

# Privacy Policy

Last modified: May 25, 2018

## Introduction

NATIONAL PERSONNEL ASSOCIATES COOPERATIVE, INC., a Michigan nonprofit corporation d/b/a NPWorldwide (“NPWorldwide,” “Company” ”Our”, “We” or “Us”) respects your privacy and are committed to protecting it through our compliance with this policy.

This Policy applies to all data collections and other data processing of the Company, in particular to the types of information We may collect from you or that you may provide when you use our websites npaworldwide.com, npaworldwideworks.com, and searchnpaworldwidejobs.com (collectively “Website”), specifically to provide certain employment credentials or to review potential employee credentials for the purpose of finding a job position or, on the other side, finding an employee for a job position (collectively the “Service”). This Policy describes how the Company’s practices for collecting, using, sharing, maintaining, protecting and disclosing information you provide to us, some of which may include “Personal Data” as that term is defined by certain laws. It also describes your choices regarding use, access, and correction of personal information. The use of information collected through our Service shall be limited to the purpose of providing our Company’s Services for which the Company is engaged as set out in the Master Subscription Agreement, Terms of Service, and other agreements in effect from time to time with the customer and this Policy.

This policy applies to information we collect:

- On this Website or during the process of providing the Services.
- In e-mail, 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.
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this Policy.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by the Company or any third party; or
- Any third party, including through any application or content (including advertising) that may link to or be accessible from or on 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, your choice is not to use the Website. This Policy may change from time to time (see *Changes to our Privacy Policy*). Your continued use of the Website after We make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

## **1. Children Under the Age of 18**

The Website is not intended for children under 18 years of age. No one under age 18 may provide any information to or on the Website. We do not knowingly collect information from children under 18. We do not use an application or other mechanism to determine the age of users of the Website. If you are under 18, do not use or provide any information on this Website or on or through any of its features. All information provided to Us will be treated as if it was provided by an adult. If We learn We have collected or received personal information from a child under 18 without verification of parental consent, We will use commercially reasonable efforts to delete that information associated with a minor as soon as practicable. If you believe We might have any information from or about a child under 18, please contact us at the contact information below.

## **2. What Information We Collect About You and How We Collect It**

### 2.1 Definitions

2.1.1 “**Personal Information**” means any information relating to an identified or identifiable natural person (“data subject”) who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

2.1.2 “**Non-Personal Information**” means anonymous usage data, referring/exit pages and URL’s platform types, number of clicks, and other information that when used in isolation is not able to identify a natural person.

2.2 We may collect the following categories of information from and about users of our Website, including:

- Information that you provide by filling in forms on our Website or otherwise uploading information to the Website. This includes information provided at the time of registering to use our Website, subscribing to our service,

posting material or requesting further services. We may also ask you for information when you report a problem with our Website.

- Contact information by which a person may be personally identified, such as name, postal mailing address, e-mail address, telephone number, , or any other identifier by which you may be contacted online or offline, which would constitute Personal Information;
- Records and copies of correspondence (including e-mail addresses) if you contact Us;
- Information that is about you but that individually does not identify you, which would constitute Non-Personal Information; and/or
- Your search queries on the Website.

2.3 We collect this Personal Information from you only as you provide it to us and as is automatically collected by you navigating through the Website.

2.4 We process Personal Information as both and Processor and Controller, depending on the circumstances, as those terms are defined in the Directive and the General Data Privacy Protection Regulation.

For EU users/customers, the Company adheres to the Directive of 1995 and the GDPR from May 25, 2018 regarding the collection, use, and retention of Personal Information from EU member countries and Switzerland. The Company adheres to the requirements of notice, choice, onward transfer, security, data integrity, access, and enforcement.

The Company processes all data provided by its Users with accounts in its European Data Region in the United States of America.

2.5 We will only share your Personal Information with third parties in ways that are described in our customer agreements with those third parties and as set forth in this Policy.

2.6 We may email information regarding updates to the Services or additional service offerings in accordance with the terms of this Policy and/or via the terms conditions of each customer's agreements with Us.

