



**EAB GLOBAL, INC.
PRIVACY NOTICE – CAREERASCENT**

Last Updated: June 29, 2023

1. EAB and Our Commitment to Your Privacy

Who Is EAB? EAB Global, Inc. (together with its subsidiaries and its affiliates, “EAB”, “us,” “we,” and “our”) is a data driven research, technology, and services organization partnering with education and corporate leaders, practitioners, and staff to accelerate progress and drive results in the most pressing and complex issues facing educational institutions and corporations.

EAB’s Commitment to Privacy. EAB is deeply committed to maintaining the privacy and security of personal information we collect or which is provided to us directly by our clients. EAB’s general privacy policy can be found [here](#).

Scope of this Privacy Notice. This Privacy Notice governs our processing of personal information in connection with our CareerAscent platform. This Privacy Notice does not relate to anonymized, aggregated, or de-identified data, or any other information that does not allow us to identify you.

Data Controller. EAB Global, Inc. is the data controller in relation to the data processing activities described in this Privacy Notice.

Updates to this Privacy Notice. From time to time, this Privacy Notice may be updated to reflect changes to our products and services, the way we operate, or to meet new legal and regulatory requirements. You will find the latest version of this Privacy Notice [here](#).

2. Personal Information That We Collect

The type of personal information we collect about you depends upon your relationship with us. Please click on the plus symbol to collapse or expand the relevant section below to learn more. The other sections in our Privacy Notice apply to all our activities.

+ Prospective Candidate

If you are a prospective candidate who would like to sign up and use our services, we will collect certain personal information from you to provide you with the services.

We collect personal information in the following manner:

- **Directly from you:** When you sign up to use our services, we will ask for the following information: full name, preferred name, email address, residential address, date of birth, telephone number, current or most recent school and date of graduation, grades, work experience, extracurricular activities, athletics, hobbies and interests, licenses, certifications, career preferences, skills, knowledge, abilities, and certain voluntary self-identification information, including gender, race, ethnicity, veteran status, disability status, religion, gender and sexual orientation identity. We consider some of this information to be necessary for us to provide you the services, for example your name, and this will be shown to you when providing the information. The remaining information is provided on voluntary basis and therefore it is your choice whether you would like it to form part of your profile.

In addition, you may choose to upload a video interview with a third-party provider and upload such interview as part of your profile. As this will be video recorded, it will include your image and may include further personal information about you depending on the answers you provide to the questions.

- **Indirectly from you:** We collect information about the pages you visit and how you access and use our services using cookies and third-party analytics tools (e.g.,

log files, event data, GPS data, clear gifs and scripts). This information includes information about the device(s) you use to access the service including unique device identifiers, IP address, operating system, browser, internet service provider, referring/exit pages, clickstream data and cookies. Depending on your device settings, we may also collect information about your geographical location. Learn more about our use of cookies, plugins, analytics or similar tools in our [Cookie Notice](#).

- **Sensitive Information.** We may obtain information relating to your race or ethnic origin, gender or gender identity, and details of any criminal convictions you may have, where we are permitted to do so by law or where you give your consent.

+ **Employer Representative or Contact**

If you are a representative or contact of employer, we will collect certain personal information from you as part of this relationship.

We collect personal information in the following manner:

- **Directly from you:** When you engage with us, we may collect the following information: full name, email address, telephone number, organization you represent, the location of the organization you represent, and job title.
- **Indirectly from you:** We collect information about the pages you visit and how you access and use our services using cookies and third-party analytics tools (e.g., log files, event data, GPS data, clear gifs and scripts). This information includes information about the device(s) you use to access the service including unique device identifiers, IP address, operating system, browser, internet service provider, referring/exit pages, clickstream data and cookies. Depending on your device settings, we may also collect information about your geographical location. Learn more about our use of cookies, plugins, analytics or similar tools in our [Cookie Notice](#).

+ **Website Visitor**

EAB maintains websites that are generally accessible by the public. Our websites provide general information about our company and its products and services. We may do this directly or through third party vendors.

You can generally visit our websites without having to register or otherwise identify yourself. You may need to log in to make use of all the functionalities and be able to communicate with us or other EAB clients.

