

## SCOUT PRIVACY POLICY

### General Introduction

We are committed to ensuring that we manage your data professionally and in accordance with all applicable data protection laws. We comply with Personal Data Protection Act 2012 of Singapore, (“PDPA”), the Singapore Copyright Act, 2021, the European Data Protection Regulation (EU 2016/679 GDPR – General Data Protection Regulation) and the local laws applicable in Singapore, where we operate. This Policy aims to provide you with transparency about (i) the types of personal data we gather (ii) why we are processing it and how we use such information, (iii) whether we will share it with any third party, (iv) whether it is processed outside the European Economic Entity (EEA), (v) how we will keep it safe and (vi) your rights in relation to your data.

We have prepared this Privacy Policy to explain how we collect, use, protect, and disclose information and data when you use [www.getscout.ai](http://www.getscout.ai) and its affiliated websites, (the “**Sites**”) and any browser plug in, mobile application, application programming interfaces, and other services offered by TechKnowledge Pte Ltd (collectively the “**Services**”). This Privacy Policy also explains your choices for managing your information preferences, including opting out of certain uses of your Personal Information. This Privacy Policy applies to all users of the Sites and Services, whether you are a candidate who is listed in our database (“**Candidate**”) or an HR manager or recruiter looking for prospective hires on behalf of your company (“**Business User**”).

**By accessing our Sites and our services, you consent and agree to be bound by this Policy.** If you do not agree to the terms of this Privacy Policy, please do not use the Sites or our services. Each time you use the Sites or services, the current version of the Policy will apply. Accordingly, when you use the Sites or services, you should check the date of this Policy (which appears at the top) and review any changes since the last version.

### Personal data we collect

We collect the following categories and types of “**Personal Data**” concerning Candidates:

- **Contact Information:** your first and last name, email addresses, phone number and/or mobile phone number;
- **Professional or employment-related information:** work history, job title, skills, years of experience and education information;
- **Demographic information:** billing address, approximate location (at the level of city/metro area only), gender, race, sexual orientation and immigration (visa) status;
- **Photos:** your professional social network picture;
- **Inferences drawn from the categories described above** in order to make predictions concerning your job-related skills, predicted salary range, and potential fit for employer job searches.

Additionally, if you visit our Sites or use our Services, including if you are Business User, we collect the following additional categories of Personal Information:

**Other Identifiers:** IP address; account name, company name, and address;

**Internet or other electronic activity:** your browsing and click history, including the functions you use and searches you perform using the Services; browser agent name and version; web pages you view; links you click; your IP address; the length of time you visit our Sites and or use our Services; and the referring URL, or the webpage that led you to our Sites;

Our payment partners, may collect financial information (including payment card information) directly from you; however, we will not have access to this information.

SCOUT collects the above mentioned data from you, through your interactions with our Sites and services, our partners, and through your access to various professional networking websites, your publicly available data on the world wide web and provides you with the best experiences with our products and services. You provide some of this data directly, such as when you create a SCOUT account, submit a search query to various search engines or recruiters online, share your profiles on various online professional networking platforms, register for a SCOUT event, sign up for SCOUT, or contact us for support. We get some of it by collecting data about your interactions, use, and experience with our products, services and communications.

We rely on a variety of legal reasons and permissions (sometimes called “computational data analysis / legal basis / permitted use / fair use”) to analyse data, process data, including with your consent, a balancing of legitimate interests, necessity to enter into and perform contracts, and compliance with legal obligations, for a variety of purposes described below.

We also obtain data from third parties. We protect data obtained from third parties according to the practices described in this policy, plus any additional restrictions imposed by the source of the data. These third-party sources vary over time and include:

- Data brokers from which we purchase demographic data to supplement the data we collect.
- Services that make user-generated content from their service available to others, such as local business reviews or public social media posts.
- Communication services, including email providers and professional networks, when you give us permission to access your data on such third-party services or networks.
- Service providers that help us determine your device’s location.