2.7 Other third parties, such as content or third party service providers, may provide content or services through the Service and may need access to your Personal Information to provide their services to you. This may include company's seeking to hire. Customers will be using the Services to host data and information. The Company will not use or disclose your Personal Information, except (i) to the extent necessary to provide the Services to you or as requested by you, or (ii) pursuant to law, as determined by the Company in its sole discretion, or (iii) by a court order, or (iv) as described in Section 4.3.5 of this Privacy Policy. Individual customer or customer

candidate records may at times be viewed or accessed by the Company's authorized employees or agents only for the purpose(s) of (i) providing the Services to customers or customer candidates, (ii) resolving a support issue affecting any of them, (iii) to inspect and resolve a suspected violation of customer agreements with a customer, or (iv) as may be required by law, as determined by the Company in its sole discretion, judicial proceeding, subpoena, legal process or binding court order. The Company also reserves the right to disclose your Personal Information as required by law and when We believe, in Our sole discretion, that disclosure is necessary to protect Our rights and/or comply with a judicial proceeding, subpoena, binding court order, or legal process.

2.8 Personal information may be disclosed or distributed to another parties with which the Company enters, or may enter, into a corporation transaction. If the Company is acquired in a merger, acquisition, or sale of all or substantially all its assets, you will be notified via email, on our Website and/or by a prominent notice on our Service of any change in the uses of your personal information, as well as any choices you may have regarding your personal information. In the unlikely event of a bankruptcy, insolvency or liquidation, the database containing personal information may be treated as an asset of the Company and may be subject to transfer to a third party.

2.9 The Company may disclose Personal Information to companies that assist Us in providing our Services or that partner with Us to provide you their services or content. In this context, any such transfers to third parties are governed by Our vendor agreements with them, which provide standards of care for the protection for Personal Information that are not less stringent than the standards contained in our customer agreements, and in no event, less than a reasonable standard of care. Such third-party companies are authorized to use your personal information only as necessary to provide these services to Us and/or you and for the purposes for which the Personal Information was collected and allowed to by your consent to use. In the case of partners with whom you contract directly, their policies regarding Personal Information will govern your relationship with them as stated in the applicable agreement between you and the partner and We will not be responsible for any actions or omission of these partners.

2.10 You are solely responsible for maintaining the confidentiality and security of your user registration and password. Website visitors may opt-in to receiving advertisement or promotional emails from Us by selecting the opt-in link located in the message body of our electronic communications. Website visitors may also email [gdpr@npaworldwide.com](mailto:gdpr@npaworldwide.com) directly with a request to be removed from such communications. We may also track and analyze information that does not identify you as a person and aggregate usage and volume statistical information from our Website visitors, candidate customers and customers and provide such information in aggregated form to third parties.

2.11 We are a service provider to our customers and have no direct relationship with the customer candidate or any individual whose Personal Information a customer processes. If you are a candidate or individual of one of our customers and would no longer like to be contacted by a person or entity that uses our Service, please contact the customer that you interact with directly

or contact us at [gdpr@npaworldwide.com](mailto:gdpr@npaworldwide.com). If you are a customer and would like to update your account, please contact us at [gdpr@npaworldwide.com](mailto:gdpr@npaworldwide.com).

### **3. Why We Collect Information About You**

3.1 We use the Personal Information collected for you only for the following purposes:

- Provide the Services
- Keep records of user and/or customer activity
- Keep records of customer information
- Respond to a customer's service or support request
- For marketing purposes
- Administer a customer's account(s)

3.2 During a user's registration and later on via the user's use of the Website, you may provide information such as your name, company name, address, telephone, credit card number and other relevant data. This information is used by the Company to identify the specific user and to provide them with support services, mailings, sales and marketing actions, enable the Company to bill, and to meet contractual obligations.

3.3 Most of our Services do not require any form of registration, allowing you to visit the Website without telling Us who you are. However, some services may require you to provide us with Personal Information. In these situations, if you choose to withhold any Personal Information from Us, you may not be able to gain access to certain parts of the Website, for Us to be able to respond to certain inquiries or for you to be able to open or have an account.

