

Vangst Privacy Policy

Last Updated: May 16, 2019

Vangst's Privacy Policy ("Privacy Policy") explains the information we collect and how we use it to provide our services. It applies to users of www.vangst.com and any web pages, mobile applications and mobile websites operated by Vangst (collectively, the "Site"), including those who are seeking to find temporary or permanent employment through Vangst ("Job Seekers"), those who are looking to hire temporary or permanent employees through Vangst ("Employers"), and any other users of any of the various services that Vangst provides through the Site or any other channels that link to this Privacy Policy (collectively, the "Services"). For purposes of this Privacy Policy, the terms "Vangst," "we," "us," and "our" refer to Vangst. "You" refers to you, as a user of the Services.

1. Information We Collect

How we collect and store information depends on the Services you use and the activities in which you participate. You can use some of the Services without providing any information other than what is automatically collected as described below. Visitors who access and browse the Site without registering are "Site Visitors." In order to utilize some of the Services offered by Vangst, you must register with Vangst. All users who register with Vangst are "Registered Users."

a) Information you provide

All information that you provide to us when registering, posting a job, posting a profile, communicating through the Site, utilizing our mobile applications or that you otherwise provide on the Site or by phone, email, postal mail or otherwise, will be stored by us. You may provide us with information in various ways, including:

1. When registering

When you register directly through Vangst, we will collect and store the information that you provide to us on our online registration forms. This may include your: first and last name, email address, home address, birthday, phone number, photo, social security number and industry-related IDs. If you register for a Service that requires you to pay a fee, Vangst will also collect your payment method details and your billing address,.

2. Otherwise through the Site or by telephone, email, postal mail or chat

Registered Users may provide additional information through other Site features such as our online communication platforms, groups and payment platforms. In some cases, Site Visitors may have the ability to provide us information through the Site, such as contact information. In addition, both Registered Users and Site Visitors may choose to provide information by phone, email, postal mail, or chat.

b) Information provided by others

1. By Site Visitors, Registered Users and others

Vangst also collects information that Site Visitors, Registered Users and others provide about one another. For example, Job Seekers may invite Site Visitors, Registered Users or others to rate and indicate their relationship to the Employers on the Site. In addition, Registered Users may communicate directly with one another through Vangst platforms. **By third parties to verify your information and representations**

In order to promote the safety and integrity of the Site and Service, you authorize Vangst, as provided in the Terms of Use, to utilize third party service providers to check your information on an ongoing basis against a variety of sources, which may include, but are not limited to, national criminal databases, sex offender registries, certain media streams, terrorist watch lists, criminal and fugitive watch lists, fraud watch lists, law enforcement reports, and other data to assist us in verifying the information you provide us (such as your name, address, email address, etc.) and the representations and warranties you make in the Terms of Use and on the Site.

2. By third parties that perform background checks

As provided in the Terms of Use, we may provide some or all Registered Users and Site Visitors with the ability to request from a third-party consumer reporting agency that a background check be run on themselves or on Job Seekers they are considering hiring using information that they and any subject Job Seekers may provide. Any such background checks will be subject to the terms we establish for such checks on the Site pages where they are requested or authorized, the terms of this Privacy Policy, and our Terms of Use. Vangst may receive a copy of, or otherwise have access to, any such background check, unless otherwise specified in this Privacy Policy or the Terms of Use.

3. By other sources

In addition, we may obtain information about you from other sources (e.g., partners, researchers, marketers, etc.), such as demographic data, and other information to enable us to comply with regulatory requirements, ensure the accuracy of data, better understand your likely interests, prevent fraud, etc. We may combine information that we collect from you with information about you from such other sources and use it in accordance with this Privacy Policy.

c) Information you expressly authorize us to collect

We may request permission to collect certain information from or about you. For example, if you use a Vangst mobile application, we may request permission to access information about the contacts listed in your mobile device phone book when you initiate an address book search for friends who have downloaded the application. We may also request permission to access and store your location (e.g., your precise GPS-based functionality on the mobile devices used to access the Site and Services). If you grant your permission, we will access and/or store such information unless you subsequently opt out by adjusting the settings in your device.

d) Automatically collected information

We may automatically collect certain information about the computer or devices (including mobile devices) you use to access the Site and Services as described below.

