

GENERAL PRIVACY POLICY

Last Updated on: March 22nd, 2023

Harnham Corporation (together with its relevant subsidiaries, associates, and affiliated companies, “Harnham”, “Company”, “we”, “us” or “our”) respects your right to privacy. This General Privacy Policy (“Privacy Policy”) will provide you with information regarding how Harnham collects, uses, and discloses information about you, including the choices we offer with respect to that information.

It is the Company’s policy to comply with all applicable consumer privacy and data protection laws, including the choices we offer with respect to your personal information, as defined by applicable laws. This commitment reflects the value we place on earning and keeping the trust of our customers, business partners, and others who disclose their personal information with us.

This Privacy Policy applies to the Company’s website (the “Website”), located at www.Harnham.com. It also applies to personal information we may otherwise collect: (i) through our products and services; (ii) when you interact with us by means other than the Website, for example, in person or by telephone; (iii) from our distributors, suppliers, vendors, and other business partners (collectively “Business Partners”); and (iv) from your company or employer. We encourage you to read this Privacy Policy in full before using the Website or any other online service that posts a link to this Privacy Policy, opening our e-mails or otherwise submitting personal information to us (collectively, the “Service” or our “Services”). For certain Services, there may be additional notices about information practices and choices. Please read those additional privacy disclosures to understand how they apply to you.

By visiting or otherwise using the Service, you agree to this Privacy Policy.

To see and print our full Privacy Policy, click [here](#) [Link to printable version]. Our website has an accessibility tool integrated into the site and pages. More information on this service can be found at this link: www.harnham.com/accessibility. If you are visually impaired, and wish to view this Privacy Policy using a screen reader or setup your device to make this page more accessible, the National Federation for the Blind recommends the KNFB Reader App (<https://nfb.org/programs-services/knfb-reader>) and the UK Royal National Institute for the Blind also has information for setting up and optimizing Microsoft Windows and Apple Mac OS operating system tools: <https://www.rnib.org.uk/living-with-sight-loss/assistive-aids-and-technology/tech-support-and-information/computers/computer-accessibility/>.

I. INFORMATION WE COLLECT

To the extent required by applicable law, whenever the Company collects personal information, we will:

- provide timely and appropriate notice to you about our data practices through this Privacy Policy;
- collect your personal information only for specified and legitimate purposes. The information we collect will be relevant, adequate and not excessive for the purposes for which it is collected;
- process your personal information in a manner consistent with the purposes for which it was originally collected or to which you have subsequently consented; and
- not use your personal information for direct marketing purposes without giving you an opportunity to opt-out.

Harnham, and/or its Service Providers (defined below), may collect information that you provide directly to Harnham and/or its Service Providers via the Service. For example, Harnham collects information when you use or register for the Service, apply for a position for which we are recruiting on behalf of a Client

("Client(s)") subscribe to notifications, contact us via the Contact Us form, participate in promotional activities, or communicate or transact through the Service. Harnham may also collect information about you from our Clients or your current or former employers to enable us to provide services to you or Harnham's Clients. In addition, when you interact with Third-Party Services (defined below), you may be able to provide information to those third parties. For more information on Third-Party Services' data collection and practices please refer to the [Third-Party Content, Third-Party Services, Social Features, Advertising and Analytics \[Link\]](#) section. For more information on Service Provider data collection practices please refer to the [Information We Disclose to Third Parties \[Link\]](#) section.

Information Harnham, its Service Providers and/or Third-Party Services may collect includes personal information you provide us, which may include: (i) contact information, such as your name, company name, job title, address, e-mail address, and phone number; (ii) information about your education and work history (iii) additional information about how you use our products or services; (iv) comments, questions, requests, and other communications between you and Harnham; (v) information about your personal characteristics and traits from employment references; and (vi) information about your preferences, such as your preferred methods of communication and the types of products and services in which you are interested.

II. INFORMATION COLLECTED AUTOMATICALLY

Harnham, its Service Providers, and/or Third-Party Services may also automatically collect certain information about you when you access or use the Service, including as follows:

Device and Browser Information:

The Company may collect technical information about your device, such as device type, browser type, IP address, operating system, and device identifier. The Company collects this information automatically from your device and web browser through cookies and similar technologies.

Information About How You Interact with Us:

The Company may collect technical data about your usage of the Website and how you interact with our digital advertisements and promotions, such as content viewed or downloaded, features used, links clicked, Company promotional emails opened, and dates and times of interactions. The Company collects this information using cookies and similar technologies.

