



# Infinite Talent Acquisition Privacy Notice

The information contained in this document is the property of Infinite Computer Solutions. Except as specifically authorized in writing by Infinite Computer Solutions, the holder of this document shall: (1) keep all information contained herein confidential and shall protect same in whole or in part from disclosure and dissemination to all third parties and, (2) use same for operating and maintenance purposes only.

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This privacy policy will explain how Infinite Talent, Inc. ("Infinite" or "we") uses the personal data we collect from you when you use our Talent Acquisition Suite of Products and related professional services, including Infinite Talent Platform, Infinite Talent Onboarding, Infinite Talent Lead Manager, and related services (the "Services").

### **Topics Covered:**

- Infinite as a Service Provider
- What personal data do we collect?
- What is Infinite's legal basis for process personal data?
- How do we collect personal data?
- How will we use personal data?
- Does Infinite sell personal data collected by our customers?
- How do we store personal data?
- How do we secure the data?
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### **Infinite as a Service Provider**

Infinite customers are organizations such as businesses, non-profit organizations, government agencies, and educational institutions, who use our Services to help them manage their personnel and job applicants. Infinite processes personal data through these Services only according to our customers' instructions pursuant to a contract. In this way, Infinite is a "processor" or a "service provider," while our customers are the "controller" or the "business." If you have questions about personal data you have entered into an Infinite Service or want to exercise any of your rights regarding your personal data, the privacy laws and our customer contract requires that we redirect your inquiry back to that Infinite customer.

To begin this request please contact Infinite's Director of Product at [Ryan.Jackson@infinite.com](mailto:Ryan.Jackson@infinite.com)

### **What data do we collect?**

For Customer users of the Services the data collected may include, but is not limited to:

- first name, last name, address, email address, phone number(s)

Infinite's Services are customizable by its customers, who can configure the Services to collect a variety of personal data from applicants, which may typically include, but is not limited to:

- first name, last name, address, email address, phone number(s), education history, work experience, CV/resume, information about primary country of residence and citizenship, additional countries of interest, country you are applying to and the eligibility to work there, areas and communities of interest;
- depending on the country, disability, ethnicity, gender, race, religion, or other characteristics of protected classifications under California or federal law;
- For transfers or rehires: employee id, job title, department
- Other data, as configured by customer to complete a job applications

Additionally, we collect business contact information for account management purposes related to the use of Services. This includes account registration information (e.g., name and email), profile information (e.g., company name and title).

### **What is Infinite's legal basis for process personal data?**



For individuals that are from the European Economic Area (EEA) or other regions that stipulate a lawful basis for processing personal information (such as under GDPR Article 6), our legal basis for collecting and using their personal information will depend on the nature and circumstances of the processing activity. Where we are the processor for our customers, our legal basis may be fulfilment of a contract, consent, or legitimate interests. Where we are the controller, our legal basis will be consent or legitimate interest where the processing is in our legitimate interests and not overridden by the individual's data protection interests, or fundamental rights and freedoms. These interests are to provide individuals with access to the Services and features of the Services; to send them information they have requested; to ensure the security of our Services by trying to prevent unauthorized or malicious activities; or to enforce compliance with our terms of use, contracts, and other policies.

### **How do we collect personal data?**

Infinite

customers provide Infinite with most of the personal data we collect. We collect data and process data when:

- Customers purchase our Services through a contract and create user accounts to access Services.
- Customers or their personnel or job candidates voluntarily submit information through our Services to complete a job applications, survey, or provide feedback on any of our message boards or via email.
- Use or view our website via browser's cookies.
- Integrations with Customer systems

Infinite may also receive personal data indirectly from our customers who upload and share personal data through the Services.

### **How will we use personal data?**

Infinite collects personal data on behalf of our Customers at their direction so that we can deliver the Services to its customers. Customers utilize the Services to manage their personnel and their job applicants. We encourage individuals to review the privacy policy of any Infinite customer who utilizes the Services for more information. Infinite discloses personal data to our subsidiaries and affiliates for the purpose of providing Services to our customers.

Infinite uses the data we collect to understand how our websites and Services are being used and to make improvements. For example, we may solicit feedback about experience using our Services, and ways that we can improve them. Additionally, we use questions posted or comments on online community to enrich the content or help guide future enhancements to our products and services.

Infinite may use personal information to diagnose technical problems, as well as to prevent, detect, mitigate, and investigate potential security issues, as well as fraudulent or illegal activity.

### **Does Infinite sell personal data collected by our customers?**

Infinite does not use personal data of our customers for any purposes other than to provide services that our customers have contracted us to provide through our Services, to improve our Services, or as required or permitted by law. Infinite does not sell personal data of our customers to third parties for any purpose.

### **How do we store personal data?**

Infinite securely stores personal data in Azure Cloud at the following locations.

