



## Privacy Policy

### Introduction

Welcome to Montage Talent. We are committed to protecting your privacy. This Privacy Policy (“Policy”) is effective as of July 17, 2018 and is intended to memorialize our data collection and disclosure practices for our website and service offerings (the “Services”).

The Services offered by Montage are fundamentally a means to connect job candidates (“Candidates”) with recruiters (“Recruiters”) acting on behalf of employers (“Employers”). Candidates, Recruiters and Employers may be collectively referred to in this Policy as “Users.” Montage maintains appropriate technical security and organizational measures to protect information collected via the Services (“Personal Data”). Montage is compliant with the EU-US Privacy Shield framework as well as the Swiss-US Privacy Shield framework as detailed in the final section of this Policy.

### Consent

By using the Services, you consent to this Policy. If you do not accept the terms of this Policy, your only remedy is to discontinue use of the Services. Information gathered through the Services may be transferred, used, and stored in the United States and in foreign jurisdictions in which we, our agents, customers, and other users of the Services are located. If you access the Services, you consent to the transfer, use, and storage of your information in those jurisdictions.

### Collection of Information

Montage may collect Personal Data of Users in connection with the Services. The types of Personal Data collected may include, but is not necessarily limited to name, user name, address, email address, phone number, IP address, use and browser information, knowledge, skills, abilities, resume data, and answers to employment related questions. Montage may also collect non-personal and anonymous information to be used in an aggregate fashion. For example, Montage may collect system-related information to be used for system administration purposes, to help diagnose problems, to monitor traffic patterns, to determine which services are used most frequently and to assess site usage. Montage will not retain data longer than is necessary to fulfill the purposes for which it was collected or as required by applicable law or regulations. In general, data relating to Candidates is established by contract between Montage and the Employer.

The Services may contain links to third party sites. We are not responsible for the privacy policies, practices, or content of sites owned by others that you may link to or that may be linked from the Services. We encourage you to review the privacy policies and terms and conditions of those sites so that you understand how those sites collect, use, and share your information. This Policy applies solely to the information that we collect from our Services.

### Use of Information

Montage collects Candidate Personal Data to provide services to Employers to assist them in evaluating such Candidates for employment. Montage collects Recruiter Personal Data to facilitate the Recruiter’s use of the Services. In general, Montage collects User information to provide the following services:

- Setting up accounts.
- Record keeping.
- Improving products and services.
- Sending information that Montage believes a User may find helpful.
- From time to time, contacting Users for application research purposes. Information collected may be used to customize the Services.

- Providing services to other users of the Services in accordance with the general purposes of the Services.

### **Disclosure of Information**

Montage may disclose Personal Data and aggregate anonymous information to other users of the Services (for example, information of Candidates to Employers) and to companies, agents, contractors, or others engaged to perform functions on Montage's behalf. Montage may also disclose Personal Data and aggregate anonymous information to those businesses, divisions, and units that are affiliated with Montage. If a Montage business line or the entire business, or a substantial portion thereof, is acquired or transferred, whether by merger, consolidation or purchase of a substantial portion of assets, Montage may disclose and transfer Users' Personal Data to the acquiring third party. Montage may also disclose Users' Personal Data to third parties when we believe, in good faith and in our sole discretion, that such disclosure is reasonably necessary to (a) enforce or apply the terms and conditions of the Services; (b) comply with legal or regulatory requirements; (c) protect the rights, property or safety of us, our users or other third parties; or (d) prevent a crime or protect national security. Montage may also disclose aggregate anonymous information to clients, business partners, merchants, advertisers, investors, potential buyers and other third parties if we deem such disclosure, in our discretion, to have sound business reasons or justification.

When a User accesses the Services through any co-branded websites or linked web pages, Personal Data may be disclosed to and become the property of Montage and / or the relevant co-sponsor. In that case, the use of such Personal Data by the co-sponsor company will be subject to the privacy policy of that company, and Montage is not responsible for nor subject to the co-sponsor's policy regarding their use of the Personal Data. Accordingly, Montage encourages Users to review the privacy policies and practices of any relevant co-sponsor before supplying any personal information.

### **Processing of Information**

For Users with accounts located in the European Economic Area, all processing of Personal Data, as of May 25, 2018, is performed in accordance with privacy rights and regulations following the regulations set forth in the General Data Protection Regulation ("GDPR").

### **Cookies; Beacons**

From time to time, Montage may also use "cookies," "web beacons" or similar technology for the convenience of Users and to enhance Users experience using the Services. A cookie is a small text file that is recorded either temporarily or persistently on a hard drive by a web page server and is not used to deliver viruses or other harmful programs to computers. Rather, cookies enable Montage to recognize a User without requiring the User to repeatedly log in when using the Services. Web beacons are graphics designed to collect web log information such as pages viewed or messages opened. By relying on cookies, web beacons, and similar technology, Montage may be able to deliver a more efficient service that is more personalized for each user. Additionally, these technologies may allow Montage to monitor traffic patterns, Services usage, and session information to make the Services more useful.

