

**Parade Technologies**  
**Personal Data Privacy Statement**

Effective Date: January 1, 2020

Parade Technologies, Ltd., and its affiliates (collectively, “Parade Technologies” “we,” “our,” and/or “us”) respect your right to privacy.

This Personal Data Privacy Statement (“Privacy Statement”) outlines how we collect, use, retain and share personal data we collect from individuals or that individuals provide to us when using our website (“Website”), or use any of applications and related services made available by us from time to time (collectively, our “Services”). By using our Services, you agree to the collection, use, disclosure, and procedures this Privacy Statement describes. If you do not agree with this Privacy Statement and practices, your choice is not to use the Services. We provide Services throughout the world and comply with our obligations under applicable data protection laws (collectively, “Data Protection Legislation”), including the General Data Protection Regulation (EU 2016/679) (“GDPR”) and California Consumer Privacy Act (“CCPA”). Parade Technologies is considered a data controller under the GDPR.

**1. Information We Collect**

We may collect information from or about you and your devices from various sources as described below.

*A. Information You Provide to Us.*

**Communications.** If you contact us directly, by phone or email, we may receive information about you. For example, if you email our Sales or Customer Service teams in relation to our current or potential business relationship with you or your employer (“Customers”), we will receive your name, email address, the contents of a message, any attachments that you may send to us, and any other information you choose to provide.

**Careers.** If you decide to apply for a job with us (“Candidates”), you may submit your contact information and your resume online or via referral. We will collect the information you choose to provide on your resume, such as your contact details, education and employment experience.

**Visits.** If you visit us at our offices (“Visitors”) we may collect the information you provide to us directly. For example, if you leave your business card, we will receive your name, email address, phone number, and any information you chose to relay to our employees during your visit.

*B. Information We Collect When You Use Our Services*

**Device Information.** We receive information about the device and software you use to access our Services, including IP address, web browser type, operating system version, phone carrier and manufacturer, device identifiers, and mobile advertising identifiers.

**Usage Information.** To help us understand how you use our Services and to help us improve them, we automatically receive information about your interactions with our Services, such as the pages or other content you view, and the dates and times of your visits.

**Information from Cookies and Similar Technologies.** We and third-party partners may collect information using cookies, pixel tags, or similar technologies. Our third-party partners, such as analytics and advertising partners, may use these technologies to collect information about your online activities over time and across different services. Cookies are small text files containing a string of alphanumeric characters. We may use both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to our Services.

Please review your web browser's "Help" file to learn the proper way to modify your cookie settings. Please note that if you delete or choose not to accept cookies from the Service, you may not be able to utilize the features of the Service to their fullest potential.

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

**Third Parties.** We may work with third-party providers whom we engage to collect personal data about you in the course of your recruitment and employment, or your business relationship with us or through the website.

**Background Checks.** We work with third party partners to perform background checks on Candidates and receive publicly available information such as criminal history, education and employment records.

## 2. **How We Use the Information We Collect**

We use the information we collect for the following purposes:

- to provide you with the goods or services you or your employer need, including to facilitate transactions and payments;
- to contact you if required in connection with your communication and/or order or to respond to any communications you might send to us;
- to improve our Services;
- to carry out research and analysis of our Customers and Candidates;
- to assess your suitability for a job with us;
- to manage feedback and queries, and handle requests for data access or correction, or the exercise of other rights relating to personal data;
- to find and prevent fraud, and respond to trust and safety issues that may arise;
- to comply with applicable laws and regulatory obligations; comply with legal process and court orders; and respond to requests from public and government authorities; and
- to enforce and defend our legal rights to protect our business operations; and

- for other purposes for which we provide specific notice at the time the information is collected.

### 3. **Lawful Basis For Using Your Information**

Where applicable, we will only collect, use, retain, or share your information where we have a lawful basis to do so under Data Protection Legislation.

For EU residents, we only process your personal data where:

- The processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract. (For example, we process the personal data of our Customers so that we can perform any contract that we may have with them and deliver goods and services. We also process the personal data of Candidates on the basis that they have requested we assess their suitability for a role with us, or process the personal data of our employees in order to administer the employees' account, to develop contractual relationship, to comply with legal obligations, including tax and labor regulations, or to work with third-party providers to provide services to our employees.);
- The processing is necessary for compliance with a legal obligation;
- The processing is necessary for the legitimate interests pursued by us or a third party. (For example, we may process personal data from Customers where it is in our legitimate interest to do so in order to improve our Services. We also hold the personal data of Visitors because it is in our interest to keep a record of your on-site visit with us for health and safety); or
- You consent to the processing for a specific purpose.

### 4. **How We Share the Information We Collect**

We will use and disclose your personal data for the purposes described in "How We Use the Information We Collect". We may share your personal data with our affiliates, in order to fulfil our contract with you, or as necessary to improve our products and Services. We only disclose your personal data to third parties, outside of the Parade Technologies, where we have informed you of these categories of third parties. This may include service providers such as IT systems, payment services, banks and financial institutions, background check services, and professional advisors such as lawyers.