We collect personal information in the following manner:

- **Directly from you:** Certain functionality on our website requires you to register for an account (e.g., become an authorized user, or sign up for events). We also collect information you provide by completing forms on our website. If you provide additional content through user forums, chat tools or personal correspondence, for example, we may link this information with your personal information if you are logged in.
- **Indirectly from you:** We collect information about the pages you visit and how you access and use our services using cookies and third-party analytics tools (e.g., log files, event data, GPS data, clear gifs and scripts). This information includes information about the device(s) you use to access the service including unique device identifiers, IP address, operating system, browser, internet service provider, referring/exit pages, clickstream data and cookies. Depending on your device settings, we may also collect information about your geographical location. Learn more about our use of cookies, plugins, analytics or similar tools in our [Cookie Notice](#).

3. How We Use the Personal Information That We Collect

+ Prospective Candidate

EAB collects, retains, processes, uses, and transfers your personal information for the following purposes:

- **Providing our Services:** we collect the personal information listed above so we can provide our services to you. This includes being able to set up your account, express your interest in employers, and submit applications. In doing so, we will share certain personal information with organizations (please see further information below on sharing personal information). We process personal information for these purposes because it is necessary to perform a contract with you or because we have a legitimate interest in providing services that you request.
- **Communicate with Organizations:** we collect personal information you provide in the context of your use of the service's chat function in order to facilitate your communications with organizations. We process personal information for these purposes because we have a legitimate interest in providing the functionality to our users.

+ Employer Representative or Contact

EAB collects, retains, processes, uses, and transfers your personal information for the following purposes:

- **Relationship:** we collect the personal information listed above so we can facilitate the relationship we have with you. For example, if you represent an employer, we require your personal information to provide you access to the employer's account to view applications from prospective candidates. We process personal information for these purposes because we have a legitimate interest in managing relationships with employers.
- **Communicate with Prospective Candidates:** we collect personal information you provide in the context of your use of the service's chat function in order to facilitate your communications with prospective candidates. We process personal information for these purposes because we have a legitimate interest in providing the functionality to our users.

+ Website Visitor

EAB collects, retains, processes, uses, and transfers your personal information for the following purposes:

- **Providing our Services:** we collect the personal information listed above so we can provide our website services to you. For example, if you contact us to act as a question, we will use your personal information to respond to you. We process personal information for these purposes because we have a legitimate interest in making our website and services available to website visitors.

+ All

EAB collects, retains, processes, uses, and transfers your personal information for the following purposes:

- **Analytics and Marketing:** we analyze usage information for marketing purposes and for trends about our visitors' demographics and use of our website. This analysis is necessary to further our legitimate interest in understanding our users and how they interact with us and our website, improving our website and communicating with you. You can learn more about our use of cookies in our [Cookie Notice](#).
- **Product Enhancements and Research:** to the extent permitted by applicable law or by agreement, we may also use:

- your personal information to evaluate and improve our products and services to develop new products and services;
- your personal information to tailor your experience on our websites; and/or
- de-identified information for research or business purposes like providing similarly-situated organizations a benchmarking data report on recruitment data.
- **Client engagement and marketing:** EAB may use your information for client engagement and marketing purposes in limited circumstances, including:
 - to manage the client relationship, including for notification of product updates and maintenance, and similar purposes;
 - to promote EAB's products and services.
 - to share with EAB's subsidiaries or affiliates.

We do not disclose personal information about prospective candidates that we collect through the provision of our recruitment services to third parties for behavioral targeting of advertisements to students.

Our marketing emails will include a link so that you can opt-out of receiving marketing communications from us. You can do this by clicking on the "Unsubscribe" link in the email footer.

4. How We Share the Personal Information That We Collect

If you are a candidate, we will share the following information with your with employers:

- If, following review of your profile, the organization makes you a formal interview offer and you are interested in pursuing such interview, the organization requires that we share further personal information with them, including:
 - Contact information
 - Race and ethnicity
 - Address
 - Criminal history
- We will only share your sensitive personal information, and information relating to criminal convictions and offences, with organizations if you give explicit consent. Please note, however, that it may be necessary to share sensitive personal information with some employers if you wish to accept an offer.

Please note that when we share any personal information with an employer, they will be responsible for any further processing of such information.

Candidates agree and acknowledge that EAB may report back to your higher ed institution of record metrics regarding your engagement with the CareerAscent site which may include profile completion, recommendations received, interviews extended, and interviews accepted.