- Partners with which we offer co-branded services or engage in joint marketing activities.
- Developers who create experiences through or for Scout products.
- Third parties that deliver experiences through Scout products and services.
- Publicly -available sources, such as open public sector, academic, and commercial data sets and other data sources.

You have choices when it comes to the technology you use and the data you share. When you are asked to provide personal data, you can decline. Many of our products and services require some personal data to operate and provide you with a service. If you choose not to provide data required to operate and provide you with a product or feature, you cannot use that product or feature.

Likewise, where we need to collect personal data by law or to enter into or carry out a contract with you, and you do not provide the data, we will not be able to enter into the contract; or if this relates to an existing product you're using, we may have to suspend or cancel it. We will notify you if this is the case at the time.

Where providing the data is optional, and you choose not to share personal data, features like personalisation that use the data will not work for you.

**The data we collect depends on the context of your interactions with SCOUT, our Sites and services, various professional networking sites and the choices you make (including your privacy settings), the products and features you use, your location, and applicable law.**

### **How we use personal data**

If you are a Candidate, we use your Personal Information for the following purposes:

- **To Provide Candidate Search Services:** We use Personal Information of Candidates to help make great matches between employers and prospective

employees. Specifically, we use Candidate Personal Information to help our business customers engage with job candidates who may be interested in the job opportunities. When our business customers search for employees with certain skills and talents, they can contact Candidates who match their searches, so the Candidates may learn more about the new job opportunities. Those job opportunities may be a better fit for their professional skills and interests or simply more exciting to them.

If you are a Business User or a visitor to our Sites, we use your Personal Information for the following additional purposes:

- **Transactional Purposes:** We use your contact information, other identifiers, and professional and employment information to provide you with the Sites and Services, including to open and maintain a user account for you and provide Services to you, and send you alerts and communicate with you about your registration or account. We use your billing address to determine your tax liability if you make a purchase of the Services through the Sites.
- **Analytical Purposes:** We use your other identifiers, and internet activity and browsing history to analyze, research and better understand how users access and use our Site and Services, both on an aggregated and individualized basis, to maintain, support, and improve our Site and Services, to respond to user preferences, and for research and analytical purposes.
- **Maintenance and Improvement of the Sites and Services:** We use your contact information, other identifiers and internet activity and browsing history to:
  - Handle your customer services requests;
  - Monitor and improve the Sites and Services;
  - Enhance your online experience and to enable us to provide you with an easier and more personalized experience and level of service;

- Help us diagnose technical and service problems and administer our stores, websites and apps.
- **Security and Fraud Prevention:** We use Personal Information to protect the Sites and Services, our Company, and others and to prevent fraud, theft and misconduct.

We will not use your Personal Information we collected for materially different, unrelated, or incompatible purposes other than the purposes indicated above without providing you notice.

For these purposes, we combine data we collect from different contexts (for example, from your profile uploaded on professional network portals and your profile given to registered recruiting agencies). SCOUT Store uses this information to make personalised recommendations. However, we have built in technological and procedural safeguards designed to prevent certain data combinations where required by law. For example, where required by law, we store data we collect from you when you are unauthenticated (not signed in) separately from any account information that directly identifies you, such as your name, email address, or phone number. Our processing of personal data for these purposes includes both automated and manual (human) methods of processing. Our automated methods often are related to and supported by our manual methods. For example, our automated methods include artificial intelligence (AI), which we think of as a set of technologies that enable computers to perceive, learn, reason, and assist in decision-making to solve problems in ways that are similar to what people do. To build, train, and improve the accuracy of our automated methods of processing (including AI), we manually review some of the predictions and inferences produced by the automated methods against the underlying data from which the predictions and inferences were made. This manual review may be conducted by SCOUT employees or vendors who are working on SCOUT's behalf. When we process personal data about you, we do so with your consent and/or as required to provide the products you use, operate our business,

meet our contractual and legal obligations, protect the security of our systems and our customers, or fulfil other legitimate interests of SCOUT as described in this policy.

