

RISESMART'S PRIVACY POLICY

RiseSmart, Inc. and its affiliates (collectively, "RiseSmart") provides its Service (as defined below) to you through web sites under the control of RiseSmart (including, without limitation, the site located at <http://www.RiseSmart.com>) (collectively, the "Site"), subject to its Terms of Service (located at <http://www.RiseSmart.com/terms-conditions>) (the "TOS") and this Privacy Policy. The "Service" includes (a) the Site, (b) RiseSmart's outplacement and career management services, and other related services (including file management and analytics services), and related technologies, and (c) all software, materials, portals, recommendations, job leads, data, reports, text, images, sounds, video, analytics and other content made available through any of the foregoing (collectively, the "Content").

RiseSmart is the data controller for all information collected and processed through the Service. Any new features added to or augmenting the Service are also subject to the TOS and this Privacy Policy. This Privacy Policy sets forth RiseSmart's policy with respect to personally identifiable data ("Personal Data") and other information that is collected, transmitted and otherwise used in connection with the Service. Anonymous data, which may be collected during your use of the Service, is not included in "Personal Data."

Your Consent

By voluntarily providing RiseSmart with Personal Data or otherwise using the Service, you agree and consent to RiseSmart's collecting, transmitting and using your Personal Data and other information as summarized below in this Privacy Policy and any other notices RiseSmart may provide to you from time to time in relation to the Service. You have the right to revoke this consent and request that the information you have provided to RiseSmart be deleted.

Personal Data Received from You

If you choose to use the Service, RiseSmart may ask you to provide Personal Data directly to RiseSmart. RiseSmart may receive from you:

- your name, current or recent job title, company name, telephone numbers,

address, email address and other identification or contact information;

- your job history and other experience, education and training, other qualifications, employment objectives, compensation expectations, interests, and other career and biographical information;
- information on your milestone progress and status in your career development and job search; and
- information on your customer satisfaction or other feedback about your career development, your job search and the Service.

In addition, when you interact with RiseSmart through the Service, RiseSmart may collect other Personal Data and information from you when you voluntarily provide such information, such as when you contact RiseSmart with inquiries or respond to one of RiseSmart's surveys.

You will be asked to provide your Personal Data through various channels in connection with the Service, including through your activation of your account for the Service, whether in online registration or paper form, your résumé, checklists and questionnaires that you complete for RiseSmart, training and counseling sessions, discussions, exchange of email and other channels. The Service may also collect your Internet Protocol (IP) address.

For your personal web account that you may establish on the Service, RiseSmart may ask you to establish a unique user name, password and reminder question and use this login information to access your account. You agree to protect the secrecy of your user name, password and reminder question information, and if you fail to maintain that secrecy, you will be fully responsible for any resulting use, theft, alteration, misuse, disclosure or other loss related to your Personal Data or other information.

You have the right to request access to the data you choose to provide to RiseSmart. Access requests can be made to user.support@risesmart.com. RiseSmart will respond to such access requests within 30 days.

Personal Data Received from a Company Client

You acknowledge that a company client of RiseSmart may engage RiseSmart to assist

(a) the company client's current and/or former employees, who have been or will be released from the employment of such company client, in their search for employment through the Service ("Outplacement Assistance") or (b) the company client's current employees with career development through the Service ("Career Development Assistance"), ((a) and (b) collectively, "Company Client Engagements"). In connection with Company Client Engagements, RiseSmart receives from the company client a list of persons eligible for the Service. If you are eligible, the company client's list may include your name, current or recent job title, home address, telephone number, email address, department or business unit, and other Personal Data.

RiseSmart processes your information in this way for its legitimate interest in providing you with a service made available to you by your employer or former employer. RiseSmart only uses Personal Data received from company clients to contact eligible participants.

International Transfers of Personal Data

If you or the company client provide Personal Data in connection with the Service, you acknowledge and agree that such Personal Data may be transferred from your or the company client's current location to the offices and servers of RiseSmart and the authorized third parties referred to herein located in the United States or other countries.

