

## CITIZEN TALENT PRIVACY POLICY

Last Updated: JULY 9, 2019

**CITIZEN TALENT MANAGEMENT, LLC ("Company") respects your privacy, is seriously committed to protecting the privacy of its users ("Users") and has published this Privacy Policy to explain how Company treats information you submit to Company. Please read this Privacy Policy carefully prior to your access to and/or use of [www.citizenalent.com](http://www.citizenalent.com) (the "Site") or your registration for or use of the Services (as defined in Company's Terms and Conditions of Use Agreement (the "Terms of Use", incorporated herein by reference). If you do not agree to abide by this Privacy Policy, please do not access or use the Site or register as a Member of the Site or Services.**

**By submitting information to Company, either by using the Site or registering for or using the Services, you are accepting the practices described in this Privacy Policy and the Terms of Use. This Privacy Policy is governed by the Terms of Use, which includes all disclaimers of warranties and limitation of liabilities. All capitalized terms not defined in this Privacy Policy will have the meaning set forth in the Terms of Use.**

### **1. ACCESS TO AND USE OF THE SITE AND THE SERVICES**

You represent and warrant that you are fully able and competent to enter into the terms, conditions, obligations, affirmations, representations, and warranties set forth in this Agreement. By using the Service you agree that you are eighteen (18) years of age or older. Protecting the privacy of young children is especially important. For that reason, Company does not knowingly collect or maintain personally identifiable information or non-personally-identifiable information on the Site from persons under 18 years of age, and Membership profiles for individuals under 18 years of age must be maintained by a parent or legal guardian who has registered on their behalf and who utilizes the Site and Services on such individual's behalf (a "Registering Adult"). If Company learns that personally identifiable information of persons under 18 years of age has been collected on the Site without a Registering Adult, then Company will take the appropriate steps to delete this information. If your access or use of the Service is prohibited or restricted in any way by the laws, regulations or other governmental requirements of the jurisdiction in which you live, or if, for any reason and at any time, you do not agree with this Privacy Policy, please discontinue using our Service immediately. **If you are under 18 years of age, then please do not use the Site or Service without a Registering Adult.**

### **2. COLLECTION OF PERSONAL INFORMATION**

Due to the nature of the talent-related management services we provide, the collection of certain of "personal information" (i.e. information that could be used to contact you, such as full name, postal address, user name and password, phone number or e-mail address) and "physical information" (i.e. height, weight, hair and eye color) may be necessary for us to provide you with positive and customized experience on the Site or to provide you with certain Services. We ask that you do not enter personal or physical information into your profile other than the information requested in the fields provided.

You acknowledge that Company may collect and process such personal and physical information as well as "usage information" (i.e. information that you submit, or that we collect, that is not personal information but necessary for the proper functioning of our

Service, such as the date regarding the start and end and the extent of your usage of the Service and your personal interests and preferences), in connection with the Service. Such information collected by Company may be stored and processed in the United States or any other country in which Company or its agents maintain facilities.

By using the Service, you consent to any such transfer of information outside of your country where data protection laws may be different. Company makes no representation or warranty with respect to any duty to permanently store any personal information you may provide. By using our Services and providing us with personal information, you waive any claims that may arise under your own or any other local or national laws, rules or regulations or international treaties. We may from time to time, transfer or merge your personal information collected off-line to our online databases or store off-line information in an electronic format. We may also combine personal information we collect online with information available from other sources, including information received from our promotional partners. This Privacy Policy applies to your personal information for as long as your personal information is in our possession, even if you terminate or discontinue your use of the Service.

**3. CHANGE OR UPDATE REGISTRATION DATA**

You may request a change to or update the Registration Data you provide Company by contacting Company via email at [staff@citizentalent.com](mailto:staff@citizentalent.com) (please include in the Subject line the words "Change in Registration Data"). It is your responsibility to maintain and promptly update the Registration Data to keep it true, accurate, current and complete.

**4. USE OF PERSONAL INFORMATION**

Company uses your personal information to identify you and, in some cases, to improve and customize the content you see on the Site. Your personal information may also be aggregated and used by Company for market research, project planning, troubleshooting problems, detecting and protecting against error, fraud or other criminal activity, to enforce the Terms of Use or any applicable Rules, for other internal purposes, and as otherwise described to you at the time of collection.