## **How We Share Personal Information**

### Service Providers

We share Personal Information with our authorized service providers that perform certain services on our behalf (“**Service Providers**”). For example, we use a payment processor to process payments. We may contract with other Service Providers to provide certain services, such as hosting and maintenance of our databases and Sites, data storage and management, and marketing and promotions. We only provide our Service Providers with the information necessary for them to perform these services on our behalf. Each Service Provider must agree to use reasonable security procedures and practices, appropriate to the nature of the information involved, in order to protect Personal Information from unauthorized access, use, or disclosure. Service Providers are prohibited from using Personal Information other than as specified by us.

### Our Business Customers and Business Users

If you are a Candidate, we may share your Personal Data, including your contact information, professional and employment-related information, demographic information, photos and inferences drawn from the foregoing categories, with our business customers and Business Users for their job search and employment recruiting purposes. Specifically, we share this information with our customers to help them find talented Candidates who may meet their employment needs, and to help them contact and engage with Candidates regarding opportunities that fit those Candidates’ skill sets and professional backgrounds. By sharing your Personal Information with our business customers and Business Users, we aspire to help you get to where you want to be professionally and personally, and hope that through our platform you will

receive better job offers and career development opportunities from companies that you want to work with.

### Advertising Partners

We may allow social media, third-party advertisers and service providers to collect internet and other electronic activity data when you visit the Sites and Services. These companies include LinkedIn, Facebook and digital advertising networks. These companies collect information to help us analyze the performance of our advertising, and they may also track your activity across different websites and over time to provide advertising based on your interests. These third parties typically use cookies to collect internet and other electronic activity data.

### Our Affiliates and in Corporate Transactions

We may share Personal Information with businesses controlling, controlled by, or under common control with SCOUT. Additionally, if SCOUT is merged, acquired, or sold, or in the event of a transfer of some or all of our assets, we may disclose or transfer Personal Information in connection with such transaction. You will have the opportunity to opt out of any such transfer if, in our discretion, it will result in the handling of your Personal Information in a way that differs materially from this Privacy Policy.

### Compliance with Laws and Law Enforcement

We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We may disclose Personal Information and any other information about you to government or law enforcement officials or private parties if, in our discretion, we believe it is necessary or appropriate in order to respond to legal requests (including court orders and subpoenas).



### Customer Data Input or Uploaded by Business Users

As part of utilizing our Services, our Business Users may provide us with information about Candidates or prospective employees. Business Users may also provide us with credentials to third-party sites or services in order to synchronize certain emails or other information with our Services, and may provide us with other information (collectively any such personal information we collect in these ways is “**Business Customer Data**”). We treat Business Customer Data as confidential and do not use it for any purposes other than delivering the Services to the customer or Business User who provided the Business Customer Data. We do not share or disclose Business Customer Data with any parties other than the customer or Business User who provided it.

We share your personal data with your consent or as necessary to provide any product / service you may have requested or authorised. For example, we share your content with third parties when you tell us to do so, such as when you are interested in a vacancy or a job offer interests you. In addition, we share personal data among SCOUT-controlled affiliates and subsidiaries. We also share personal data with vendors or agents working on our behalf for the purposes described in this policy. In such cases, these companies must abide by our data privacy and security requirements and are not allowed to use personal data they receive from us for any other purpose. We may also disclose personal data as part of a corporate transaction such as a merger or sale of assets. Finally, we will retain, access, transfer, disclose, and preserve personal data, including your content, when we have a good faith belief that doing so is necessary to do any of the following:

- Comply with applicable law or respond to valid legal process, including from law enforcement or other government agencies.
- Protect our customers, for example, to prevent spam or attempts to defraud users of our products, or to help prevent the loss of life or serious injury of anyone.