1. Log files, IP addresses and information about your computer and mobile device

When you visit the Site, Vangst receives the internet protocol ("IP") address of your computer (or the proxy server you use to access the internet), your computer operating system, the type of web browser you are using, and browser language. If you are using a mobile device, Vangst may also receive unique device identifiers and other information about your mobile or other device(s), and mobile operating system. We may correlate this information with other information we have about you. We may also automatically collect information related to the ways in which you interact with the Site and the Services, such as referring and exit pages, URLs, platform type, the number of clicks, domain names, landing pages, pages and content viewed (including ads viewed) and the order of such views, the amount of time spent on particular pages, the date and time you use the Services, error logs, and other similar information.

2. Cookies and other technologies

- 3. A cookie is a tiny data file that resides on your computer, mobile phone, or other device, and allows us to recognize you when you return to the**

Site using the same computer (or mobile device) and web browser. Like most websites, we and our service providers use cookies, and tracking pixels to track Site usage and trends, evaluate the effectiveness of our ads both on and off our Site, customize your experience on the Site and improve the quality of our Services. For example, using these technologies we can determine, among other things, which pages of our Site you visit and which ads you click on. Most browsers automatically accept cookies, but you can modify your browser settings to decline cookies. In some cases, however, doing so may impact your ability to use Vangst. **Digital advertising & analytics**

When you visit our Services, or open one of our emails, we may allow authorized third parties, such as ad servers, ad agencies, ad exchanges, ad technology vendors, and research firms, to place or recognize a unique cookie, pixel, and/or similar technologies on your browser in order to provide you relevant advertisements. These advertisements, known as interest-based advertising, may be targeted to you based on information these authorized third parties know or infer about you and include in the cookies placed on your browser, and/or on information about your Internet browsing activities gathered through your browser.

Vangst adheres to the Digital Advertising Alliance (“DAA”) Self-Regulatory Principles in connection with this interest-based advertising activity. You can visit www.aboutads.info or www.youradchoices.com/AppChoices to learn more about interest-based advertising and how to opt out of this advertising by companies participating in the DAA self-regulatory program. If you delete your cookies, reset your device advertising identifier, or use a different browser or mobile device, you will need to renew your opt-out choice. You may also be able to limit data collection for advertising purposes using tools available on your device. Note that electing to opt out will not stop advertising from appearing in your browser. It may make the ads you see less relevant to your interests. Even if you opt out, advertising providers may continue to collect data for other purposes, including analytics and other operational purposes.

Advertising providers may also collect and use information through our apps about the precise location of your mobile device, in order to provide ads that are more relevant to you. If you do not want advertising providers to collect information through our apps about your device’s precise location, you can turn off location services on your device.

We may also work with third parties that collect data about your use of the Site and Services and other sites or apps over time for non-advertising purposes. Vangst uses third-party services to improve the performance of the Services and for analytics and marketing purposes.

We may also use Google Analytics to measure Site usage and improve our visitor experience. The relevant data is provided to us by Google in the aggregate and allows us to

better understand our Site audience. The Google Analytics features implemented by us allow us (i) to evaluate and generate reports on certain demographic, behavioral, and interest metrics of users collected by Google, and (ii) to create advertising remarketing audiences and campaigns based on such metrics, which may be segmented into aggregated groups. Visitors can opt-out of Google Analytics for Display Advertising and customize Google Display Network ads using the Ads Settings form at <https://www.google.com/settings/ads>.

4. Social media features and widgets

Our Site includes social media features and widgets, such as Facebook "Like" and "Share" buttons. These features may collect your IP address, the URL of the page you are visiting on our Site, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our Site. Your interactions with these features are governed by the privacy policy of the company providing it.