Location Information:

The Company may collect location information from your device and imprecise location information derived from, for example, your IP address or postal code.

For more information on Third-Party Services' data collection and practices please refer to the [Third-Party Content, Third-Party Services, Social Features, Advertising and Analytics \[Link\]](#) section. For more information on Service Provider data collection practices please refer to the [Information We Disclose with Third Parties \[Link\]](#) section. For information on choices some of these third parties may offer you regarding automated data collection, please refer to the [Choices: Tracking and Communications \[Link\]](#) section.

The methods we use to automatically collect your information ("Tracking Technologies") include:

Cookies

A cookie is a small text file that is stored on a user's device, which may be session ID cookies or tracking cookies. Session cookies make it easier for you to navigate the Service and expire when you close your browser. Tracking cookies remain longer and help in understanding how you use the Service and enhance your user experience. Cookies may remain on your hard drive for an extended period. If you use your browser's method of blocking or removing cookies, some but not all types of cookies may be deleted and/or blocked, and as a result, some features and functionalities of the Service may not work. For information on how to do this on the browser of your mobile phone or tablet you will need to refer to your device manual. Please note that you will

not be able to opt out of receiving certain cookies that are strictly necessary for the delivery of a service requested by you.

The Website uses “session cookies.” A session cookie does not identify you personally and expires after you close your browser. The Website also uses “persistent cookies.” These cookies do not expire when you close your browser. Persistent cookies stay on your computer until you delete them or they expire. By assigning your computer a unique identifier, we are able to create a database of your previous choices and preferences which can be provided by us automatically, saving you time and effort on future visits.

Web Beacons (“Tracking Pixels”)

Web beacons are small graphic images, also known as “Internet tags” or “clear gifs,” embedded in web pages and e-mail messages. Web beacons may be used, without limitation, to count the number of visitors to the Service, to monitor how users navigate the Service, and to count content views.

Embedded Scripts

An embedded script is programming code designed to collect information about your interactions with the Service. It is temporarily downloaded onto your computer from Harnham’s web server, or from a third party with which Harnham works and is active only while you are connected to the Service and deleted or deactivated thereafter.

Device Recognition Technologies

Technologies, including application of statistical probability to data sets, as well as linking a common unique identifier to different device use (e.g., Facebook ID), which attempt to recognize or make assumptions about users and devices (e.g., that a user of multiple devices is the same user or household) (“Cross-device Data”).

Device and Activity Monitoring and Session Replay

Technologies that monitor, and may record, certain of your interactions with the Service, and/or collect and analyze information from your device, such as, without limitation, your operating system, plug-ins, system fonts, and other data, for purposes such as identification, security, fraud prevention, troubleshooting, tracking and/or improving the Services and customizing or optimizing your experience on the Services. This may also include technologies that monitor and record usage sessions to help us better understand, track, and improve the usage of our Services.

Information from Clients, Business Partners, and Other Third Parties

The Company collects personal information through our Clients and Business Partners. This information may include contact information, such as name, company name, job title, address, e-mail address, and phone number. The Company may also obtain personal information from other third-party sources, including employment references and publicly and commercially available sources. We may combine the information we receive from our Clients, Business Partners, and other third-party sources with information that we collect from you or your device, as described above.

Some information about your use of the Service and certain other online services may be collected using Tracking Technologies across time and services and used by Harnham and third parties for purposes such as to associate different devices you use and deliver relevant ads and/or other content to you on the Service and certain their online services. Please refer to the [Choices: Tracking and Communications \[Link\]](#) section for more information regarding certain choices regarding these activities.

You have choices about the personal information you provide the Company. You may choose not to provide information that we request, but if you do so, we may not be able to provide you a relevant product or service or a particular feature of the Website.

III. INFORMATION WE COLLECT FROM OTHER SOURCES

We may also obtain information about you from other sources, including Service Providers and Third-Party Services. We are not responsible nor liable for the accuracy of the information provided to us by third parties or for third-party policies or practices.