- Operate and maintain the security of our products, including to prevent or stop an attack on our computer systems or networks.
- Protect the rights or property of SCOUT, including enforcing the terms governing the use of the services –
- however, if we receive information indicating that someone is using our services to traffic in stolen intellectual or physical property of SCOUT, we will not inspect a customer's private content ourselves, but we may refer the matter to law enforcement.

### **Cookies and Automated Data Collection Technologies**

We use cookies (a small text file placed on your computer to identify your computer and web browser) and may use anonymous identifiers (a random string of characters that is used for the same purposes as a cookie). We use cookies and other anonymous identifiers to help deliver the content of our Sites, for authentication purposes (to keep track of the fact that you have logged in) and to analyze use of and improve the Sites and Services. We also use cookies and similar technologies to personalize content and to provide personalized features. Most web browsers are initially set up to accept cookies. You can reset your web browser to refuse all cookies or to indicate when a cookie is being sent. The “help” feature of the menu bar on most browsers will tell you how to stop accepting new cookies, how to receive notification of new cookies and how to disable existing cookies. However, certain features of the Sites or Services may not work if you delete or disable cookies. We may combine information from cookies or other identifiers with Personal Information that you have provided to us.

### **Our use of cookies and similar technologies**

SCOUT uses cookies and similar technologies for several purposes, depending on the context or product, including:

#### **Storing your preferences and settings.**

We use cookies to store your preferences and settings on your device, and to enhance your experiences. For example, depending on your settings, if you enter your city or postcode to get local information about job vacancies, we store that data in a cookie so that you will see the relevant local information when you return to the site. Saving your preferences with cookies, such as your preferred language, prevents you from having to set your preferences repeatedly.

**Professional and Social media.**

We can access data from professional and social media cookies, including those that enable users who are signed in to the professional and social media service to share content via that service.

**Feedback.**

SCOUT uses cookies to enable you to provide feedback on a website.

**Interest-based Information.**

SCOUT uses cookies to collect data about your online activity and identify your interests so that we can provide information / communication that is most relevant to you. You can opt out of receiving interest-based information from SCOUT as described in this privacy policy.

**Analytics.**

We use first- and third-party cookies and other identifiers to gather usage and performance data. For example, we use cookies to count the number of unique visitors to a web page or service and to develop other statistics about the operations of our products.

**Performance.**

SCOUT uses cookies to understand and improve how our products perform.

### **Transferring Data Outside the EEA & Appropriate Safeguards**

The data is hosted on SCOUT web servers in Singapore. If you are located in a non-Singapore jurisdiction, for example in the European Economic Area (“EEA”) / European Union (“EU”) (including the United Kingdom) by providing us with your personal data you consent to the transfer of such personal data, to Singapore, a jurisdiction that may not provide an equivalent level of data protection to the laws in your home country.

We have however taken steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected to the standard imposed by the EU data protection laws.

These measures include imposing contractual obligations on the recipients of your personal information or ensuring that the recipients are subscribed to ‘international frameworks’ that aim to ensure adequate protection.

Please contact us if you would like more information about the protections that we put in place to ensure the protection of your personal data.

### **Cookies & Social Plug-Ins**

If you do not provide us any of your personal information, we are limited in the information we may collect from you. For example, we may be able to determine your IP address for the purposes of administering the Site and tracking Site usage. However, your IP address may vary each time you visit or it may remain the same depending on the type of Internet connection you are using or the location from which you access the Site.