3.4 Our Website offers publicly-accessible blogs or community forums. You should be aware that any information you provide in these areas may be published or displayed (hereinafter, "**posted**") on public areas of the Website, or transmitted to other users of the Website or third parties (collectively, "**User Content**"). Your User Content is posted on and transmitted to others at your own risk. Although We may limit access to certain pages, please be aware that no security measures are perfect or impenetrable. Additionally, We cannot control the actions of other users of the Website who may access or with whom you may choose to share your User Content. Therefore, We cannot and do not guarantee that your User Content will not be viewed by unauthorized persons. To request removal of your Personal Information from our blog or community forum, Contact us at [gdpr@npaworldwide.com](mailto:gdpr@npaworldwide.com). In some cases, We may not be able to remove your Personal Information, in which case We will let you know if We are unable to do so and why. Alternatively, if You used a third-party application to post such information, you can remove it, either by logging into the application and removing the information, or by contacting the appropriate third party application.

### **4. How We Use Cookies, Log Files, Social Media Plug-Ins, and other Automatic Data Collection and Tracking Technologies**

4.1 Technologies such as cookies or similar technologies are used by the Company and our partners, affiliates or service providers. These cookies are likely to be analytical/performance cookies or targeting cookies and include, for example, those from advertising networks or providers of external services. These technologies are used to analyze trends, administer the Website, track user movements around the Website, location data, traffic data, resources you access and use on the Website, other communication data, and together demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking).

4.2 The information We collect automatically may include Personal Information, or We may maintain it or associate it with Personal Information we collect in other ways or receive from third parties. We gather certain information automatically and store it in log files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating systems, date/time stamp, clickstream data, and files viewed on Our Website, *e.g.*, HTML pages, graphics, etc.), to analyze trends in the aggregate and administer the Website. We do link these automatically-collected data sets to personal information of you that We may have already stored. This information helps Us improve the Website and deliver a better and more personalized service, including, by enabling Us to:

- Estimate Our audience size and usage patterns;
- Store information about your preferences, allowance Us to customize Our Website according to your individual interest;
- Recognize you when you return to Our Website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** 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.
- **Flash Cookies.** Certain features of Our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from and on Our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies.

For information about managing your privacy and security settings for Flash cookies.

- **Web Beacons.** Pages of our Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an e-mail and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

The following information will help you understand the different types of cookies used:

4.2.1 **Strictly necessary cookies** are required for the operation of the Website. These include, for example, cookies which are necessary for users to create an account or login to secure areas of the Website, and cookies that are required to show error or success messages to users.

4.2.2 **Session cookies** containing encrypted information to allow the system to uniquely identify you while you are logged in. Session cookies exist only during an online session. They disappear from your computer when you close your browser software or turn off your computer. This information allows the Company to process your transactions and requests. Session cookies help us make sure you are who you say you are after you've logged in and are required to use the Company application.

4.2.3 **Persistent cookies** that only the Company can read and use, to identify the fact that you are a Company customer or a visitor, who has registered with the Company, to identify and maintain your preferences such as language, country and last check out or to receive certain types of content. Persistent cookies remain on your computer after you have closed your browser or turned off your computer. They include such information as a unique identifier for your browser. We are especially careful about the security and confidentiality of the information stored in persistent cookies. For example, We do not store account numbers or passwords in persistent cookies. Users or visitors who disable their Web browsers' ability to accept cookies will be unable to use all aspects of our Service.

4.2.4 **Targeting cookies** which store a user's username, the referring user if using the referral network and the referral source to the Website.

4.3.5. The following **third-party cookies** could be used:

- Google Analytics – the Website uses cookies from Google Analytics to track user behaviors and overall trends. This helps us to improve the way the Website works.

- Silverpop – the Website uses cookies from Silverpop to track user behaviors and market to users based on their behaviors.
- Visual Website Optimizer – the Site uses cookies from Visual Website Optimizer to track users’ reactions to A/B tests. A/B tests are the creation of two or more versions of a website or portion thereof to determine which one performs better.
- Marketo - the Website uses cookies from Marketo to improve user experience and shorten contact forms for visitors that have previously visited the Website.

