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San Francisco Bay Area | New York | Seattle  
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## Blueback Global Inc. Privacy Policy

**Effective May 22, 2018**

**Updated: January 4, 2022**

Blueback Global Inc. (“Blueback Global”, “we”, or “us”) recognizes the importance of privacy. We want you to feel confident using our websites (collectively, the “Site”), and this Privacy Policy (“Policy”) is to help you understand and describe how we collect, use, and disclose information that we obtain about users of the Site, content, information, and other downloadable materials (all of which we refer to as the “Site Content”).

This Policy describes the following:

- What information we collect and how it is collected;
- How we use information we collect;
- With whom we may share information;
- Legal basis for processing information;
- Your rights and choices;
- Security and storage of information;
- Third party websites;
- Users outside the United States;
- California disclosures; and
- Changes to this Policy and how to contact us.

Generally, Blueback Global Inc. is the data controller of the personal information collected on our website. We dictate the purposes and manner by which your personal information is collected and used. In certain instances, other Blueback entities, such as Blueback Global UK Ltd, may use your personal data for its own purposes, and as such, that Blueback entity is the controller with respect to such uses. To the extent that an Blueback entity uses your personal data for such uses, the terms set out in this notice will also apply to such uses.

### **A. Information We Collect**

We collect information about you directly from you and automatically through your use of our Site Content. We may combine information automatically collected with other information that we have collected about you including from publicly available sources.

In order to help you protect yourself and your information, we encourage you to provide only that information that is necessary for using our Site Content. For example, to make inquiry, you only need to provide us with a name, email address and phone number and brief description of your inquiry.

Our website is not directed to children under sixteen (16) years or age and we do not knowingly collect personal information from children under 16. If we discover that a child under 16 has provided us with personal information, we will promptly delete such personal information from our systems.



## **B. Information You Provide Voluntarily**

1. **Inquiry.** When you submit an inquiry through any “contact us” facility provided via our website, you voluntarily give us certain information. This can include your name, email address and phone number; email addresses of other people; subject of the meeting; and any other information you provide us.
2. **Replies to a Blog.** When a Blueback Global User comes to our website and leaves a reply through our form on one of our blog posts, you voluntarily give us certain information. This can include your name and email address, and any other information you provide us.
3. **Job Applicants.** If you apply to a job with us or register as a candidate for recruitment by our clients, you will be required to provide certain information. To complete an application through our website, you must provide your full name and email address, a contact number (and an alternate contact number). We also request that you upload a resume (which may include information about your employment and education history). If you provide us with references, you agree that you have permission from the reference to provide us with such information and for Blueback Global to contact the reference.

## **C. Information Collected Automatically**

Like many websites, we and our service providers may use cookies, web beacons and other technologies to receive and store certain types of information when you interact with us through your computer or mobile device subject to your opt-out preferences (see “Your Rights and Choices” section below). Using these technologies helps us customize your experience with our Services, improve your experience, and tailor marketing messages. Here are some of the types of information we may collect:

1. **Log & Device data.** When you use our website, unless restricted, our servers automatically record information (“log data”), including information that your browser sends whenever you visit our Website. This log data may include your web address you came from or are going to, your device model, operating system, browser type, unique device identifier, IP address, mobile network carrier, and time zone or location. Whether we collect some or all of this information often depends on what type of device you’re using and its settings. For example, different types of information are available depending on whether you’re using a Mac or a PC, or an iPhone or an Android phone. To learn more about what information your device makes available to us, please check the policies of your device manufacturer or software provider.
2. **Cookies and Other Tracking Mechanisms**  
**Cookie data.** Depending on how you’re accessing our products and subject to your opt-out preferences, we may use “cookies” (a small text file sent by your computer each time you visit our website, unique to your registered account or your browser) or similar technologies to record log data. When we use cookies, we may use “session” cookies (that last until you close your browser) or “persistent” cookies (that last until you or your browser delete them). For example, we may use cookies to keep you logged in to the website. Some of the cookies we use are associated with your registered account (including personal information about you, such as the email address you gave us), and other cookies are not. To help us make emails more useful and interesting, we often receive a confirmation when you open email from us if your computer supports such capabilities. You can opt out of receiving emails from us. Please see the “Your Rights and Choices” section below.