You agree that Company may use personal information about you to analyze Site usage, improve or customize Company's Services, customize the Site's content, and as otherwise set forth in this Privacy Policy. You also agree that Company may use your personal information to contact you. Unless you specifically opt out, you also agree that Company may use your personal information to contact you and deliver information to you that, in some cases, is targeted to your interests, such as administrative notices, product offerings, and communications relevant to your use of the Site or the Services. By accepting the Terms of Use and this Privacy Policy, you expressly agree to receive this information, unless you specifically opt out in applicable circumstances.

Any personal information or content that you voluntarily disclose online (in messages, within your public profile page, or elsewhere) may become publicly available and may be collected and used by others. Your username and/or your email address may be displayed to other Users when you upload content or send messages through the Site. Any content that you submit to the Site may be redistributed through the Internet and other media channels, and may be viewed by the general public.

## 5. **DISCLOSURE OF PERSONAL INFORMATION**

Except as expressly provided herein, absent your prior consent, Company does not share your personal information with any unrelated third parties. In addition, the following describes some of the ways that your personal information may be disclosed in the normal scope of business to provide you with the Services:

- *Profile.* Company may post certain information as a part of your User Profile, which will be viewable by other Users and visitors to the site, including but not limited to your username and location. Company will not disclose your home address, email address, phone number, or full name in connection with your User Profile.
- *External Service Providers.* There may be separate services offered by third parties that Company refers to as external service providers that may be complementary to your use of the Site or the Services. If you choose to use these separate services, disclose information to the external service providers, and/or grant them permission to collect information about you, then their use of your information is governed by their privacy policy. With your consent, and for your convenience, Company may provide some of your personal information to an external service provider offering such services. To prevent Company's disclosure of your personally identifiable information to an external service provider, you can decline such consent or simply not use their services. Because Company does not control the privacy practices of these third parties, you should evaluate their practices before deciding to use their services.
- *Internal Service Providers.* Company may use third parties that Company refers to as internal service providers to facilitate or outsource one or more aspects of Company's business, products and Services that Company provides to you and, therefore, Company may provide some of your personal information directly to these internal service providers (e.g. customer care). In some instances, the internal service provider may collect information directly from you. In these cases, you will be notified of the involvement of the internal service provider. If you provide additional information to an internal service provider directly, then their use of your personally identifiable information is governed by their applicable privacy policy.

Notwithstanding the foregoing, Company reserves the right, and you authorize Company, to share or disclose your personal information, including, without limitation, any content, records or electronic communications of any kind, when Company determines, in its sole discretion, that the disclosure of your personally identifiable information is necessary to identify, contact, or bring legal action against you if:

- you are or may be violating the Terms of Use, this Privacy Policy or any applicable Rules;
- you are interfering with Company's or a third party's rights or property;
- you are violating any applicable law, rule or regulation;

- necessary or required by any applicable law, rule or regulation; and/or
- requested by governmental authorities in the event of any investigation, act of terrorism or instance of local, regional or national emergency.

In addition, Company cannot ensure that all of your private communications and other personal information will never be disclosed in ways not otherwise described in this Privacy Policy. By way of example, without limiting the foregoing, Company may be forced to disclose personal information to the government or third parties under certain circumstances or third parties may unlawfully intercept or access your transmissions or communications. Therefore, although Company uses industry standard practices to protect your privacy, Company does not promise, and you should not expect, that your personally identifiable information or private communications will always remain private. However, Company shall use reasonable commercial and legal efforts to protect its users' information and to maintain the privacy and anonymity of Members and users.

In the event of a merger, acquisition, sale of substantially all of its assets or change of control of Company, personal information collected by Company about you will be considered a business asset and will be transferred to the applicable new entity.

#### 6. **NEWSLETTERS, ETC.**

Company maintains a strict "no-spam" policy. If you register for the Service, you may receive Company's newsletter, notices and/or special offers via email, unless you have requested otherwise at the time of registration or as set forth below.