2. How We Use Information

In general, the information we collect is used (1) to improve our Services and enhance your experience with Vangst, (2) to enable us to provide a safer community for all of our Registered Users, and (3) to help us communicate with you. For example, we may use your information to:

- a) register and service your account;
- b) include in Job Seeker and Employer and profiles;
- c) contact you in response to questions and solicit feedback and input from you;
- d) notify you about new features of the Services, special events, or products, services, and special offers, or other information that we believe will be of interest to you;
- e) administer sweepstakes and contests;
- f) enable users to search based on the information the other has made available on the Site, and information others have provided about them;
- g) connect Job Seekers with Employers that appear to meet their needs and preferences;
- h) enable Registered Users to search for, find, interact, connect and share information with other Registered Users they may have an interest in interacting with;
- i) verify information you provide us as well as the representations and warranties you make to us in the Terms of Use or on the Site;
- j) perform analytics and research aimed at improving the accuracy, effectiveness, usability, or popularity of the Services;

- k) generate and review reports and data about our user base and usage patterns, including to improve the content and features of the Services or develop new Services;
- l) otherwise help protect the safety and integrity of the Site and Vangst users; and
- m) personalize promotional messages or content on the Site, via email or other ads on Vangst or third party sites.

We may aggregate and/or de-identify information collected by the Services, or via other means so that the information is not intended to identify you. Our use and disclosure of aggregated and/or de-identified information is not subject to any restrictions under this Privacy Policy, and we may disclose it to others without limitation for any purpose.

3. How We Share Information

In addition to using the information collected by Vangst for the purposes described above, we may also share your information with various third parties, as described below.

A. With All Site Visitors and Registered Users

If you are a Job Seeker or Employer, we share with Site Visitors and Registered Users the information that is included in your profile or job posting, as well as the following registration information: your first name, first initial of your last name, city, state, and (if provided) your profile picture. With certain exceptions, you choose how much detail you want to include in either your job posting or your profile. We may also share on your profile or job posting any Employer reviews you have posted on our Site, and any connections you have with other Vangst members, including the nature of those connections. If you are a Job Seeker and have elected to verify certain information with Vangst or to have a background check performed, we may also disclose that information in addition to your response rate and any payment or payroll preferences you have indicated. If you post information in a Vangst online group forum, that information may be viewed by any Site Visitor or Registered User who accesses the forum. We may display personal testimonials of Registered Users and other endorsements on our Site or in other marketing materials. These testimonials or endorsements may include information such as the Registered User's first name, first initial of last name, town and state. With a Registered User's consent, we may include their full name.

B. With other Registered Users and corporate providers

In addition to the information that is provided to all Registered Users and Site Visitors, reviews and references are made available to certain Registered Users. If you are a Job Seeker, your phone number may be visible to certain Registered Users if you elect to share it in your profile. In addition, your approximate residential location (through Google map

plotting) is made available to certain Registered Users. If you are a Job Seeker or Employer, you will appear in search result listings if you match the search criteria used by a Job Seeker or Employer, as applicable. Similarly, you may appear in emails sent to Job Seeker and Employers in your area.

If you register for our Vangst Gigs mobile application, other Registered Users of that application may search for you by name, email address, or other information. If they do, your name and profile photo will appear in the search results list and the searcher may contact you through the application to request to join your network or invite you to join theirs. No other information on the application will be shared with the Registered User unless you expressly allow them into your network. However, all information you post to the Vangst Gigs application will be available to all members of your network, including your precise GPS location when you post to the application if you have given us permission to access and collect your precise GPS location information.

If we terminate your registration for any reason, we reserve the right to send a notice of your termination to other Registered Users with whom we believe you have corresponded.

C. With vendors/service providers

We also share information with vendors with whom we have a contractual relationship and who perform services for Vangst such as, vendors who provide email, demographic information, or geo-location information services, vendors who perform background checks, vendors who process or accept credit card payments, vendors who run classified advertising businesses, vendors who send SMS messages to Registered Users' mobile phone numbers, vendors who provide services that enable us and other third parties to detect and prevent fraud, in each case to the extent applicable. In certain cases (such as for vendors who help facilitate our online communication services or provide fraud detection and prevention services), the information we share may include the contents of written and audio messages you send through our online communication platforms.

D. As required by law or for reasons of safety

We may disclose your information when we believe in good faith that such disclosure is appropriate in order to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, situations involving potential threats to the health or physical safety of any person, violations of this Privacy Policy, the Terms of Use, or the Backup Care Terms of Use, and/or to protect the rights and property of Vangst, our employees, users, and the public. This may involve the sharing of your information with law enforcement, government agencies, courts, and/or other organizations.