Some content or applications, including advertisements, on the Website are served by third-parties, including advertisers, ad networks and servers, content providers and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use Our Website. The information they collect may be associated with your Personal Information or they may collect information, including Personal Information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties’ tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see *Choices About How We Use and Disclose Your Information*.

**4.4 Opt-Out.** You can visit our Website without giving away your Personal Information. The Company uses Google Analytics and Cookies to improve our service, user experience and analyze how the Website is used. Aside from the approximate location (IP address), the information collected by Google Analytics is most anonymously traffic data including browser information, device information, language. We do not collect additional information, such as your age, gender, interests, bank details or clickstream. The collective information is used to provide an overview of how people are access and using the Website. It is not used for any additional purpose, such as to profiles those who access the Website.

You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly. Many browsers allow a private mode to be activated through which the cookies are always erased after the visit. Depending on each browser, this private mode can have different names. The following is a list of the most common browsers and the different names for “private mode”:



- Internet Explorer 8 and later versions = In Private
- Safari 2 and superior = Private Navigation/Browsing
- Opera 10.5 and later versions = Private Navigation/Browsing
- FireFox 3.5 and later versions = Private Navigation/Browsing
- Google Chrome 10 and later versions = Incognito

4.5 **Social Media (Features) and Widgets.** Our Website includes social media features, such as LinkedIn, Twitter, Facebook, and YouTube. These features may collect your IP address, which page you are visiting Our Website, and may set a cookie to enable the feature to function properly. Social media features are either hosted by a third party or hosted directly on Our Website. Your interactions with these features are governed by the privacy statement of the company providing it.

## 5. **Choices About How We Use and Disclosure Your Information**

We use information that we collect about you or that you provide to us, including any Personal Information:

- To present our Website and its contents to you.
- To provide you with information, Services that you request from us.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your account, including expiration and renewal notices.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or any products or services we offer or provide though it.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may also use your Personal Information to contact you about our own and third-parties' goods and services that may be of interest to you.

We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your Personal

Information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

## **6. Disclosure of Your Information**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose Personal Information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To contractors, service providers and other third parties we use to support our business.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of the Company's assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by the Company about our Website users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law or legal process, including to respond to any government or regulatory request.
- To enforce or apply our terms of use and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers or others.

## **7. Access to Your Information and Exercising Data Subject Rights**

7.1 You have the right to request access your Personal Information. Upon request, and within 14 calendar days, the Company will provide you with information about whether we hold,

or process on behalf of a third party, any of your Personal Information; the categories of Personal Information concerned; the recipients or categories of recipients to whom Personal Data has been or will be disclosed (in particular recipients in third countries or international organizations); and where possible, the envisaged period for which the Personal Data will be stored, or, if not possible, the criteria used to determine that period. In addition, the Company will take reasonable steps to permit customers/users to correct, amend, or delete their personal information. To request this access, please contact [gdpr@npaworldwide.com](mailto:gdpr@npaworldwide.com). You can also review and change your Personal Information by logging into the Website and visiting your account profile page. We fulfil your request by sending your copy electronically, unless the request expressly specifies a different method.

7.2 The Company may retain your Personal Information for as long as your account is active, as needed to provide you with our Services, to comply with our contractual or other legal obligations, pursuant to applicable data retention and destruction laws, to resolve disputes, and/or to enforce Our agreements.

7.3 If you believe that the Personal Information We have about you is incorrect, you are welcome to contact Us so We can update it and keep your data accurate. Any data that is no longer needed for the purposes specified in the Information relevant “*What Information We Collect About You and How We Collect It*” provisions above, will be deleted. If any point you wish for the Company to delete information about you, you can simply contact us.

7.4 If you choose to delete your User Content from the Website, however, copies of your User Content may remain viewable in cached and archived pages, or might have been copied or stored by other Website users. Proper access and use of information provided on the Website, including User Content, is governed by our terms of use.

