JoinTheTrades.com Privacy Notice

Last Updated and Effective: [12] [19], [2022]

We at JoinTheTrades.com LLC ("JoinTheTrades.com", "us", "our", or "we") are strongly committed to transparency, and we want you ("you" or "your") to understand how we collect, use, share and protect your personal information, as well as how you can manage the personal information we collect. This Privacy Notice applies to your interactions with us or your use of our website; (www.jointhetrades.com), products, services, or features, either online or offline (collectively, our "Services"). For certain Services, there may be additional notices about our practices and this Privacy Notice supplements any other privacy policies provided or communicated to you. Please read those additional privacy disclosures to understand how they apply to you.

By using our Services, you acknowledge the terms of this Privacy Notice. If you do not understand the terms of this Privacy Notice, please do not use our Services. If you have questions about this Privacy Notice, please contact us before using, or continuing to use, our Services.

We reserve the right to change our Privacy Notice from time to time by posting the changes here. If we choose to amend this Privacy Notice, we will revise the Last Updated date at the top of this Privacy Notice when we post the updated version. We may also provide you with notice by prominently posting on our website, via email or both, if we make any significant changes to this Privacy Notice. We may also highlight those changes at the top of this Privacy Notice and provide a prominent link to it for a reasonable length of time following the change. Your use of our Services after we have informed you in one of these ways that we made changes to our Privacy Notice will mean that you have understood and acknowledged those changes.

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1. TYPES OF INFORMATION WE COLLECT

We collect two basic types of information from you when you provide it to us and when you use or interact with our Services or through our advertising and media across the Internet: personal information and non-personal information.

Personal information includes all information that relates to you or which are opinions about you personally and either identifies or may be used to identify you personally (collectively, "**personal information**"). We may only collect the following, limited types of personal information from you depending upon the device you are using and how you interact with us or use or interact with our Services, such as your:

- o Contact Information. Name, mailing address, email address, phone number, and other contact information.
- **Device Information.** IP address, browser type and version, browser plug-in types and versions, operating system and platform, device type, device identifiers, and information about how you use and interact with our Services.
- Payment Information. Credit and debit card, bank account, and other financial information necessary to send and receive payments.
- Work and Education History Information. Your employment status and history, education history, certifications, and other employment-related information.
- Account Information. If you create an account, we may store and use your name, email address, zip or postal code and other personal information you may provide with your account. You can access and modify the personal information associated with your account. If you believe that someone has created an unauthorized account, you can request its removal.

We strive to uphold data minimization principles and only seek to collect personal information from you for the purposes described in this Privacy Notice. To see all of the categories of personal information we collect, click here.

Non-personal information includes information that does not personally identify you or information that has been anonymized (collectively, "**non-personal information**"). When we combine non-personal information with personal information, we treat the combined information as personal information.

You can always refuse to provide your personal information, but please note that some personal information is necessary to provide our Services.

2. HOW WE COLLECT PERSONAL INFORMATION

We need to collect personal information from you in order to provide you with our Services, as well as to improve your experience. You may provide us with personal information in several ways, including, for example when you:

- Visit our website or use our Services;
- Register for or create an account;
- Correspond with us in any way, including through questionnaires and surveys;
- Sign up to receive our newsletter or promotional information;
- Ask for customer service, support or other assistance; or
- Interact with us in any other way, online or offline, including through our Services.

Cookies

Like many websites and apps, we use "cookies", which are small text files that are stored on your computer or equipment when you visit certain online pages that record your preferences and actions, including how you use the website. We use this information for analytics purposes which allows us to improve your browsing experience. The information we collect through these technologies will also be used to manage your session. Out of these cookies, the cookies that are categorised as "necessary" are stored on your browser as they are essential for the working of basic functionalities of the website. These necessary cookies cannot be disabled.

You can set your browser or device to refuse all cookies or to indicate when a cookie is being sent. If you delete your cookies, if you opt-out from cookies, or if you set your browser or device to decline these technologies, some Services may not function properly. Our Services do not currently change the way they operate upon detection of a <u>Do Not Track</u> or similar signal.

Online Analytics

We also use various types of online analytics including Google Analytics, a web analytics service provided by Google, Inc. ("**Google**"), on our website. Google Analytics uses cookies or other tracking technologies to help us analyze how users interact with and use the website, compile reports on the related activities, and provide other services related to website and app activity and usage. The technologies used by Google may collect information such as your IP address, time of visit, whether you are a return visitor, and any referring website or app. The information generated by Google Analytics will be transmitted to and stored by Google and will be subject to Google's privacy policies. To learn more about Google's partner services and to learn how to **opt-out** of tracking of analytics by Google <u>click here</u>.