E. With our affiliates

You acknowledge that we may disclose any of the information we've collected about you to any of our affiliates or subsidiaries for the purposes of providing you with the Service soliciting you for potential employment opportunities with those affiliates or subsidiaries, and for other commercial purposes, including those of our affiliates and subsidiaries.

F. With Your Consent

We also may share your information with a third party if you consent to the sharing.

G. Background Checks

Vangst offers various background check services from consumer reporting agencies. If you authorize a background check to be run on you in response to a request by an Employer who is considering hiring you, the results of the check will be shared directly with the Employer. If you are a Registered User who has requested a background check through Vangst, a statement may be included in your profile to confirm that you have completed that check. The service provider who completes the background check may also send the results to you by email or postal mail. You acknowledge that sensitive material may be included in your background check, and that you are responsible for providing us and our service provider (if applicable) with correct information.

H. Business transactions

In the event we go through a business transition such as a merger, acquisition by another company, or sale of all or a portion of our assets including a sale in bankruptcy, your information may be among the assets transferred. You acknowledge and consent that such transfers may occur and are permitted by this Privacy Policy, and that any acquirer of ours or that acquirer's affiliates may continue to process your information as set forth in this Privacy Policy.

2. Your Choices Regarding the Sharing of your Personal Information

You may email Customersuccess@vangst.com to change your account or preferences or to get more information regarding your personal information and how it is shared.

1. Your Communication Choices

By becoming a Registered User, you are consenting to receive certain email communications from us, such as special offers, tips and advice, notifications of new Employers or Job Seekers in your area, customer surveys and administrative notices.

You can also opt out of email messages by following the “unsubscribe” link included in these messages. Please note that despite any indicated email marketing preferences, we may continue to send you administrative emails regarding Vangst, including, for example, notices of updates to our Privacy Policy, notifications of new Job Seekers or Employers in your area, responses to job postings from Job Seekers, and responses to job applications from Employers

2. Changing or Removing your Personal Information and Closing your Account

You can update certain of your information by logging into your account and accessing your account settings. If you would like to remove some of the information you have posted on the Site, such as information you posted in profiles and job postings, you may do so by editing or deleting that item in your My Profile & Setting area. To request removal of other information you have voluntarily posted on our Site, such as information you may have posted in online group forums, contact help@vangst.com. In some cases, we may not be able to reasonably accommodate your request to remove your information, in which case we will let you know if we are unable to do so and why.

If you no longer wish to participate in our Services, you may close your account directly through your account settings. If you close your account, we may delete any or all of your account information without liability. However, we may retain information related to you if we believe it may be necessary to prevent fraud or future abuse, or for legitimate business purposes, such as analysis of aggregated, de-identified information, account recovery, auditing our records, enforcing our rights and obligations under our agreements, or if required by law. Vangst may also retain and use your information if necessary to provide the Services to other Registered Users. Vangst does not control when search engines update their search index or cache, which may contain certain job posts, profiles or other information that have since been removed from Vangst's Site.

3. How We Protect Information

We have implemented appropriate administrative, technical, and physical security measures to protect against the unauthorized access, destruction, or alteration of your information.

Although we take appropriate measures to safeguard against unauthorized disclosures of information, we cannot guarantee that information that we collect will never be disclosed in a manner that is inconsistent with this Privacy Policy.

4. Links to Other Websites

The Site and Services may contain links to third-party websites and services. However, we are not responsible for the privacy practices employed by those web sites or services, nor are we responsible for the information or content they contain. This Privacy Policy applies solely to information collected by us through the Site and Services; thus when you use a link to go from the Site or Services to a third-party web site or service, this policy is no longer in effect and the privacy policy of such third-party site or service will govern.

5. Changes to Our Privacy Policy

Vangst reserves the right to change this Privacy Policy and our Terms of Use at any time. We will notify you about and provide you with choice about material changes to this Privacy Policy or in our practices as required by applicable law. Material changes will go into effect 30 days after we notify. Non-material changes or clarifications will take effect immediately upon posting of the updated policy on our Site. You should periodically check this Privacy Policy for updates.

6. Contact Us

If you have any questions on our Privacy Policy, you can contact us via email at help@vangst.com, or at: **Vangst, Inc. 518 17th Street, Denver, CO 80202**

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