US: Azure US East 2 and US Central

EU: Azure EU North and EU West

### **How do we secure the data?**

We take appropriate precautions including organizational, technical, and physical measures to help safeguard against accidental or unlawful destruction, loss, alteration, and unauthorized disclosure of, or access to, the Personal Data we process or use. While we follow generally accepted standards to protect Personal Data, no method of storage or transmission is 100% secure. You are solely responsible for protecting your password, limiting access to your devices and signing out of websites and Services after your sessions.

### **Where does Infinite transfer personal data?**

To facilitate our business practices and delivery of our Services, personal data may be collected, accessed from, transferred to or stored in the United States or in other countries where we operate, including countries outside the EEA. Personal data may be accessed by Infinite personnel providing Services in any country where we have facilities or in which we engage third party service providers (processors or sub-processors), including Ireland, the Netherlands, India, United Kingdom, and United States. In instances where we transfer personal data outside the EEA, we implement appropriate safeguards to ensure an adequate level of data protection, such as use of Standard Contract Clauses as approved by the European Commission, or taking other measures to ensure an adequate level of data protection under EU law.

### **What are personal data protection rights?**

Data subjects in various jurisdictions have data protection rights.

#### EU/UK/Switzerland

Data subjects in the EEA are entitled to the following:

- **The right to access** - They have the right to request copies of their personal data from an Infinite customer.
- **The right to rectification** - They have the right to request that an Infinite customer correct any information they believe is inaccurate. They also have the right to request an Infinite customer to complete information they believe is incomplete.
- **The right to erasure** - They have the right to request that an Infinite customer erase their personal data, under certain conditions.
- **The right to restrict processing** - They have the right to request that an Infinite customer restrict the processing of their personal data, under certain conditions.
- **The right to object to processing** - They have the right to object to an Infinite customer's processing of their personal data, under certain conditions.
- **The right to data portability** - They have the right to request that an Infinite customer transfer the data that we have collected to another organization, or directly to them, under certain conditions.

If you have questions about personal data you have entered into an Infinite Service or want to exercise any of your rights regarding your personal data, the privacy laws and our customer contract requires that we redirect your inquiry back to that Infinite customer. All requests by users to exercise their rights/delete their data will be forwarded to the respective Data Controllers and be dealt with according to the Data Controllers' direction. To begin this request please contact Infinite's Director of Product at : [Ryan.Jackson@infinite.com](mailto:Ryan.Jackson@infinite.com)

## California Residents

California residents have specific rights under California law regarding their personal information, including the right to request that we disclose certain information about our collection and use of their personal information over the past 12 months; the right to request that we delete their personal information that we have collected, subject to certain exceptions; and the right to opt out of the sale of their personal information. We are only required to respond to two such requests per individual each year. Individuals also have the right not to be discriminated against if they exercise any of their rights under California privacy law.

If an individual makes such a request, the Infinite customer has one month to respond under normal circumstances. Infinite will cooperate and assist its customers in the processing of this request at their direction. If an individual asks Infinite directly to exercise one of these rights, Infinite will notify its customer of the receipt of such request and direct them to the Infinite customer.

### **What are cookies?**

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit our websites or use our Services, we may collect information from you automatically through cookies or similar technology.

For further information, visit [allaboutcookies.org](http://allaboutcookies.org).

### **How do we use cookies?**

Infinite uses cookies in a range of ways to improve your experience on our websites or as part of the application services we provide, including:

- Track the logged in users' information (encrypted)
- Maintain state for load balancing and performance
- Track preferences and acknowledgements (e.g. consent to store cookies)

### **What types of cookies do we use?**

There are a number of different types of cookies, however, our websites and services use:

- Functional - Infinite uses these cookies so that we recognize you on our website and remember your previously selected preferences or maintain your logged in identity to our services. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.
- The services only use session cookies
- For more information about cookie usage in our websites see <http://www.infinite.com/privacy-policy> (Website Privacy Policy)

### **How to manage cookies**

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result. However, disabling cookies will prevent the use of the Services.

### **Privacy policies of other websites**

The Infinite Services may contain links to other websites. Our privacy policy applies only to our Services, so if you click on a link to another website, you should read their privacy policy.

### **Changes to our privacy policy**

Infinite keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 6 July 2023.

**How to contact us**

If you have any questions about Infinite's privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

Or write to us at: 2600 Tower Oaks Blvd., Suite 700, Rockville, MD 20852

Email: [Ryan.Jackson@infinite.com](mailto:Ryan.Jackson@infinite.com)

**How to contact the appropriate authority**

Should you wish to report a complaint or if you feel that Infinite has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office Phone: 0303 123 1113 (local) or +44 1625 545 745 (international). You can also learn more by visiting: <https://ico.org.uk/global/contact-us/>.