Offline Interactions and Other Sources

We also may collect personal information from other sources, such as our partners or third party service providers, or from our offline interactions with you for the purposes listed in the **How We Use Personal Information** section below, including to enable us to verify or update information contained in our records and to better customize the Services for you.

Social Media Integration

Our Services may, from time to time, contain links to and from social media platforms. You may choose to connect to us through a social media platform, such as Facebook, LinkedIn or Twitter, and when you do, we may collect additional information from you, including the information listed in the **Types of Information We Collect** section above. Please be advised that social media platforms may also collect information from you. When you click on a social plug-in, such as Facebook's "Like" button or Twitter's "Tweet" button, that particular social network's plugin will be activated and your browser will directly connect to that provider's servers. We encourage you to review the social media platforms' usage and disclosure policies and practices, including the data security practices, before using them.

Surveys

From time to time, and subject to your consent where required by applicable local law, we may provide you with the opportunity to participate in surveys, some of which might be sponsored or conducted by a third party. Participation in these surveys is completely voluntary. If you choose to participate, we will request certain personal information from you. If there is a third party sponsor involved in the survey, we may provide certain personal information to the third party sponsor. Please make sure to review the sponsor's privacy policy and be aware that any surveys offered by us may be governed by specific rules and terms and conditions that are separate from and in addition to this Privacy Notice. By participating in any such surveys you will become subject to those rules, including but not limited to receiving emails containing survey communications.

3. HOW WE USE PERSONAL INFORMATION

We primarily use personal information to provide, maintain, and improve our Services, but we may also use personal information to do any or all of the following:

- facilitate your interactions and transactions with us, such as requests for support or additional Services;
- respond to your requests, communications, suggestions, comments, inquiries, and requests (including your feedback about our Services);
- administer our relationship with you, including creating and managing your account;
- develop new products, features, and services;
- better understand the preferences of our customers;
- provide personalized Services, including content and ads;
- provide you with, and improve, relevant marketing offers or information from us or relevant third parties;
- facilitate your participation in our surveys and promotions;
- ensure our systems and premises are secure;
- develop and manage relationships with our business partners;
- engage in public or peer-reviewed scientific, historical, or statistical research (we will collect consent where required by applicable law);
- respond to legally binding requests from law enforcement, regulatory authorities, or other third parties;
- defend, protect or enforce our rights or applicable terms of service or to fulfill our legal or contractual obligations;
- manage any dispute and accidents and take legal or other professional advice;
- to prevent fraud or the recurrence of fraud;
- assist in the event of an emergency;
- comply with applicable law; or
- any other purpose with your consent.

We may also combine your personal information collected through various sources, including information collected through our Services, and develop a customer profile that will be used for the purposes above.

Except as otherwise permitted or required by applicable law, we only retain personal information for as long as we need to use the information for the purposes listed above, including, for legal, regulatory, backup, archival, accounting, and/or audit purposes.

We may use personal information to create non-personal information. We may use non-personal information for any legitimate business purpose.

4. HOW WE SHARE PERSONAL INFORMATION

We do not sell personal information.

We only share personal information in limited circumstances, including where directed by you to share information with certain third parties like employers and trade schools. For example, we may share personal information with our third party service providers, suppliers, vendors, professional advisors and business partners, which may include employers, trade schools, IT service providers, financial institutions and payment providers, customer relationship management vendors, other cloud-based solutions providers, lawyers, accountants, auditors and other professional advisors. We contract with such vendors and advisers to ensure that they only process your personal information under our instructions and ensure the security and confidentiality of your personal information. We share personal information with these third parties to help us:

- with the uses described in the How We Use Information section above;
- in the operation, management, improvement, research and analysis of our Services;
- with our marketing and promotional projects, such as sending you information about products and services you may like and other promotions (provided you have not unsubscribed from receiving such marketing and promotional information from us); and
- comply with your directions or any consent you have provided us.

We may share personal information with law enforcement and regulatory authorities or other third parties as required or permitted by law for the purpose of:

- responding to a subpoena, court order, or other legal processes;
- defending, protecting, or enforcing our rights;
- assisting in the event of an emergency; and
- complying with applicable law.

In accordance with applicable law, we may also transfer or assign personal information to third parties as a result of, or in connection with, a sale, merger, consolidation, change in control, transfer of assets, bankruptcy, reorganization, or liquidation. If we are involved in defending a legal claim, we may disclose personal information about you that is relevant to the claim to third parties as a result of, or in connection with, the associated legal proceedings.

To see all of the categories of personal information we share, click here.

We share non-personal information with third parties as reasonably necessary to meet our business needs.