### **Children**

We do not knowingly or specifically collect personal information from users under 18 years of age. We do not authorize users under 18 years of age to use the Services.

### **Policy Changes**

Montage reserves the right to change this Policy at any time. In particular, Montage may modify this Policy to reflect changes in the way we collect, use, or disclose information, or to reflect changes in privacy laws, regulations, and/or industry standards. We encourage Users to review this Policy when accessing the Services. Continued use of the Services following changes indicates acceptance of the changes.

## **Applicable Law**

This Policy shall be governed by the laws of the State of Wisconsin, USA, without regard to conflicts of law principles, and exclusive jurisdiction and venue for any dispute arising out of this Policy shall be the state courts or federal courts located in Wisconsin unless an alternate venue is provided for under the Privacy Shield Principles.

## **Montage and the EU-U.S. / Swiss-U.S. Privacy Shield**

Montage recognizes that the European Union (“EU”) and Switzerland have established strict protections regarding the handling of Personal Data of EU and Swiss citizens, including requirements to provide adequate protection for EU/Swiss Personal Data transferred outside of the EU and Switzerland, respectively.

Montage complies with both the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the EU/Switzerland to the United States. Montage has certified to the Department of Commerce that it adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement & Liability (collectively, the “Principles”). If there is any conflict between the terms in this Policy and the Privacy Shield Principles, the Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit [www.privacyshield.gov](http://www.privacyshield.gov).

## **Personal Data Collection & Use**

Montage’s participation in the Privacy Shield applies to all personal data that is subject to the Montage Privacy Statement and is received from the EU, European Economic Area, and Switzerland. Montage will comply with the Principles in respect of such personal data.

Montage’s accountability for personal data that it receives under the Privacy Shield and subsequently transfers to a third party is described in the Principles. In particular, Montage remains responsible and liable under the Principle of Accountability for Onward Transfer if third-party agents that it engages to process the personal data on its behalf do so in a manner inconsistent with the Principles, unless Montage proves that it is not responsible for the event giving rise to the damage. Except as otherwise provided herein, Montage discloses Personal Information only to Third Parties who reasonably need to know such data and not for other purposes. Such recipients must agree to abide by confidentiality obligations

## **Data Integrity And Security**

Montage maintains reasonable and appropriate security measures to maintain the accuracy and integrity of Personal Information. Montage has implemented physical and technical safeguards to protect Personal Information from loss, misuse, and unauthorized access, disclosure, alternation, or destruction as set forth in the Montage Information Security and Data Protection Policies.

## **Access Rights**

You may have the right to access the Personal Data that we hold about you and to request that we correct, amend, or delete it if it is inaccurate or processed in violation of the Privacy Shield. Individual Users may review their own Personal Data stored in Montage databases and correct, erase, or block any data that is incorrect, as permitted by applicable law and Montage policies. Upon reasonable request and as required by the Privacy Shield principles, Montage allows individual Users access to their Personal Data, in order to correct or amend such data where inaccurate. In making modifications to their Personal Data, Data Subjects must provide only truthful, complete, and accurate information. To request erasure of Personal Data, individual Users should submit a written request to Montage at the contact information set forth below. In some cases we may charge a reasonable fee for access to such information. Montage will endeavor to respond in a timely manner to all reasonable written requests to view, modify, or deactivate Personal Data.

Montage encourages you to contact us should you have a Privacy Shield-related (or general privacy-related) complaint. In compliance with the Privacy Shield Principles, Montage commits to resolve complaints about our collection or use of your personal information. EU and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact Montage at the address, phone number and/or email address set forth in the “Contact Information” section below.

Montage has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved Privacy Shield complaints concerning data transferred from the EU and Switzerland. Please contact us to be directed to the relevant DPA contacts. As further explained in the Principles, a binding arbitration option will also be made available to you in order to address residual complaints not resolved by any other means. Montage is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC).

### **Renewal and Changes to Policy**

Montage will renew its EU Privacy Shield and Swiss Privacy Shield certifications annually, unless it subsequently determines that it no longer needs such certification or if it employs a different adequacy mechanism. Montage reserves the right to amend this Policy from time to time consistent with Privacy Shield requirements.

### **Contact Information**

To access your information, ask questions about our privacy practices, or to submit a complaint, please contact us at:

Montage Talent, Inc.  
440 Wells Street, Suite 200  
Delafield, WI 53018  
Phone: 262.264.5964  
Email: [privacy@montagetalent.com](mailto:privacy@montagetalent.com)

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