

# JACOBSON

## Website Privacy Policy

Last modified: May 4, 2020

### Introduction

The Jacobson Group ("Jacobson" or "We") respects your privacy and is committed to protecting it through our compliance with this policy. This policy describes the types of information we may collect from you or that you may provide when you visit the website [jacobsononline.com](http://jacobsononline.com) (our "Website") and our practices for collecting, using, maintaining, protecting, and disclosing that information. It also explains your rights in relation to your personal information and how to contact us in the event you have a complaint.

### When This Policy Applies

This policy applies to information we collect:

- On this Website.
- In email, text, and other electronic messages between you and this Website.
- Through mobile and desktop applications you download from this Website, which provide dedicated non-browser-based interaction between you and this Website.
- In connection with any of our events, marketing, advertising, and recruitment activities, or in the course of providing services to you.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by any third party; or
- Any third party that we do not own or control, including through any application or content that may link to or be accessible from the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, you may choose not to use our Website. By accessing or using this Website, you agree to this privacy policy. This policy may change from time to time (see [Changes to Our Privacy Policy](#)). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

## Information We Collect About You

Our Website collects information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("**personal information**"). In particular, our Website has collected the following categories of personal information from its consumers within the past twelve (12) months:

Category of Personal Information	Types of Personal Information	Business Purposes
<b>A. Identifiers.</b>	<p><b>Identifying Information:</b> includes name, username and password, and Internet Protocol address.</p>	<p>We use this personal data:</p> <ul style="list-style-type: none"> <li>• to create, manage, and administer your relationship with us;</li> <li>• to assess your suitability for employment and employ individuals;</li> <li>• to match candidates with potential positions;</li> <li>• to offer candidates placement at our customers;</li> <li>• to refer an individual for employment to one of our customers;</li> <li>• for making contact in an emergency;</li> <li>• for ensuring that our systems are used primarily for business purposes, have sufficient capacity for the needs of the business, and are protected against cybersecurity threats such as malware;</li> <li>• to meet our contractual obligations when we act as an employer, employment agency, or recruiter;</li> <li>• to contact individuals via regular mail, e-mail, phone, text messages, and online communication platforms about our company or job openings that match the individual's stated preferences, qualifications, and/or profile; these communications will only come directly from Jacobson (or agents working on behalf of Jacobson);</li> <li>• for the purposes of any potential and/ or actual litigation or investigations concerning us;</li> <li>• to present our Website and its contents to you;</li> <li>• in any other way we may describe when you provide the information;</li> <li>• for any other purpose with your consent; and</li> <li>• to personalize and deliver content about our services to individuals. For example, where individuals share geolocation data with us, this will allow the individual to search for jobs or create job alerts within that geographic area.</li> </ul>
	<p><b>Contact Information:</b> includes e-mail address, telephone number, postal address, and contact information of referrals, references, or emergency contacts</p>	
<b>B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</b>	<p><b>Professional Information:</b> includes information on your resume or C.V., name, address, telephone number, education, current employment, employment history, certifications, language proficiencies, awards, security clearance information, work authorization, and other work-related skills</p>	

## **How We Collect Information About You**

### **INFORMATION YOU PROVIDE TO US**

The information we collect on or through our Website may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of subscribing to our service, or requesting further services.
- Records and copies of your correspondence (including email addresses), if you contact us.

### **INFORMATION WE COLLECT THROUGH AUTOMATIC DATA COLLECTION TECHNOLOGIES**

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

We use cookies (or browser cookies) for this automatic data collection. A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.

## **Disclosure of Your Information**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction. We routinely share personal information with:

- Our affiliates, including companies within The Jacobson Group.
- Contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations and/or if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of The Jacobson Group, our customers, or others.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. We will typically anonymize information, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

## **Data Retention**

We retain personal information we collect from you where we have an ongoing business need to do so (for example, to provide you with the service you have requested or to comply with applicable legal requirements).

When we have no ongoing business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## Your Privacy Rights and Choices

With respect to your right to access and control your information, we comply with applicable data protection laws and regulations. We will process your rights requests in compliance with applicable data protection laws and regulations. The availability of these rights and the ways in which you may exercise them are set out below.

### CALIFORNIA CONSUMER RIGHTS

For individuals located in California, you are given rights under the California Consumer Privacy Act (the “CCPA”) about your personal information. You have the following rights:

- **Right to be Informed about Collection, Sale, or Disclosure:** You have the right to be informed of the categories of personal information we collect about you as well as the sources from which personal information was collected. You also have the right to be informed of the business or commercial purposes for which we use or disclose, or sell your personal information as well as the categories of third parties with whom we share it. Please note, Jacobson does not sell your information.
- **Right of Access and to Obtain a Copy of Your Personal Information:** You have the right to request access to and a copy of your personal information that we collected over the previous twelve months.
- **Right of Deletion:** You have the right to request that we delete personal data that we collected from you, subject to certain exceptions.
- **Right to Opt-out of the Sale of Personal Information:** Jacobson does not sell personal information to third parties.
- **Right Not to Be Discriminated Against for Exercising These Rights:** You have the right to be free of discrimination for exercising your consumer privacy rights. We will not deny you services, charge different amounts or provide a different quality level of services for exercising your rights unless the difference is reasonably related to the value of your data.

### OTHER JURISDICTIONS

Under the laws of some jurisdictions you may have the right to request additional information about the personal data we collect, request access to the personal data we process, correct an error or omission, delete personal data, or object or limit further processing. We will respect individual rights requests under those laws.

Additionally, if we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. This will not affect any processing of your personal information done before you withdrew your consent.

## Accessing and Correcting Your Information

If you would like to exercise your privacy rights, please e-mail your request to [legal@jacobsononline.com](mailto:legal@jacobsononline.com).

To protect your privacy and security, we may take steps to verify your identity. We will abide by all applicable legal requirements for deadlines for responding to your request.

## **Data Security**

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorized way. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## **Children's Privacy**

This site is not intended for use by children under the age of 13. We do not knowingly collect personal information from children under the age of 13. If we learn that we have collected personal information from a child under the age of 13, we will delete that data from our systems.

## **Changes to Our Privacy Policy**

It is our policy to post any changes we make to our privacy policy on this page with a notice that the privacy policy has been updated on the Website home page. If we make material changes to how we treat our users' personal information, we will notify you through a notice on the Website home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for periodically visiting our Website and this privacy policy to check for any changes.

## **Contact Information**

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

Legal Department  
The Jacobson Group  
30 West Monroe, Floor 15  
Chicago, Illinois 60603  
Or email – [legal@jacobsononline.com](mailto:legal@jacobsononline.com)