We may share your personal information with:

- Other EAB entities;
- Organizations with which you want to share your personal information; and
- Service providers that perform services on our behalf.

Details of the other entities in the EAB group, including the countries in which they are located, can be found [here](#).

We may share personal information with service providers that perform services on our behalf such as hosting providers and our help support provider. In accordance with applicable law, we have entered into legally binding agreements requiring them to use or disclose personal information only as necessary to perform services on our behalf or comply with applicable legal requirements.

In addition, we may disclose personal information about you (a) if we are required or permitted to do so by law or legal process, for example due to a court order or a request from a law enforcement agency, (b) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, (c) in connection with an investigation of suspected or actual fraudulent or other illegal activity, and (d) in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganization, dissolution, or liquidation).

5. Children's Privacy

EAB's products and services are not intended for children under the age of 13, and we do not knowingly collect any information from children. If we learn that we have collected or received personal information from a child under 13, we will delete that information upon request. Please contact us at privacy@eab.com if you believe we have inadvertently collected personal information from a child under 13.

6. How Long We Retain the Personal Information That We Collect

Your personal information is retained for the duration of your relationship with EAB, plus a reasonable period thereafter as necessary to fulfil the purposes described above. Retention periods may be extended if we are required to preserve your personal information in connection with litigation, investigations and proceedings, or if a longer retention period is required or permitted by applicable law.

7. Your Rights and Choices

Subject to applicable law, you may have the right to request:

- confirmation of whether we process personal information relating to you and, if so, to request a copy of that personal information;
- that we correct or update your personal information that is inaccurate, incomplete or outdated;
- that we stop processing your personal information in certain circumstances, such as where you object to our processing of your personal information on grounds relating to your particular circumstances;
- that we erase your personal information in certain circumstances, such as where we collected personal information on the basis of your consent and you withdraw that consent;
- that we restrict the use of your personal information in certain circumstances, such as while we consider another request that you have submitted, for example a request that we update your personal information;
- withdrawal of your consent where you have given us consent to process your personal information; and
- that we provide a copy of your personal information to you in a structured, commonly used and machine readable format in certain circumstances.

If you wish to exercise any of the rights described above in relation to your personal information, or if you consider that we have processed your personal information in violation of applicable law, please contact us as detailed in the 'Contact Us' section below.

If you consider that we have processed your personal information in violation of applicable law and failed to remedy such violation to your reasonable satisfaction, you may also lodge a complaint with the data protection supervisory authority in your country.

8. Security

In order to protect personal information, EAB has established a data privacy program based on the 'privacy by design' framework which proactively embeds privacy protection into the design of EAB.com's systems, networked infrastructure, business practices, and software applications. We employ a variety of physical, administrative, and technological safeguards designed to protect personal information against loss, misuse, and unauthorized access or disclosure. We have a dedicated information security program and work to continuously enhance our technical and operational security measures.

Specifically, EAB aligns its policies with the NIST Cybersecurity Framework. We maintain a comprehensive list of policies and procedures that are readily accessible by all workforce clients via an internal portal. Information is encrypted at rest on laptops, removable devices, and at the data centers we partner with for our technology products and services. EAB requires the secure transmission of personal information to and from our network; we work with clients to discourage transmission that is otherwise not secure. This is accomplished through a combination of secure technologies like SSH File Transfer Protocol (SFTP) for in-transit encryption of bulk file transfers and SSL/TLS encryption in transit for web traffic.

Datacenter controls include the use of SOC-audited data centers with physical controls including multi-factor authentication for access, 24x7 monitoring, video monitoring, and locked cages. We also have active detection (IDS monitoring, log consolidation, alerting) and prevention (IPS, firewall, security zones) programs to protect personal information, and vetted third party providers for centralized audit logging capabilities.

9. Specific Regional & Country Information

+ California

If you are a California resident, please see the California Privacy Notice [here](#).

+ Outside of the United States

EAB.com is operated within the United States. If you are located outside of the United States, any information you provide to us will be transferred to the United States.

10. Contact Us

If you have any questions or concerns about our Privacy Policy or data privacy practices, contact us at privacy@eab.com or write to us at the following address.

EAB Global, Inc.
Attn: General Counsel
2445 M Street, NW
Washington, DC 20037