IV. HOW WE USE YOUR PERSONAL INFORMATION

Harnham may use your personal information for any purpose not inconsistent with our statements under this Privacy Policy, or otherwise made by us in writing at the point of collection, and not prohibited by applicable law, including without limitation, to:

- ***DEVELOP AND MANAGE OUR RELATIONSHIPS WITH YOU AND OUR CLIENTS***

This may include: (i) delivering services or carrying out transactions that you or our Clients have requested; (ii) providing information about the Company's products, services, transactions, and advertisements, that may be of interest to you; (iii) providing you and our Clients a more consistent experience in interacting with the Company, including by learning more about you and how you use and interact with the Website, products, and services; and (iv) planning, managing, and performing under our contractual relationships with our Clients.

- ***COMMUNICATE WITH YOU OR OUR CLIENTS***

This may include: (i) informing you of career opportunities, the Company's products, services, and promotional activities that may be of interest to you or our Clients; (ii) providing information about relevant positions, Company products, services, and transactions, including, for example, technical data, information regarding your application status, interviews, and other details relevant to the recruitment process, or information about product or service improvements; (iii) responding to questions or inquiries that you make, including customer service requests; and (iv) inviting you to participate in, or informing you of the results of, customer satisfaction or market research surveys.

- ***PROVIDE AND IMPROVE OUR WEBSITE, PRODUCTS, AND SERVICES***

This may include: (i) customizing them to your preferences or interests, making them more compatible with your technology, or otherwise making them easier to use; (ii) maintaining the security of and otherwise protecting our Services; and (iii) developing new Company Websites, products, and services.

- ***ADDRESS LEGAL ISSUES***

This may include: (i) complying with our obligations to retain certain business records for minimum retention periods; (ii) establishing, exercising, or defending legal claims; (iii) complying with laws, regulations, court orders, or other legal process; (iv) detecting, preventing, and responding to fraud, intellectual property infringement, violation of our contracts or agreements, violations of law, or other misuse of the Website, products or services; and (v) protecting the Company's rights or property, or yours or others' health, safety, welfare, rights, or property.

To the extent permitted by law, Company may anonymize or aggregate any of the information we collect and use it for any purpose, including for research and product-development purposes. We will do our best to ensure the information will not identify you individually, but we do not make assurances that such information is not capable of re-identification.

V. INFORMATION WE DISCLOSE TO THIRD PARTIES

Generally, we may disclose information about you for any purposes not inconsistent with our statements under this Privacy Policy, or otherwise made by us in writing at the point of collection, and not prohibited by applicable law, including, without limitation, as described below.

- We may disclose your personal information to other Company entities and our agents, vendors, consultants, and other service providers (“Service Providers”). The Company may also disclose your personal information to Service Providers we hire to perform support services for us and to help us use your personal information as described above.
- The Company may disclose your personal information with third parties who partner with us to provide products and services to our Clients, such as background check and drug and alcohol screening vendors.
- The Company may disclose your personal information to other third parties when we have a good faith belief that disclosure is necessary: (i) to comply with a law, regulation, court order, or other legal process; (ii) to detect, prevent, and respond to fraud, intellectual property infringement, violation of our contracts or agreements, violation of law, or other misuse of the Website, products or Services; (iii) to protect the Company’s rights or property or yours or others’ health, safety, welfare, rights, or property; (iv) if the Company believes your actions are inconsistent with our user agreements, applicable terms or policies; or (v) under similar circumstances. If such an event occurs, we will take appropriate steps to protect your personal information.
- The Company may disclose your personal information to send you marketing communications, however, Harnham will not disclose your personal information to third parties for their own direct marketing purposes except in connection with corporate transactions, as set forth in the next bullet, absent your consent (which may be by means of third-party interaction described in the last bullet point).
- The Company may disclose your personal information to third parties in connection with the sale, purchase, merger, reorganization, liquidation, or dissolution of the Company, or under similar circumstances. If such an event occurs, we will take appropriate steps to protect your personal information.
- The Company may disclose your information with your permission or at your request. As more fully described in the [Third-Party Content, Third-Party Services, Social Features, Advertising and Analytics](#) [\[Link\]](#) section, your activities on the Service may, by their nature, result in the sharing of your information with third parties and by engaging in these activities you consent to that and further sharing and disclosure to third parties. Such third-party data receipt and collection is subject to the privacy and business practices of that third party, not Harnham.

The Company may disclose anonymized or aggregated information internally and to third parties for any purpose, to the extent permitted by law. We will do our best to ensure the information will not identify you individually, but we do not make assurances that such information is not capable of re-identification.