Other Information and Use of Cookies

When you interact with RiseSmart through the Service, RiseSmart receives and stores certain personally non-identifiable information. Such information, which is collected passively using various technologies, cannot presently be used to specifically identify you. In addition, the Service may collect other personally non-identifiable information as part of the functionality of the Service (e.g., the collection of responses to questionnaires that do not contain personally identifiable information). RiseSmart may store such information itself or such information may be included in databases owned and maintained by RiseSmart's agents or service providers. The Service may use such information and pool it with other information to track, for example, the total number of visitors to the Site or Service, the number of visitors to each page of the Site or Service and the domain names of RiseSmart's visitors' Internet service providers. It is

important to note that no Personal Data is available or used in this process unless you or a company client voluntarily provide it, as set forth above.

In operating the Service, RiseSmart may use a technology called "cookies." A cookie is a piece of information that the computer that hosts the Service gives to your browser when you access the Service. RiseSmart's cookies help provide additional functionality to the Service and help RiseSmart analyze Service usage more accurately. For instance, the Service may set a cookie on your browser that allows you to access the Service without needing to enter a password more than once during a visit to the Service. In all cases in which RiseSmart use cookies, RiseSmart will not collect Personal Data except with your permission.

RiseSmart may (and may allow third party service providers to) use such cookies or similar technologies to collect information about your browsing activities over time and across different websites following your use of the Service. Our Service currently does not respond to "Do Not Track" (DNT) signals and operates as described in this Privacy Policy whether or not a DNT signal is received. If RiseSmart does so in the future, a description of how RiseSmart will do so will be set forth in this Privacy Policy.

Sharing of Information with Company Clients

If you are using the Service pursuant to a Company Client Engagement for Outplacement Assistance, RiseSmart may make available to the company client progress reports and other information that may identify you and indicate the status of your use of the Service, the scope of your use of the Service, your milestone progress and status in your career development, your customer satisfaction or other feedback relating to the Service, in each case individually or in an aggregated manner (collectively, "Outplacement Progress Data"). From time to time, RiseSmart may make available to you tools to allow you to adjust the Outplacement Progress Data that RiseSmart is permitted to share with the company client. If you are using the Service pursuant to a Company Client Engagement for Career Development Assistance, RiseSmart may make available to the company client progress reports and other information that may identify you and indicate the status of your use of the Service, the scope of your use of the Service, your milestone progress and status in your job search, your customer satisfaction or other feedback relating to the Service, in each

case in an aggregated manner (collectively, “Career Development Progress Data”). From time to time, RiseSmart may make available to you tools to allow you to adjust the Career Development Progress Data that RiseSmart is permitted to share with the company client. If you have any questions or concerns about the Outplacement Progress Data or Career Assistance Progress Data RiseSmart may share with the company client, please contact user.support@risesmart.com (see information below).

Other Uses and Sharing of Your Information

Within the scope of the Service, RiseSmart may collect, transmit and use your Personal Data and other information for the purpose of providing you the Service, including without limitation to determine what particular assistance you want from the Service and, if you are a job seeker, to provide to you job leads, job search training, résumé-writing assistance and/or other assistance. RiseSmart may also use your Personal Data and other information (a) to identify and authenticate you, e.g., for your access to your Service account and your communication with RiseSmart personnel, or (b) internally to escalate or adjust RiseSmart’s Service activity for your account, report Service performance internally to RiseSmart management, conduct internal training and otherwise manage RiseSmart’s business.

In addition, if you provide Personal Data or other information for a certain reason, RiseSmart may use the Personal Data or other information in connection with the reason for which it was provided. For instance, if you contact RiseSmart by e-mail, RiseSmart will use the Personal Data you provide to answer your question or resolve your problem.

RiseSmart may also use and share your Personal Data and other information collected through the Service, as follows:

- RiseSmart may use your Personal Data and other information to help RiseSmart improve the Content and functionality of the Service, better understand RiseSmart’s users and improve the Service.
- As RiseSmart develops its business, RiseSmart might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, Personal Data and other information may be part of the transferred

assets.