You may unsubscribe from Company's electronic newsletters, notices and/or special offers at any time by following the instructions contained at the end of every such email, or if a third-party vendor provides Company's newsletter, in accordance with the instructions provided by such third party. While all efforts are made to insure this information is viewable in all email browsers, there may be cases where certain email browsers do not display the unsubscribe information correctly. If you are having problems unsubscribing please forward the entire newsletter to [staff@citizentalent.com](mailto:staff@citizentalent.com) with the word "UNSUBSCRIBE" in the Subject line and you will be removed within seven (7) business days. Please note that direct replies to any newsletter are processed by computer and are not always viewed by a human.

#### 7. **COOKIES**

"Cookies" are alphanumeric identifiers in the form of text files that are inserted and stored by your web browser on your computer's hard drive. Company and third party advertisers may set and access cookies on your computer to track and store preferential information about you. Company and third party advertisers gather anonymous information about their users through cookie technology on an aggregate level only. Such aggregated information is used within Company's internal organization and is only shared on an aggregated and non-personally identifiable basis.

#### 8. **SECURITY**

Personal information you submit to Company is password protected for your privacy and security. In the unlikely event that an unauthorized third party compromises Company's security measures, Company will not be responsible for any damages directly or

indirectly caused by an unauthorized third party's ability to view, use or disseminate such information.

9. **LINKS TO THIRD PARTIES**

The Site may include links to third party websites. Such links are not an endorsement by Company of those websites and/or the products or services offered on those websites. Third party websites may have different privacy policies, and Company is not responsible for the privacy practices of those third party websites. If you click on a link to a third party website, Company encourages you to check the privacy policy of that website, as it may differ substantially from that of this Privacy Policy. Company makes no representations or warranties nor is Company responsible for the privacy policies of any websites other than the Site. If you decide to access any third party links appearing on the Site, you do so at your own risk.

10. **TRANSMISSIONS, SUBMISSIONS AND POSTINGS**

Company welcomes the submission of comments, information and feedback regarding the Site and the Services. However, Company does not want to receive certain kinds of information from you, including any confidential or proprietary information, without prior written consent of Company. Although Company does not regularly review your transmissions, submissions or postings, Company reserves the right (but not the obligation), at its sole discretion and at any time, to edit, refuse to post or remove your transmissions, submissions or postings. You hereby acknowledge and agree that Company may review transmissions, submissions or postings made by you to determine, in its sole discretion, your compliance with the Terms of Use, this Privacy Policy and any applicable Rules, and that Company shall have the unrestricted right to use such information for any purpose and without compensation to you.

11. **OTHER TERMS**

To review other applicable terms and conditions that apply to this Privacy Policy, including, without limitation, intellectual property rights, disclaimer of warranties, limitation of liability and resolving disputes, please review the Terms of Use.

12. **CHANGES TO THIS PRIVACY POLICY**

Company reserves the right, at its sole discretion, to update, amend and/or change this Privacy Policy without prior notice and at any time. Updates to this Privacy Policy will be posted here. You are encouraged to revisit this Privacy Policy from time to time in order to review any changes that have been made. Your continued use of the Site and any Services following the posting of any such changes shall automatically be deemed your acceptance of all changes.

13. **SPECIAL NOTE TO INTERNATIONAL USERS**The Site is hosted in the United States. If you are a User accessing the Site from the European Union, Asia, or any other region with laws or regulations governing personal data collection, use, and disclosure, that differ from United States laws, please be advised that through your continued use of the Site, which is governed by U.S. law, this Privacy Notice, and our Terms of Use, you are transferring your personal information to the United States and you consent to that transfer.

14. **IN THE EVENT OF MERGER, SALE, OR BANKRUPTCY**

In the event that Company is acquired by or merged with a third party entity, or sells all or substantially all of its assets, we reserve the right, in any of these circumstances, to transfer or assign the information and content we have received and collected from our Users and Members as part of such merger, acquisition, sale, or other change of control. In the unlikely event of our bankruptcy, insolvency, reorganization, receivership, or assignment for the benefit of creditors, or the application of laws or equitable principles affecting creditors' rights generally, we may not be able to control how your personal information is treated, transferred, or used.

15. **QUESTIONS OR CONCERNS**

If you have questions, comments, concerns or feedback regarding this Privacy Policy, please contact us via any of the methods set forth below:

- Via mail:  
Citizen Talent Management LLC  
15 West 28th Street, 8th Fl  
New York City, NY 10001
- Via email: [staff@citizentalent.com](mailto:staff@citizentalent.com)