5. HOW WE PROTECT PERSONAL INFORMATION

We are dedicated to ensuring the security of your personal information. We use physical, electronic, and administrative security measures appropriate to the risks and sensitivity of the personal information we collect. We aim to provide secure transmission of your personal information from your devices to our servers. We have processes to store personal information that we have collected in secure operating environments. Our security procedures mean that we may occasionally request proof of identity before we disclose your personal information to you. We try our best to safeguard personal information once we receive it, but please understand that no transmission of data over the Internet or any other public network can be guaranteed to be 100% secure. If you suspect an unauthorized use or security breach of your personal information, please <u>contact us</u> immediately.

6. DATA TRANSFERS

We are a global business. As such, information we collect may be transferred to, stored, and processed in any country or territory where one or more of our business partners or service providers are based or have facilities which may be a different to your home country. While other countries or territories may not have the same standards of data protection as those in your home country, we will continue to protect personal information that we transfer in line with this Privacy Notice requiring that our business partners or service providers adhere to this Privacy Notice and the applicable privacy regulations in your home country.

7. CHILDREN'S PRIVACY

Our Services are not for children or those under the age of 13. We do not knowingly collect personal information from children or other persons who are under 13 years of age. Individuals who are children or those under the age of 13 should not attempt to provide us with any personal information. If you think we have received personal information from children or those under the age of 13, please <u>contact us</u> immediately.

8. YOUR CALIFORNIA PRIVACY RIGHTS

We do not share personal information with third parties for their own direct marketing purposes without your consent. California residents under 18 years old, in certain circumstances, may request and obtain removal of personal information or content that you have posted on our Services. Please be mindful that this would not ensure complete removal of the content posted by you on our Services. To make any request pursuant to California privacy law, please <u>contact us</u>.

9. YOUR CHOICES AND CONTROLS

We offer you certain choices in connection with our Services.

Access to your personal information

You have the right to request access to the personal information that we collect, use, and disclose about you. You also have the right to not receive discriminatory treatment for exercising your access right. To submit a request or designate an authorized agent to make a request, please <u>contact us</u> using the information below.

Deleting your personal information

You have the right to request that we delete your personal information, subject to some exceptions under applicable law. Once we have received and confirmed your request, we will delete (and direct our partners and service providers to delete) your personal information, unless an exception under applicable law applies. You have the right to not receive discriminatory treatment for exercising your deletion right. To submit a request or designate an authorized agent to make a request, please <u>contact us</u> using the information below.

Updating your personal information

You have the right to request that we update or correct the personal information we collect. You also have the right to not receive discriminatory treatment for exercising your correction right. To submit a request to update or correct your information, please <u>contact us</u> using the information below.

Verification Process and Required Information

The above requests must be verified. This process may require us to request additional personal information from you, including, but not limited to, your email address, mailing address, username, and/or date of last interaction with us. In certain circumstances, we may decline a request to exercise a privacy right, particularly where we are unable to verify your identity. If you wish to appeal a decision regarding your request, please <u>contact us</u> using the information below.

You may designate an authorized agent to make a request on your behalf. An authorized agent must have written documentation of their authority to act on your behalf, such as receiving: (i) a power of attorney; or (ii) sufficient evidence to show that the individual has provided the authorized agent signed permission to act on their behalf, verified the individual's own identity directly with us pursuant to the procedures above, and directly confirmed with us the individual provided the authorized agent permission to submit the request on their behalf.

Email Communications / Direct Marketing

You may have the opportunity to receive certain communications from us related to our Services. If you provide us with your email address in order to receive communications, you can opt-out of marketing emails at any time by following the instructions at the bottom of our emails and adjusting your email preferences. Please note that certain emails may be necessary for the operation of our Services. You will continue to receive these necessary emails, if lawful and appropriate, even if you unsubscribe from our optional marketing communications.

Cookies / Beacons

If you wish to minimize information collected by cookies or beacons, you can adjust the settings of your device or browser. You can also set your device or browser to automatically reject any cookies. You may also be able to install plug-ins and add-ins that serve similar functions. However, please be aware that some Services may not work properly if you reject cookies. In addition, the offers we provide when you visit us may not be as relevant to you or tailored to your interests. For more information about how our Services use cookies, please see our Cookie Notice.

Network Advertising Initiative

Certain websites you visit may provide options regarding advertisements you receive. If you wish to minimize the amount of targeted advertising you receive, you can opt-out of certain network advertising programs through the Network Advertising Initiative (NAI) Opt-Out Page or through the Digital Advertising Alliance Opt-Out Tool. Please note that even if you choose to remove your personal information (opt-out) you will still see advertisements while you're browsing online. However, the advertisements you see may be less relevant to you. For more information or to opt-out of certain online behavioral advertising, please visit http://www.aboutads.info.

