are meeting or messaging, social media *aggregators*For example, company page administrators may <u>manage</u> their brand's online presence by aggregating users' comments and other social actions across social networks and see their basic profiles in that context., talent and lead managers). "Old" profile information remains on these services until they update their data cache with changes you made to your profile.

3.4 Related Services

We share your data across our different Services and SkillPUSH-affiliated entities.

We will share your personal data with our *affiliates* Affiliates are companies controlling, controlled by or under common control with us, including, for example, SkillPUSH Ireland UC, SkillPUSH Corporation, SkillPUSH Singapore and Microsoft Corporation. to provide and develop our Services. We combine information internally across the different Services covered by this Privacy Policy. For example, SlideShare will recommend better content to you based on your SkillPUSH profile or the articles you read on Pulse, and SkillPUSH could personalize your feed or job recommendations based on your learning video history, because we are able to identify you across different Services using cookies or similar technologies.

3.5 Service Providers

We may use others to help us with our Services.

We use others to help us provide our Services (e.g., maintenance, analysis, audit, payments, fraud detection, marketing and development). They will have access to your information as reasonably necessary to perform these tasks on our behalf and are obligated to not to disclose or use it for other purposes.

3.6 Legal Disclosures

We may need to share your data when we believe it's required by law or to protect your and our rights and security.

It is possible that we will need to disclose information about you when required by law, subpoena, or other legal process or if we have a good faith belief that disclosure is reasonably necessary to (1) investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies; (2) enforce our agreements with you, (3) investigate and defend ourselves against any third-party claims or allegations, (4) protect the security or integrity of our Service (such as by sharing with companies facing similar threats); or (5) exercise or protect the rights and safety of SkillPUSH, our Members, personnel, or others. We attempt to notify Members about legal demands for their personal data when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague or lack proper authority, but we do not promise to challenge every demand. To learn more see our Data Request Guidelines and Transparency Report.

3.7 Change in Control or Sale

We may share your data when our business is sold to others, but it must continue to be used in accordance with this Privacy Policy.

We can also share your personal data as part of a sale, merger or change in control, or in preparation for any of these events. Any other entity which buys us or part of our business will



have the right to continue to use your data, but only in the manner set out in this Privacy Policy unless you agree otherwise.

# 4. Your Choices & Obligations

4.1 Data Retention

We keep most of your personal data for as long as your account is open.

We retain the personal data you provide while your account is in existence or as needed to provide you Services. Even if you only use our Services when looking for a new job every few years, we will retain your information and keep your profile open until you decide to close your account. In some cases we choose to retain certain information (e.g., visits to sites carrying our "share with SkillPUSH" or "apply with SkillPUSH" <u>plugins</u> without clicking on the plugin) in a depersonalized or aggregated form.

4.2 Rights to Access and Control Your Personal Data

You can access or delete your personal data. You have many choices about how your data is collected, used and shared.

We provide many <u>choices</u> about the collection, use and sharing of your data, from deleting or correcting data you include in your <u>profile</u> and controlling the visibility of your <u>posts</u> to advertising <u>opt-outs</u> and <u>communication</u> controls. We offer <u>access</u> to the personal data we have about you (for SlideShare, please <u>contact us</u>).

4.3 Account Closure

We keep some of your data even after you close your account.

If you choose to close your <u>SkillPUSH</u> (or <u>SlideShare</u>) account, your personal data will generally stop being visible to others on our Services within 24 hours. We generally delete closed account information within 30 days of account closure, except as noted below. We retain your personal data even after you have closed your account if reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse, enforce our User Agreement, or fulfill your request to "unsubscribe" from further messages from us. We will retain de-personalized information after your account has been closed.

Information you have shared with others (e.g., through InMail, updates or group posts) will remain visible after you closed your account or deleted the information from your own profile or mailbox, and we do not control data that other Members copied out of our Services. Groups content associated with closed accounts will show an unknown user as the source. Your profile may continue to be displayed in the services of others (e.g., search engine results) until they refresh their cache.

## 5. Other Important Information

5.1. Security

We monitor for and try to prevent security breaches. Please use the security features available through our Services.

We implement security safeguards designed to protect your data, such as HTTPS. We regularly monitor our systems for possible vulnerabilities and attacks. However, we cannot warrant the security of any information that you send us. There is no guarantee that data may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or



managerial safeguards. Please visit our <u>Safety Center</u> for additional information about safely using our Services, including two-factor authentication.

5.2. Cross-Border Data Transfers

We store and use your data outside your country.

We process data both inside and outside of the United States. <u>Learn more</u> about the legal mechanisms we rely on to transfer data across borders.

SkillPUSH participates in the EU-U.S. and Swiss-U.S. Privacy Shield frameworks. To learn more, read our Privacy Shield Statement.

5.3. Direct Marketing and Do Not Track Signals

Our statements regarding direct marketing and "do not track" signals.

We currently do not share personal data with third parties for their direct marketing purposes without your permission. <u>Learn more</u> about this and about our response to "do not track" signals.

**5.4. Contact Information** 

You can contact us or use other options to resolve any complaints.

If you have questions or complaints regarding this Policy, please first <u>contact SkillPUSH</u> online. You can also reach us by <u>physical mail</u>. If contacting us does not resolve your complaint, you have more <u>options</u>.