



Privacy Policy

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Policy: A2001

This Privacy Policy (“Policy”) describes Arkto Digital, LLC. (“Arkto Digital”) and its affiliates’ and subsidiaries’ practices for collecting, using, sharing, and protecting information relating to identifiable people.

Collection and Processing of Your Personal Data

Personal data means information that identifies you as an individual or from which you may be identified. Non-personal information means information that does not directly identify you. We collect both types of information about you. The following provides some examples of the type of information that we collect and what we use that information for:

Types of Data, Purpose for Collection, and Use of Data

Business Contact Information

We collect business contact information, and billing information, from our clients and our potential clients for a legitimate business purpose. We use this information in order to provide products, services, or information about our products and services.

Potential Candidates

Arkto Digital gathers personal data about individuals who might be interested in a current, or future, position with Arkto Digital. Such information includes address, contact information, job role, function, social media presence, work or educational experiences that may be relevant in a candidate search.

Email Interconnectivity

If you receive email from us, we may use certain tools to capture data related to when you open our message or click on any links or banners/images within it. We may also take the information in your emails and add it to our contacts and log it with our customer relationship management (CRM) system.

Employment

If you apply for a Arkto Digital job posting, or become an employee at Arkto Digital, we collect information necessary to process your application or to further the employment relationship. This may include, among other things, your Social Security Number.

Feedback/Support

If you provide us feedback or contact us, we will collect your name and email address, as well as any other content that you send to us, in order to reply.

Mailing List

When you sign up for one of our mailing lists, we collect your name, email address, LinkedIn/website address, how you heard about us and the reason for your contact.

Mobile Devices

We collect information from mobile devices such as unique identifying information broadcast from devices when visiting our website using Google Analytics.

Surveys

With survey participation, we collect information provided through the survey. If the survey is provided by a third-party service provider, the third party’s privacy policy applies to the collection, use, and disclosure of information.

Web logs

We collect your browser type, operating system, Internet Protocol (IP) address (a number that is automatically assigned to a computer when using the Internet), domain name, click-activity, referring website, viewed websites and/or a date/time stamp for visits through Google Analytics.

Cookies and first party tracking

We use cookies and clear GIFs. “Cookies” are small pieces of information that a website sends to a computer’s hard drive while a website is viewed. We use both session cookies (which expire once a web browser is closed) and persistent cookies (which stay on a device until deleted). Among other things, cookies allow us to provide a more personal and interactive experience and

to improve our marketing efforts. Persistent cookies may be removed by following instructions provided by the browser. If cookies are disabled some areas or features of our websites may not work properly.

We collect personal information about you from a variety of sources, including when you visit our website, when you voluntarily provide information to us, when information is publicly posted (e.g., Google, Facebook, Twitter, LinkedIn, etc.), or when we receive it from third parties such as our clients.

There may be instances in which the information that we collect is considered sensitive personal data under the laws of the country or state in which you reside. As a general matter, we only collect sensitive personal data when it is necessary for us to do so.

Use of Information

In addition to the purposes and uses described above, we may use personal information in the following ways:

- To contact individuals who may be interested in an opportunity to be employed by one of our clients.
- To respond to your inquiries related to support, employment opportunities, or other requests.
- To provide the products and services you request.
- To improve our services and product offerings.
- To conduct analytics.
- To send marketing and promotional materials, including information relating to our goods, services, sales, or promotions.
- For internal administrative purposes, as well as to manage our relationship with you.
- To, in an aggregated or anonymized form, generate industry reports about trends such as trends in hiring and compensation.
- To assess whether you may become a potential client in the future.

As discussed in the sections above, our collection and processing of your information is based in different contexts upon your consent, our need to perform a contract, our obligations under law, and/or our legitimate interest in conducting our business.

Sharing of Information

In addition to the specific situations discussed elsewhere in this policy, we disclose information in the following situations:

Affiliates and Acquisitions

Companies affiliated with Arkto Digital may use the information in connection with processing your inquiries, providing services, and improving our products and services. In limited situations we may also share Business Contact Information that we collect with one of our affiliated companies so that they can provide you with information concerning the products or services that they provide. We may also share your information if another company acquires our company, business, or our assets.

Other Disclosures with Your Consent

We may ask if you would like us to share your information with other unaffiliated third parties who are not described elsewhere in this policy.

Other Disclosures without Your Consent

We may disclose information in response to subpoenas, warrants, or court orders, or in connection with any legal process, or to comply with relevant laws. We may also share your information in order to establish or exercise our rights, to defend against a legal claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies, or to comply with your request.