3. Other Web Site Analytics Services. Subject to your opt-out preferences (see “Your Rights and Choices” below), we use third party service providers such as Google Analytics to provide certain analytics and user interactions services to Blueback Global in connection with our operation of our Site Content, including the collection and tracking of certain data and information regarding the characteristics and activities of visitors to our website. You may opt-out of Google Analytics’ and Mixpanel’s cookies using Opt-Out Features on their respective websites.

#### **D. Information We Receive from Third Parties**

In addition to information we collect from you, we may receive information about you (including personal information) from third parties. Please also note that if you are on another website and you opt-in to receive information from us that website will forward to us your email address and other information about you so that we may contact you as requested.

#### **E. How We Use Your Information**

We may use information that we collect about you, including personal information, to:

1. Provide services requested by you via our website. We will use your information to provide those website functions and services to you; to facilitate a discussion; to respond to your inquiries; and for other customer service and support purposes.
2. Understand and improve our products. We will perform research and analysis about your use of, or interest in, our products, services, or content, or products, services or content offered by others. We do this to help make our products better and to develop new products.
3. Communicate with you. We will use your information to communicate with you, including responding to your requests for information from us.
4. Promotional. Subject to your opt-out preference, we may send you emails about new features or other news about us or on topics we think would be relevant to you. You may opt out of receiving these communications at any time. Visit the “Your Rights and Choices” section below.
5. Respond to your requests. We will also use your information to respond to your questions or comments.
6. Provide administrative functions. We may contact you to inform you about changes in our services, our service offering and other important service-related notices, such as changes to the Policy.
7. Advertise. Subject to your opt-out preferences, we may develop and display content and advertising tailored to your interests on our services and other sites. See “Your Rights and Choices” below.
8. Protect Rights and Interests. We will use your information to protect our rights and interests as well as the rights and interests of our users and any other person, as well as to enforce this Policy.



9. Comply with laws. We may use your information to comply with applicable legal or regulatory obligations, including informal requests from law enforcement or other governmental authorities.

#### **F. With Whom We May Share Your Information**

We do not share your personal information with others except as indicated within this Policy or when we inform you and give you an opportunity to opt out of having your personal information shared.

We will share information we collect about you, including personal information, in the following ways:

1. With third party service providers, agents, or contractors. We may use other companies, agents, contractors ("Service Providers"), or business partners to perform services on our behalf or to assist us with providing services to you. For example, we may engage Service Providers to provide services such as marketing, advertising, communications, infrastructure and IT services, to provide customer service, and to analyze and enhance data (including data about users' interactions with our service). These Service Providers may have access to your personal or other information in order to provide these functions. In addition, some of the information we request may be collected by third party providers on our behalf. We require our Service Providers to agree to take reasonable steps to keep the personal information that we provide to them secure. We do not authorize them to use or disclose your personal information except in connection with providing their services.
2. Affiliates. We may disclose your information to current or future affiliates or subsidiaries for research, marketing, and other purposes consistent with this Policy.
3. To comply with legal processes or to protect our companies and our users and clients. We may share your data: if we believe that disclosure is reasonably necessary to comply with a law, regulation, legal or governmental request; to respond to a subpoena, court order, warrant, or other legal process; to enforce applicable terms of use or this Policy, including investigation of potential violations thereof; to protect the safety, rights, or property of the public, any person, or us; to detect, prevent, or otherwise address, security, or technical issues or illegal or suspected illegal activities (including fraud); or as evidence in litigation in which we are involved, as part of a judicial or regulatory proceeding.
4. Business Transfers. We may engage in a merger, acquisition, bankruptcy, dissolution, reorganization, or similar transaction or proceeding that involves the transfer of the information described in this Policy. In such transactions, customer information is typically one of the business assets that is transferred or acquired by a third party. If we are acquired by or merged with another company, if we sell or transfer a business unit or assets to another company, in the unlikely event of a bankruptcy proceeding, or as part of any other similar business transfer, you acknowledge that such transfers may occur.
5. Other Networks. If you choose to share Site Content to other apps or social networks such as Facebook, Google+, Tumblr or Twitter, you will be sharing certain information with these apps or networks. In the case of Facebook, Google+, Tumblr or Twitter, any Site Content that you share on our website will be shared to those networks and will be visible to your followers and friends on those networks. We are not responsible for these other networks, so please make sure you only connect your account with apps or services that you trust. For information on