We will disclose your personal data to government bodies or parties in legal proceedings if we believe in good faith that we are required to disclose it in order (a) to comply with any applicable law, a summons, a search warrant, a court or regulatory order, or other statutory requirement; (b) to protect our legal rights, the privacy or safety of Parade Technologies employees, agents, contracts, or other individuals; (c) to protect the safety and security of visitors to the Parade Technology offices; or to protect against fraud or other illegal activity; (d) to enforce our legal rights.

We reserve the right to transfer your personal data to a third party in the event of an acquisition of any part of our business or a merger provided that the third party agrees to adhere to the terms of this Privacy Statement and provided that the third party only uses

your personal data for the purposes that you provided it to us. You will be notified in the event of any such transfer and you will be afforded an opportunity to opt-out.

If you share your information on any other website through an external link it will be processed pursuant to the privacy policy of the operator of that website.

#### *International Transfers*

In providing services to you, your data may be processed by our entities, or third party partners in countries other than your country of residence. By providing us with your information you consent to any such transfer, storage or use.

To the extent that Parade Technologies transfers the personal data of EU residents to recipients which are located outside the European Union, the UK or the European Economic Area, we will provide an adequate level of protection, including appropriate technical and organizational security measures and through the implementation of appropriate contractual measures to secure such transfer, in compliance with applicable Data Protection Legislation. Parade Technologies uses standard contractual clauses in the form approved by the European Commission.

### **5. How Long Do We Keep Your Information**

We will retain your personal data for as long as needed or permitted in light of the purposes for which it was obtained. The criteria used to determine our retention periods include: (a) the length of time we have an ongoing relationship with our Customers and provide services, (b) whether there is a legal obligation to which we are subject, and (c) whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

### **6. Security**

We take reasonable steps to protect the privacy of the information we hold about you from misuse, unauthorized access, loss, modification or disclosure. We maintain physical, technical and administrative safeguards to protect your personal data. We update and test our security technology on an ongoing basis. We restrict access to your personal data to those employees who need to know that information to provide benefits or services to you. In addition, our employees understand the importance of confidentiality and maintaining the privacy and security of your information.

### **7. Data Subject Rights for EU residents**

This Privacy Statement is intended to provide you with information about what personal data Parade Technologies collects about you and how it is used.

Please inform us of any changes in your personal data, and in accordance with our obligations under the GDPR, we will update or delete your personal data accordingly.

If you are an EU resident, you have certain rights in relation to your personal data (as defined by the GDPR) including:

- the right to find out what personal data we hold on you and request access to it;
- the right to have your personal data updated, rectified, amended or removed from our database;

- the right to object to the use of your personal data or restrict access to it;
- the right to request that we send your personal data to a third party; and
- the right to withdraw your consent to the processing of your personal data, if consent was the legal basis we relied upon for processing.

Please note that some of these rights may be limited under local law.

To exercise your data subject rights, EU residents, may contact us at: [legal@paradetech.com](mailto:legal@paradetech.com). You may also lodge a complaint with the relevant supervisory authority in your jurisdiction.

## 8. Information for California Residents

### *A. Rights and Choices*

If you are a California resident, California law permits you to request the:

- Categories of Personal Information (as defined by applicable California law) collected, sold or disclosed by us;
- Purposes for which categories of Personal Information collected by us are used;
- Sources of information from which we collect Personal Information; and
- Specific pieces of Personal Information we have collected about you.

In addition, if you are a California resident you may:

- Opt-out of the sale or disclosure of your Personal Information, in some circumstances;
- Opt-out of receiving marketing communications from us; however, you may still receive administrative communications regarding the Services;
- Opt-in to certain financial incentive programs we may offer related to the collection, sale, or deletion of your Personal Information; and
- Request deletion of your Personal Information by us and our service providers, in some circumstances.

### *B. California Consumer Requests*

To make a request related to you California privacy rights, please email us at [legal@paradetech.com](mailto:legal@paradetech.com), or write to us at the following address:

ATTN: Legal Department, California Privacy Rights  
Parade Technologies, Ltd.  
c/o Parade Technologies, Inc.  
2720 Orchard Parkway,  
San Jose, CA 95134

Please be aware that we do not accept or process requests through other means (e.g., via fax, social media, other mailing addresses or email addresses).

9. **Children**

Our Services are not directed to children, and we do not knowingly collect personal information from children under the age of 16. If you learn that a child has provided us with personal information, then you may contact us as indicated below in Section 11.

10. **Do Not Track**

Parade Technologies does not currently take steps to respond to browsers' "Do Not Track" signals as no uniform standard to respond to such signals has been developed at this time.

11. **Changes to our Privacy Statement**

We may update our Privacy Statement from time to time. Any changes to this Privacy Statement will be posted on our Website so you are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If at any time we decide to use personal data in a manner materially different from that stated in this Privacy Statement, or otherwise disclosed to you at the time it was collected, we will inform you through our Website, and you will have a choice as to whether or not we use your information in the new manner. You should periodically review our current Privacy Statement to stay informed of our personal data practices.

12. **Contact Us**

If you have any questions, concerns or complaints regarding this Privacy Statement, please contact Parade Technologies at [legal@paradetech.com](mailto:legal@paradetech.com).