VI. THIRD-PARTY CONTENT, THIRD-PARTY SERVICES, SOCIAL FEATURES, ADVERTISING AND ANALYTICS

The Services may contain links to websites or mobile apps that are not operated by the Company and plugins from social media platforms and other third parties. Some examples of links to a third-party website include those websites operated by our Business Partners, suppliers, advertisers, sponsors, licensors, and other third parties. Examples of social media plugins are the option to “Share” the Website through your email, Twitter, LinkedIn, Tiktok, and Instagram (“Social Features”). The inclusion of these

Social Features on the Service does not imply any endorsement of the activities or content of the related websites, apps, or social media platforms, nor any association with their operators. To learn about the information collected by these third-party websites, apps, and plugins, please visit their privacy policies. We encourage you to review the privacy policies for the websites, apps, and social media platforms you visit before using them or providing personal information.

If you use Social Features, and potentially other Third-Party Services, information you post or provide access to may be publicly displayed on the Service or by the Third-Party Service that you use. Similarly, if you post information on a Third-Party Service that references Harnham (e.g., by using a hashtag associated with Harnham in a tweet or status update), your post may be used on or in connection with the Service or otherwise by Harnham. Also, both Harnham and the third party may have access to certain information about you and your use of the Service and any Third-Party Service.

Harnham may engage and work with Service Providers and other third parties to serve advertisements on the Service and/or on other online services. Some of these ads may be tailored to your interest based on your browsing of the Service and elsewhere on the Internet, which may include use of precise location and/or Cross-device Data, sometimes referred to as “interest-based advertising” and “online behavioral advertising” (“Interest-based Advertising”), which may include sending you an ad on another online service after you have left the Service (i.e., “retargeting”).

Harnham may use Google Analytics or other Service Providers for analytics services. These analytics services may use cookies and other Tracking Technologies to help Harnham analyze Service users and how they use the Service. Information generated by these analytics services (e.g., your IP address and other usage Information) may be transmitted to and stored by these Service Providers on servers in the U.S. (or elsewhere) and these Service Providers may use this information for purposes such as evaluating your use of the Service, compiling statistic reports on the Service’s activity, and providing other services relating to Service activity and other Internet usage.

Harnham is not responsible for, and makes no representations regarding, the policies or business practices of any third parties, including, without limitation, analytics Service Providers and Third-Party Services associated with the Service, and encourages you to familiarize yourself with and consult their privacy policies and terms of use. Please refer to the [Choices: Tracking and Communications Options \[Link\]](#) section for more on certain choices offered by some third parties regarding their data collection and use, including regarding Interest-based Advertising and analytics.

VII. CHOICES: TRACKING AND COMMUNICATIONS OPTIONS

A. Tracking Technologies Generally

Regular cookies may generally be disabled or removed by tools available as part of most commercial browsers, and in some instances blocked in the future by selecting certain settings. Browsers offer different functionalities and options, so you may need to set them separately. Please be aware that if you disable or remove these technologies, some parts of the Service may not work and that when you revisit the Service your ability to limit browser-based Tracking Technologies is subject to your browser settings and limitations.

Your browser settings may allow you to automatically transmit a “Do Not Track” signal to online services you visit. Note, however, there is no consensus among industry participants as to what “Do Not Track” means in this context. Harnham currently does not alter its practices when Harnham receives a “Do Not Track” signal from a visitor’s browser. To learn more about “Do Not Track,” you can visit <http://www.allaboutdnt.com>, but Harnham is not responsible for the completeness or accuracy of this third-party information.