We may also collect information about the websites that directed you to the Site after you clicked on a text or banner link or an ad from another website, or the day and time you visited the Site and how long you spent on the Site. We aggregate such

information to help us to compile reports as to trends and other behaviour about users visiting our Site; however such information is anonymous and cannot be tied directly to you. We may also use “cookies” and your personal information to enhance your experience on the Site and with the services and to provide you with personalized offers. A cookie is a small data file placed on your computer’s hard drive that contains information that allows us to track your activity on the Site. The cookie itself does not contain any personal information; however, if you provide us any personal information the cookie may act as an identifier to tie your personal information to your IP address or computer. You may choose to delete cookies from your computer’s hard drive at any time or to disable cookies on your computer. If you delete cookies that relate to the Site, we may not be able to identify you upon your return to the Site. Additionally, if you disable your computer’s cookies, you may not be able to access certain features of the Site or services that require that cookies be enabled. The Site’s cookies cannot be used to read data from your hard drive and cannot retrieve information from any other cookies created by other websites. Additionally, our cookies cannot be used as a virus, Trojan horse, worm, or any other malicious tool that could impair your use of your computer. Our cookies are used to help us better understand how you and other users use the Site so we can continue to provide a better, more personalized user experience on the Site. To find out more about Cookies visit [www.youronlinechoices.com](http://www.youronlinechoices.com).

We use so-called social plugins (buttons) of professional and social networks.

When you visit our Site, these buttons are deactivated by default, i.e. without your intervention they will not send any data to the respective professional networks. Before you can use these buttons, you must activate them by clicking on them. They then remain active until you deactivate them again or delete your cookies. After their activation, a direct link to the server of the respective professional network is established. The contents of the button are then transmitted from the professional network directly to your browser and incorporated in the Site. After activation of a button, the professional network can retrieve data, independently of whether you

interact with the button or not. If you are logged on to a professional network, the network can assign your visit to the Site to your user account. If you are a member of a professional network and do not wish it to combine data retrieved from your visit to our Site with your membership data, you must log out from the professional network concerned before activating the buttons.

We have no influence on the scope of data that is collected by the professional networks through their buttons. The data use policies of the professional networks provide information on the purpose and extent of the data that they collect, how this data is processed and used, the rights available to you and the settings that you can use to protect your privacy.

### **Be Careful When You Share Information with Others**

Please be aware that if you share information on any public area of the Sites or Services or through our events, that information may be accessed by others, who may copy that information and make it public in other settings. This means that anyone with access to such information can potentially use it for any purpose, including sending unsolicited communications.

### **Links**

Our Sites and Services may contain links to other websites or allow others to send you such links. A link to a third party's website does not mean that we endorse it or that we are affiliated with it. We do not exercise control over third-party websites. You access such third-party websites or content at your own risk. You should always read the privacy policy of a third-party website before providing any information to the website.

### **Children's Privacy**

The Sites and Services are intended for users who are 18 years old or older. We do not knowingly collect Personal Information from children under the age of 18. If we become aware that we have inadvertently received Personal Information from a child under the age of 18, we will delete such information from our records. Users under the age of 18 may request the removal of their content or information publicly posted on the Sites or Services by emailing us at [support@getscout.ai](mailto:support@getscout.ai). Please note that some of the user content that appears on our Sites or Services is stored and controlled by third-party providers; thus, complete and comprehensive removal of the content may not be possible.

### **Managing Your Information Preferences if You Are a Business User**

If you are a Business User, you can review, correct, update, delete, or change most of your Personal Information used to establish your account by using your account settings. You can also opt out of receiving certain emails and other communications from us by emailing us at [support@getscout.ai](mailto:support@getscout.ai). You are able to opt out of receiving marketing emails from us; however, you cannot opt out of receiving all emails from us, such as emails about the status of your account with us. If you have questions or concerns regarding this Privacy Policy, please email us at [privacy@getscout.ai](mailto:privacy@getscout.ai).