7.5 You have the right to request rectification or erasure of Personal Data or restrictions on Processing of Personal Information concerning you or you may object to such Processing.

7.6 You have the right to obtain without undue delay the rectification of inaccurate Personal Information. Taking into account the purposes of the processing, you have the right to have incomplete Personal Information completed, including by means of providing supplementary information by way of statement or otherwise.

7.7 To exercise any of your data subject rights, including, but not necessarily limited to your right of access, rectification, transfer, portability, restrict processing, erasure or right to object to processing, contact us at [gdpr@npaworldwide.com](mailto:gdpr@npaworldwide.com).

## **8. Access to Personal Information Controlled by Our Customers**

8.1 You have the right to request access your Personal Information. In most cases, the Company has no direct relationship with the individuals whose Personal Information it processes. We recommend that an individual that an individual who seeks access, or who seeks to correct, amend, or delete personal information should direct that inquiry to the Company's customer (the data controller) who controls the data at issue. If requested to remove data by our customer, We will respond within 30 days. Individuals may also submit such inquiries or requests directly to the Company at no cost to them by contacting npa@npaworldwide.com.

## **9. Data Retention by Us**

We will retain Personal Information we process on behalf of our customers for as long as needed to provide Services to our customer and as required under customer agreements. We will also retain this Personal Information as necessary to comply with our legal and/or contractual obligations, resolve disputes, and enforce our agreements. When the purpose for which the Company is processing, the personal information is fulfilled, expires or is terminated, the Company will, upon request, provide our customers with a copy of their personal information stored by Us and the Company will then either delete or anonymize/de-identify any remaining personal information in accordance with our customer agreements.

## **10. Data Security**

We have implemented reasonably and appropriate security measures designed to secure your Personal Information and protect it from accidental loss, misuse, unauthorized access, use, alteration and disclosure.

All data collected by the Company through the Website will be stored in secure hosting facilities provided by QTS Data Center, 300 Satellite Blvd NW, Suwanee, Georgia, 30024, though as the Company's customers access data for use and become controllers, the data may also be stored as those customer/controllers sit fit. The Company has a data processing agreement in place with its provider ensuring compliance with the the GDPR. All hosting is performed in accordance with the highest security regulations. All transfers of data internally in the EEA are done in accordance with that data processing agreement and data transfers externally from the EEA to the US are done in accordance with the principals of the EU-US Privacy Shield.

The safety and security of your information also depends on you. Where We have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website like message boards. The information you share in public areas may be viewed by any user of the Website.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

If you are visiting the Website from outside the United States, please be aware that you are sending information (including Personal Information) to the United States where our servers are located. That information may then be transferred within the United States or back out of the United States to other countries outside your country of residence, depending on the type of information and how it is stored by Us. These countries (including the United States) may not necessarily have data protection laws as comprehensive or protective as those in your country of residence; however, our collection, storage and use of your Personal Information will at all times continue to be governed by this Privacy Policy.

#### **11. Your California Privacy Rights**

California Civil Code Section § 1798.83 permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an e-mail to npa@npaworldwide.com or write us at: 1680 Viewpond Drive SE, Grand Rapids, MI 49508.

#### **12. 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 by e-mail to the primary e-mail address specified in your account and 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 ensuring we have an up-to-date active and deliverable e-mail address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

#### **13. Contact Information**

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

- Request access to information that the Company has about you
- Correct any information that the Company has about you
- Delete information that the Company has about you

- Or if you have any additional questions about the Company’s collection and storage of data, please contact the Company at:

*NPWorldwide  
1680 Viewpond Drive SE  
Grand Rapids, MI 49508*

or send an email to:

[gdpr@npaworldwide.com](mailto:gdpr@npaworldwide.com)

**The Company’s Data Protection Officer**

The Company has a “Data Protection Officer” who is responsible for matters relating to privacy and data protection. This Data Protection Officer can be reached at the following address:

*Chris Paull  
Data Protection Officer  
cpaull@npaworldwide.com  
NPWorldwide  
1680 Viewpond Drive SE  
Grand Rapids, MI 49508*