B. Analytics and Advertising Tracking Technologies

As described above, we use your personal information to provide you with targeted advertisements or marketing communications we believe may be of interest to you. You may choose whether to receive some Interest-based Advertising by submitting opt-outs. Some of the advertisers and Service Providers that perform advertising-related services for us and third parties may participate in the Digital Advertising Alliance's ("DAA") Self-Regulatory Program for Online Behavioral Advertising. To learn more about how you can exercise certain choices regarding Interest-based Advertising, including use of Cross-device Data for serving ads, visit <http://www.aboutads.info/choices/>. Some of these companies may also be members of the Network Advertising Initiative's ("NAI"). To learn more about the NAI and your opt-out options for their members, please refer to their educational page at <https://www.networkadvertising.org/understanding-online-advertising/how-does-it-work/> and <http://www.networkadvertising.org/choices/>. Please be aware that even if you are able to opt out of certain kinds of Interest-based Advertising, you may continue to receive other types of ads. Opting out only means that those selected members should no longer deliver certain Interest-based Advertising to you but does not mean you will no longer receive any targeted content and/or ads (e.g., from other ad networks). Also, if your browsers are configured to reject cookies when you visit these opt-out webpages, or you subsequently erase your cookies, use a different device or web browser or use a non-browser-based method of access (e.g., mobile app), your NAI / DAA browser-based opt-out may not, or may no longer, be effective. Harnham supports the ad industry's [Self-regulatory Principles for Online Behavioral Advertising](https://www.iab.com/wp-content/uploads/2015/05/ven-principles-07-01-09.pdf) [Link to <https://www.iab.com/wp-content/uploads/2015/05/ven-principles-07-01-09.pdf>] and expects that ad networks Harnham directly engages to serve you Interest-based Advertising will do so as well, though Harnham cannot guarantee their compliance.

We may also use Google Ad Services. To learn more about the data Google collects and how your data is used by it and to opt out of certain Google browser Interest-Based Advertising, please visit [here](https://myadcenter.google.com/?sasb=true) [Link to <https://myadcenter.google.com/?sasb=true>]. You may exercise choices regarding the use of cookies from Google Analytics by going to <https://tools.google.com/dlpage/gaoptout> or downloading the Google Analytics Opt-out Browser Add-on.

Harnham is not responsible for effectiveness of, or compliance with, any third parties' opt-out options or programs or the accuracy of their statements regarding their programs.

C. Communications

You can opt out of receiving certain promotional communications (e-mails) from Harnham at any time by following the instructions provided in e-mails to click on the unsubscribe link. Please note that your opt-out is limited to the e-mail address used and will not affect subsequent subscriptions. If you opt-out of only certain communications, other subscription communications may continue. Even if you opt out of receiving promotional communications, Harnham may, subject to applicable law, continue to send you non-promotional communications, such as those about positions you have applied to, transactions, servicing, or Company's ongoing business relations.

VIII. SECURITY OF YOUR PERSONAL INFORMATION

Harnham maintains reasonable safeguards to protect the confidentiality, security, and integrity of your personal information. Although we use security measures to help protect your personal information against unauthorized disclosure, misuse, or alteration, as is the case with all computer networks linked to the Internet, we cannot guarantee the security of information provided over the Internet and will not be responsible for breaches of security beyond our reasonable control.

IX. RETENTION OF YOUR PERSONAL INFORMATION

How long we keep your personal information will vary and will depend on the purpose and use of the information collected. There are legal requirements that we keep some types of data for specific periods. Otherwise, we will retain it for no longer than is necessary for the purposes for which the data was collected.

X. CHILDREN

The Website is not intended for children under 13 years of age. If we obtain knowledge that we have collected information regarding children under 13, we will remove such data to the extent required by applicable law.

XI. CHANGES TO THIS PRIVACY POLICY

We reserve the right to change this Privacy Policy prospectively effective upon the posting of the revised Privacy Policy. Changes to this Privacy Policy will be posted on this website, along with information on any material changes. The Company reserves the right to update or modify this Privacy Policy at any time and without prior notice. Any modifications will apply only to the personal information we collect after posting the updated Privacy Policy. To the extent any provision of this Privacy Policy is found by a competent tribunal to be invalid or unenforceable, such provision shall be severed to the extent necessary for the remainder to be valid and enforceable.

XII. INTERNATIONAL TRANSFER

Harnham is based in the U.S. and the information Harnham and its Service Providers collect is governed by U.S. law. If you are accessing the Service from outside of the U.S., please be aware that information collected through the Service may be transferred to, processed, stored, and used in the U.S. Data protection laws in the U.S. may be different from those of your country of residence. Under such circumstances, we comply with all applicable global privacy and data protection requirements. All cross-border transfers of your information will comply with the local privacy laws of the jurisdiction from which we are transferring the data or as otherwise applicable, as well as in compliance with the terms of this Privacy Policy. Furthermore, we will provide appropriate safeguards for cross-border transfers in accordance with our legal obligations under applicable data protection laws.

XIII. QUESTIONS ABOUT THIS PRIVACY POLICY

If you have any questions about this Privacy Policy or our use of your personal information, please contact:

Harnham, Inc.
99 Water St 33rd Floor
New York, NY 10038, United States

dataprotection@harnham.com