Service Providers

Arkto Digital may provide personal data to third parties that act as agents, consultants or contractors to perform tasks on behalf of and under Arkto Digital's instructions. Such recipients must agree to abide by confidentiality obligations and are not permitted to use your personal data except for the limited purpose that we request.

Third Party Tracking Companies

We may share your information with our analytics partners. These third parties may also collect information directly from you as described in this Privacy Policy over time and across different websites. The privacy policy of these third-party companies applies to their collection, use and disclosure of your information. For example, one of our partners is Google Analytics which collects information anonymously and reports website trends without identifying individual visitors.

Retention of Information

We retain personal information for the period necessary to fulfill the purposes outlined in this policy, unless a longer retention period is required or permitted by law, or an individual requests that we delete information about them.

Protecting Information

Arkto Digital uses industry-standard security technologies and procedures to ensure data security and integrity for personal data. Arkto Digital also uses reasonable organizational, technical and administrative measures to protect against unauthorized access, misuse, loss, disclosure, alteration and destruction of personal information (under its control) about users of its online client services. Unfortunately, data transmission over the Internet cannot be guaranteed as 100% secure. Therefore, while Arkto Digital strives to protect your personal data, Arkto Digital cannot guarantee the security of personal information. In the event that Arkto Digital is required to notify you about a situation involving your data, Arkto Digital may do so by email, telephone, or mail to the extent permitted by law.

Your Choices

You can make the following choices regarding your personal information:

- Access, Correction, and/or Deletion of Your Personal Information. You may request to access, correct, or delete the personal information that Arkto Digital has collected about you by writing to the contact listed below under the section titled "Contact Information." When we delete personal information, it will be removed from our active database, but it may remain in archives where it is not practical or possible to delete it.
- Ability to object to processing. You may object to our continued processing of your personal data. If we receive an objection, we will evaluate whether we are required by law to discontinue such processing.
- California Residents. California residents may be entitled to ask us for a notice describing what categories of personal information (if any) we share with third parties or affiliates for direct marketing. If you are a California resident and would like a copy of such notice, please submit a written request to us using the information in the "Contact Information" section below.
- Online Tracking. We do not currently recognize automated browser signals regarding tracking mechanisms, which may include "Do Not Track" instructions.
- Promotional Emails. You may choose to provide us with your email address for the purpose of allowing us to send free newsletters, surveys, offers, and other promotional materials to you, as well as targeted offers from third parties. You can stop receiving promotional emails by following the unsubscribe instructions in e-mails that you receive or contacting us using the information below. If you decide not to receive promotional emails, we may still send you service-related communications.
- Opt-Out / Revocation of Consent. If we rely on your consent to process personal information you may revoke that consent by writing to the contact listed below under the section titled "Contact Information." Note that in some situations we may no longer be able to provide you services if you revoke your consent; we may also limit or deny your request to revoke consent if the law permits or requires us to do so, or if we are unable to adequately verify your identity.
- Different Purposes. If we use your information for a materially different purpose than it was collected, we will offer you the ability to either opt-in or opt-out of such a use, as required by law.

Transmitting Information to Other Countries

Personal information may be processed in a country where you do not reside that has privacy laws that may be less stringent than the laws in your country. Where possible we take steps to treat personal information using the same privacy principles that apply pursuant to the law of the country in which we first received your information. By submitting your personal information to us you agree to the transfer, storage and processing of your information in a country other than your country of residence including, but not necessarily limited to, the United States. If you would like more information concerning our attempts to apply the privacy principles applicable in one jurisdiction to data when it goes to another jurisdiction you can contact us using the contact information below.

Contact Information

If you have any questions or concerns related to this Privacy Policy, please contact Arkto Digital, LLC. at:

ARKTO DIGITAL, LLC.
ATTN: REGISTERED AGENT
PO. Box 61522
San Angelo, TX, 76906

abuse@arktodigital.com

If you are not satisfied with our response, and are in the European Union, you may have a right to lodge a complaint with your local supervisory authority.

Miscellaneous

Modifications to Policy. We may change our privacy policy and practices over time. To the extent that our policy changes in a material way, the policy that was in place at the time that you submitted personal information to us will generally govern that information. You will be provided with notice of material changes to the Policy.

Affiliated Companies. Some Arkto Digital affiliates, programs and/or sites may have their own, possibly different, privacy policies. Arkto Digital encourages you to read the privacy policies of any of Arkto Digital's affiliate websites that you may visit.