### **Candidate Access Right and Your Right to Opt Out of SCOUT**

SCOUT an AI powered search engine to find top tech talent. SCOUT is a Software as a Service (SaaS) service featuring software and / or Google Chrome plug in for use by hiring managers, recruiters and staffing firms for candidate data and information, allowing professionals to contact employment candidates, suggest suitable candidates, recruiting workflow automation, and ranking of employment candidates. We respect your control over your personal information, and, upon request, we will confirm whether we hold or are processing information that we have collected or gathered about you. If we have collected your personal information, we will provide you with a copy of that information. You may also amend or update inaccurate or incomplete personal information, request deletion of your personal information, or request that we no longer use it. Under certain circumstances we will not be able to

fulfill your request, such as when it interferes with our regulatory obligations, affects legal matters, we cannot verify your identity, or it involves disproportionate cost or effort. In any event, we will respond to your request within a reasonable timeframe and provide you an explanation of our course of action. To make a request, please email us at [support@getscout.ai](mailto:support@getscout.ai) using the email subject line “Opt-Out”.

SCOUT helps our business customers and Business Users find candidates to fill their employment needs. To do this, we gather and index Personal Information of Candidates from the sources described above so it can be searched by our business customers and Business Users for employment recruiting purposes. We aim to provide the most comprehensive results when our business customers and Business Users search, source, evaluate and manage talent to fill their employment needs.

**To opt out or exercise other rights described above**, you will need to verify your identity by providing us with your first and last name and an email address that we have on file for you and we will remove your information from our system. We will follow up with you if we need further information in order to honor your request.

Please note, we may need to retain certain data about you to ensure that we can continue to honor your request to opt out. We will maintain the minimum amount of information necessary for this purpose, and will not share this information with employers, recruiters or other users of our services.

### **Browser-based controls**

When you use a browser, you can control your personal data using certain features.

### **Security of your Data**

We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of your data having regard to the state of the art, the nature of the data and the risks to which they are exposed. These include internal reviews of our data collection, storage and processing practices and security measures, as well as physical security measures to guard against unauthorized access to systems where we store personal data.



We restrict access to personal information to SCOUT employees, service providers and agents who need to know that information in order to operate, develop or improve our products and services. These individuals are bound by confidentiality obligations and may be subject to discipline or other sanctions if they fail to meet these obligations.

We use secure socket layer (“SSL”) technology to encrypt and protect the security of your personal information, including but not limited to your credit card number, when it is sent over the Internet. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, while we strive to protect your personal information, we cannot guarantee its absolute security.

### **Your Rights associated with your information**

If we are storing your personal information, you have the following rights to your information based on the services and your region.

You may access, correct, or request deletion of your Personal Information by contacting Us at [privacy@getscout.ai](mailto:privacy@getscout.ai). We will respond to your request within a reasonable timeframe.

When acting as a service provider of Our Customer, Scout has no direct relationship with the individuals whose Personal Information is provided to Our Customer through the Services. An individual who is or was employed by one of Our Customers and who seeks access to, or who seeks to correct, amend, object to the processing or profiling of, or to delete his/her Personal Information in the Platform, should direct his/her query to the HR department of the Customer Organization that uses the Platform and for which he/she works or used to work if he/she cannot make the appropriate changes via its access to the Platform provided by the Customer.

### **Changes to the privacy policy**

The terms of this Privacy Policy will govern the use of the Service and any information collected in connection therewith, however, Scout may amend or update this Privacy Policy from time to time. The most current version of this Privacy Policy will always be posted at [https://getscout.ai/SCOUT\\_PRIVACY\\_POLICY.pdf](https://getscout.ai/SCOUT_PRIVACY_POLICY.pdf). Unless otherwise agreed with the Customer, we will endeavour to provide notice of material changes to this policy on the homepage of the website and (if applicable) via an e-mail. Such material changes will take effect seven (7) days after such notice was provided on our website or sent by email. Otherwise, all other changes to this Privacy Policy are effective as of the stated "Last Revised" date and your continued use of Services will constitute your active acceptance of, and agreement to be bound by, the changes to the Privacy Policy.

### **Contact Us**

If you have any questions, feedback or to report a violation regarding this Privacy Policy, you may email us at [privacy@getscout.ai](mailto:privacy@getscout.ai) or contact us by mail addressed to Technowledgey Pte Ltd, 100 Peck Seah St, #08-14, S079333.