- RiseSmart may share your Personal Data and other information with RiseSmart's affiliates for purposes consistent with this Privacy Policy.
- RiseSmart, like many businesses, sometimes engages other companies to perform certain business-related functions, including analytics. When RiseSmart engages another company to perform a function on its behalf, RiseSmart may provide them with your Personal Data and other information to the extent necessary or useful for them to perform their specific function. These service providers include companies that host our servers, provide our customer administration tools, provide communication tools, and provide services to help detect and prevent fraud.
- RiseSmart may disclose your Personal Data and other information if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, (ii) protect and defend the rights or property of RiseSmart, (iii) act in urgent circumstances to protect the personal safety of users of the Service or the public, or (iv) protect against legal liability.

Aggregated Personal Data

In an ongoing effort to better understand and serve the users of the Service, RiseSmart often conducts research on its user demographics, interests, results and behavior based on the Personal Data and other information provided to RiseSmart. This research, and other metrics or analytics about user behavior, results or reviews, may be compiled and analyzed on an aggregate basis, and RiseSmart may share this aggregate data with its affiliates, agents and business partners. This aggregate information does not identify you personally. RiseSmart may also disclose aggregated user statistics in order to describe RiseSmart's services to current and prospective business partners, and to other third parties for other lawful purposes.

Information Management

RiseSmart may receive or enter all of your Personal Data or other information in digital form. RiseSmart may combine all Personal Data and other information from or about

you into a single proprietary database record, and may store it on servers hosted in the United States or in other countries. You have the right to ensure the Personal Data RiseSmart has about you is correct. In pursuit of this accuracy, RiseSmart may prompt and require you to review a summary of your Personal Data and other information in your account, and confirm or correct the information.

RiseSmart's personnel may access your account online, determine needs and action items, and if you are a job seeker post job leads to your account from any office, travel or work location.

RiseSmart takes reasonable steps to protect the Personal Data and other information provided via the Service from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, no Internet or e-mail transmission is ever fully secure or error free. In particular, e-mail or other transmissions sent to or from the Service may not be secure. Therefore, you should take special care in deciding what information you send to RiseSmart via e-mail or any other transmission method.

Links to Other Web Sites

This Privacy Policy applies only to the Service. The Service may contain links to other web sites not operated or controlled by RiseSmart (the "Third Party Sites"). The policies and procedures described here do not apply to the Third Party Sites. The links from the Service do not imply that RiseSmart endorses or has reviewed the Third Party Sites. RiseSmart suggests contacting those sites directly for information on their privacy policies.

Public Information

If you provide any unsolicited personal information to RiseSmart through the Service or through any other means, such as by posting information to public areas of the Service such unsolicited information shall be deemed to be non-confidential. RiseSmart shall be free to reproduce, use, disclose, and distribute such unsolicited information to others without limitation or attribution. Any information posted to a public area may be accessed and saved by anyone in the world with access to the Site.

Children

RiseSmart is not intended for, nor does RiseSmart knowingly collect information from, children under 13.

Changes to this Privacy Policy

The Service and RiseSmart's business may change from time to time. As a result, at times it may be necessary for RiseSmart to make changes to this Privacy Policy. RiseSmart reserves the right to update or modify this Privacy Policy at any time and from time to time without prior notice. Please review this policy periodically, and especially before you provide any Personal Data. This Privacy Policy was last updated on the date indicated below. Your continued use of the Service after any changes or revisions to this Privacy Policy shall indicate your agreement with the terms of such revised Privacy Policy.

Contacting RiseSmart

To keep your Personal Data accurate, current and complete, please contact RiseSmart as specified below. RiseSmart will take reasonable steps to update or correct Personal Data in our possession that you have previously submitted via the Service.

In the event you have issues or questions related to this Privacy Policy or related privacy matters, you may contact RiseSmart's chief privacy officer at the following address:

Privacy Office
RiseSmart Inc.
55 Almaden Boulevard, Suite 800
San Jose, CA 95113
Email: user.support@risesmart.com

Users in the European Economic Area (EEA) and Switzerland have the right to lodge a complaint with the supervisory authority for data protection in their country.

Effective January 18, 2019