Additionally, many advertising network programs allow you to view and manage the interest categories that they have compiled from your online browsing activities. These interest categories help determine the types of targeted advertisements you may receive. The NAI Opt-Out Page provides a tool that identifies its member companies that have cookies on your browser and provides links to those companies.

Do Not Track

Some devices and browsers support a "Do Not Track" (or, DNT) feature, a privacy preference that you can set in certain browsers, which is intended to be a signal to websites and services that you do not wish to be tracked across different websites or online services you visit.

Please note that we cannot control how third party websites or online services you visit through our website respond to Do Not Track signals. Check the privacy policies of those third parties for information on their privacy practices. Our Services do not currently change the way they operate upon detection of a <u>Do Not Track</u> or similar signal.

10. THIRD PARTY WEBSITES AND APPS

Our website and Services may contain links to other websites or apps operated by third parties. Please be advised that the practices described in this Privacy Notice do not apply to information gathered through these third party websites and apps. We have no control over, and are not responsible for, the actions and privacy policies of third parties and other websites and apps.

11. CONTACT US

We welcome requests, questions, comments, and feedback on this Privacy Notice and our management of personal information. If you have requests, questions, concerns, or feedback, you can always contact us in the following ways. For your protection, we may need to verify your identity before assisting with your request, such as verifying that the information used to contact us matches the information that we have on file.

Email	info@jointhetrades.com
Mail	11654 Plaza America Drive #605
	Reston, VA 20190

California Privacy Law Appendix

This appendix seeks to provide additional information to residents of California and supplements the information provided in the Privacy Notice above.

To learn more about the categories of personal information we collect, how we collect it, why it is collected, with whom we share the information, and how long we retain it, please see the chart below.

Category	What we collect	How we collect it	Why we collect it	With whom we share it	How long we retain it
Identifiers	email address, phone number, payment information, and other		for the purposes listed in the <u>How We Use</u>	affiliates, partners, vendors, and service providers as described in the <u>How We Share</u> <u>Information</u> section above.	We retain information for as long as necessary for the purpose for which it was initially collected, including the purposes listed in the <u>How We Use</u> <u>Information</u> section above.
Protected classification characteristics under California or federal law	Not collected.	N/A	N/A	N/A	N/A
Commercial information	information such as the job openings you	when you directly provide it to us, through your use of our Services, or from	for the purposes listed in the <u>How We Use</u>	affiliates, partners, vendors, and service providers as described in the <u>How We Share</u> <u>Information</u> section above.	We retain information for as long as necessary for the purpose for which it was initially collected, including the purposes listed in the <u>How We Use</u> <u>Information</u> section above.
Biometric information	Not collected.	N/A	N/A	N/A	N/A
Internet or other similar network activity	and version, browser plug-in types and versions, operating	directly provide it to us,		affiliates, partners, vendors, and service providers as described in the <u>How We Share</u> <u>Information</u> section above.	We retain information for as long as necessary for the purpose for which it was initially collected, including the purposes listed in the <u>How We Use</u> <u>Information</u> section above.

	Information We Collect section above.				
Geolocation data	Not collected.	N/A	N/A	N/A	N/A
Sensory data	Not collected.	N/A	N/A	N/A	N/A
Professional or employment-related information	history, and other employment-related information that would	when you directly provide	for the purposes listed in the <u>How We Use</u>	information for the purposes listed in the <u>How We Use</u> <u>Information</u> section above.	We retain information for as long as necessary for the purpose for which it was initially collected, including the purposes listed in the <u>How We Use</u> <u>Information</u> section above.
Non-public education information	certifications.	Collected online or offline when you directly provide it to us, through your use of our Services, or from third parties.	for the purposes listed in the <u>How We Use</u> Information section above.	information for the purposes listed in the <u>How We Use</u> <u>Information</u> section above.	We retain information for as long as necessary for the purpose for which it was initially collected, including the purposes listed in the <u>How We Use</u> <u>Information</u> section above.
Inferences drawn from other personal information	from your use of our Services reflecting your preferences.	when you directly provide	for the purposes listed in the <u>How We Use</u>	affiliates, partners, vendors, and service providers as described in the <u>How We Share</u> <u>Information</u> section above.	We retain information for as long as necessary for the purpose for which it was initially collected, including the purposes listed in the <u>How We Use</u> <u>Information</u> section above.
Sensitive personal information	information.		We collect this information for the purposes listed in the <u>How We Use</u> <u>Information</u> section above.	vendors, and service providers as described in the <u>How We Share</u> <u>Information</u> section above.	We retain information for as long as necessary for the purpose for which it was initially collected, including the purposes listed in the <u>How We Use</u> <u>Information</u> section above.