how to control the information that you share, and how to disconnect your account from other networks or apps, please see the “Your Rights and Choices” section below.

6. **Aggregate or De-identified Information.** We may disclose aggregate, anonymous, or de-identified information about users for marketing, advertising, research, compliance, or other purposes.
7. **Other.** We also may use your information to manage our business or perform functions as otherwise described to you at the time of collection subject to your consent. Please read all online agreements carefully before accepting them.

### **G. Legal Basis for Processing Your Information**

With respect to personal information that is subject to the European Union’s General Data Protection Regulation (the “GDPR”), our legal basis for collecting and using your personal information depends on the type of personal information and the purpose for which we collect it. We rely on the following legal grounds to process your personal information:

1. **Consent.** We may use your personal information as described in this Policy subject to your consent. To withdraw your consent, please contact us. You may also refrain from providing, or withdraw, your consent for cookies. Please see “Your Rights and Choices” below for more information on opt-outs.
2. **Contract.** In certain instances, we may process your personal information pursuant to a contract between you and us or to comply with our legal obligations.
3. **Legitimate Interests.** We may use your personal information for our legitimate interests to provide services requested by you from our website and to improve our services and the content on our website for you. We may use technical information as described in this Policy and use personal information for our marketing purposes consistent with our legitimate interests and any choices that we offer or consents that may be required under applicable law.

### **H. Your Rights and Choices**

1. **E-mail.** As described above, if you do not wish to receive promotional emails from us, you may opt out at any time by following the opt-out link contained in the email itself. Please note that it may take up to ten (10) days to process your request. Please also note that if you opt out of receiving marketing communications from us, we may continue to send to you service-related emails which are not available for opt-out. If you do not wish to receive any service-related emails from us, you have the option to deactivate your account.
2. **Cookies.** You may also refrain from providing, or withdraw, your consent for cookies. Your browser’s help function should contain instructions on how to set your computer to accept all cookies, to notify you when a cookie is issued, or to not receive cookies at any time.
3. **Third Party Analytics Services.** Some of the services used provide the ability to opt-out. You may opt-out of Google Analytics’ and Mixpanel’s services using Opt-Out Features on their respective websites.



The Google Analytics service is provided by Google Inc. You can opt-out from Google Analytics service from using your information by installing the Google Analytics Opt-out Browser tool: [www.tools.google.com/dlpage/gaoptout](http://www.tools.google.com/dlpage/gaoptout). For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: [www.google.com/policies/privacy](http://www.google.com/policies/privacy).

Mixpanel is provided by Mixpanel, Inc. You can prevent Mixpanel from using your information for analytics purposes by opting out at [www.mixpanel.com/optout](http://www.mixpanel.com/optout). For more information on what type of information Mixpanel collects, please visit the Mixpanel's Terms of Use page at [www.mixpanel.com/terms](http://www.mixpanel.com/terms).]

4. **GDPR Rights.** If your personal information is protected by the GDPR, you have certain data protection rights described below with respect to the personal information collected and used by our website. These rights may only apply in certain circumstances and are subject to certain exemptions. You can exercise these rights using the contact details at the end of this Privacy Policy. The rights are as follows:
- To receive a copy of your personal information that we hold about you.
  - To ask us to correct or delete your personal information.
  - To restrict our use of your personal information.
  - To object to our use of your personal information.
  - To ask us to transfer your personal information to another organization where it is technically feasible.
  - To withdraw your consent at any time where we rely on consent to use your personal information.
  - To complain to the relevant data protection authority where you think we have not used your personal information in accordance with data protection law.

### **I. Security and Storage of Information**

We have taken reasonable steps to help protect the personal information we collect. Unfortunately, no measures can be guaranteed to provide 100% security. Accordingly, we cannot guarantee the security of your information in all circumstances.

You should take steps to protect against unauthorized access to your device by, among other things, choosing a robust password that nobody else knows or can easily guess and keeping your log-in and password private. We are not responsible for any lost, stolen, or compromised passwords or for any activity our website via unauthorized password activity.

We retain the personal data we collect for so long as reasonably necessary to fulfill the purposes for which the data was collected, to perform our contractual and legal obligations, and for any applicable statute of limitations periods for the purposes of bringing and defending claims.

### **J. Third-Party Links**

Our website may contain links to third-party websites and applications. Subject to your opt-out preferences (see "Your Rights and Choices" section above), we may also use third-party advertisers, ad networks, and other advertising, marketing, and promotional companies, to serve advertisements on our website. Any access to and use of such linked websites and applications is not governed by this Policy but instead is governed by the privacy policies of those third parties. We do not endorse these parties, their content, or any products and services they offer, and we do not endorse these parties,



their content, or any products and services they offer, and we are not responsible for the information practices of such third-party websites or applications.

#### **K. Users Outside the USA**

If you are an individual located in the European Union/European Economic Area (EU/EEA), the United Kingdom, Canada or another jurisdiction outside of the United States with laws and regulations governing personal data collection, use, and disclosure that differ from United States laws, please be aware that information we collect (including through the use of methods such as cookies and other web technologies) will be processed and stored in the United States or in other countries where we or our third-party services providers have operations. Data hosting within and outside your country of residence may be accessed by our employees, including those in the U.S., United Kingdom, Singapore and Hong Kong. The United States has not received an “adequacy decision” from the European Commission, which means that the data protection laws of the United States may not offer the same protections as the country in which you reside when you provide information to us. By submitting your personal information to us and using our website, you understand that your personal data will be transferred to, processed, and stored in the United States or another jurisdiction which may not offer the same level of privacy protection as those in the country where you reside or are a citizen. We take appropriate measures to ensure that any such transfers comply with applicable data protection laws and that your data remains protected to the standards described in this Policy.

#### **L. California Disclosures**

1. California Information-Sharing Disclosure. California residents may request a list of all third parties with respect to which we have disclosed any information about you for direct marketing purposes and the categories of information disclosed. If you are a California resident and want such a list, please send us a written request by email to [connect@Bluebackglobal.com](mailto:connect@Bluebackglobal.com) with “California Privacy Rights” in the subject line.
2. Do Not Track. We do not currently recognize or respond to browser initiated Do Not Track signals as there is no consistent industry standard for compliance. More information about “do not track” is available at [www.allaboutdnt.org](http://www.allaboutdnt.org) concerning such information.
3. Third-Party Tracking. Third parties, other than our service providers (such as our website analytics provider), do not have our permission to track which websites you visited prior to and after visiting our website. That said, we cannot control third-party tracking and there may be some third-party tracking that occurs without our knowledge or consent.

#### **M. Changes to the Policy**

This Policy is current as of **January 4, 2022**. We may change this Policy from time to time, and if we do, we will post any changes, including any material changes, on this page, so please be sure to check back periodically. If you continue to use our website after those changes are in effect, you agree to the revised Policy.

#### **N. Changes to the Policy**

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## O. Contacting Us

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