

Good A Different Way Privacy Policy

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This Website, Go A Different Way, is operated by Sparrow Consultants LLC, ("Sparrow"), and Sparrow respects the privacy of our users. This privacy policy (the "Privacy Policy") describes how we collect, use, store, and disclose information in connection with our Services and with our Website. By accessing our Website and/or using our Services, you agree to the provisions of this Privacy Policy and to our Terms of Service. Unless otherwise defined herein, capitalized terms have the meanings defined in the Terms.

Please note that except as otherwise described below, this Privacy Policy does not apply to the processing of any information by third parties. For example, some actions may redirect the user to a third-party site for further action. Information collected through such a third-party site is not subject to this Privacy Policy but is instead subject to the third-party's privacy policy. Similarly, information that users submit directly not via the Website is not covered by this Privacy Policy.

Information We Collect

We collect certain information about users, including Personal Information, to fulfill our lawful business interests, including in connection with the Services. "Personal Information" is any information related to an identified or identifiable person, including by reference to an identifier such as a name, location data, email address or phone number, or other factors specific to a person's identity. We collect only the information necessary to fulfill our lawful business interests and keep your information only for as long as is necessary to fulfill those interests. We may combine Personal Information with other information, in which case we will treat the combined information as Personal Information. We also may combine information that we collect about you through the Services with additional information that we or third parties collect in other contexts—such as our communications with you via email or phone, or our customer service records. In those circumstances, we will treat the combined information in accordance with this Privacy Policy.

You can visit the Website and use some of the Services without providing any information, including Personal Information. However, if you choose not to provide Personal Information, we may not be able to provide you with full access to, or use of, the Services. As described below, we do automatically collect certain information when you use the Services. The Services also require you to provide Personal Information when you register.

Information about Users. We collect various types of Personal Information about users in connection with the Services, which may include: name, mailing address, email address, username and password, work and educational history, company and job title, photograph, other information contained on users' resumes, content posted by users, information about which jobs users are seeking, location information, and payment information.

Surveys. From time to time, we may ask users to participate in surveys, contests, promotions, and sweepstakes which may be used to collect Personal Information. Participation is completely voluntary and declining to participate will not impact your use of the Services.

Payment Information We collect certain payment and billing information when you purchase Services. You might also provide payment information which we collect via secure payment processing services.

Other information collected automatically through the Services. We also collect information automatically through the Services. This may include information such as your IP address and domain name, your location as inferred from your IP address, your Internet service provider, the date and time of your visit to the Website, your use of the Services during your current session and over time (including the pages you view and the files you download), the URLs from the websites you visit before and after navigating the Website, your computer's and/or mobile device's operating system and browser type, and your software and hardware attributes (including device IDs). We collect such information using a variety of mechanisms, including the following:

- **Server Logs.** When you visit the Website, we automatically receive and record certain information from your computer (or other devices) and your browser. This may include data such as your IP address, the web pages you visit, or features you use on the Website, and your general geographic location as inferred from your IP address. To obtain such information, we may use server logs or similar applications that recognize your computer or other devices and gather information about their online activity.
- **Cookies.** Cookies are small files that are stored on your computer or other device by your web browser. We use cookies in providing the Services. A cookie allows the Services to recognize whether you have visited before and may store user preferences and other information. For example, cookies can be used to collect information about your use of the Services during your current session and over time (including the pages you view and the files you

download), your computer or device's operating system and browser type, your Internet service provider, your domain name and IP address, your general geographic location, and the website you visited before and after accessing the Services. If you are concerned about having cookies on your computer, you can set your browser to refuse all cookies or to indicate when a cookie is being set, allowing you to decide whether to accept it. You can also delete cookies from your computer. However, if you choose to block or delete cookies, certain features of the Website may not operate correctly. We use the following types of cookies to collect information:

- *Essential Cookies:* These cookies are essential to the functioning of the Services and allow you to interact with and use the features of the Services. If these cookies are not permitted by your browser, we cannot provide certain Services to you.
- *Preference Cookies:* These cookies are used to collect information about your choices and preferences, such as your preferred language or the country from which you access our Services. We use this information to customize your Services.
- *Analytics Cookies:* Our third-party service providers may use cookies to collect information about you and the use of the Services for analytics purposes. For more information and to opt out, please read the section below titled "Third-Party Analytics and Targeted Advertising."

Advertising Cookies: The Services may use cookies to make advertising messages more relevant to you. For more information and to opt out, please read the section below titled "Third-Party Analytics and Targeted Advertising."

- *Pixel tags.* The Services may use an application known as a "pixel tag" (also known as a "clear gif" or "web beacon"). A pixel tag is an electronic file that usually consists of a single-pixel image. It can be embedded in a web page or in an email to transmit information, which could include Personal Information. For example, it allows an email sender to determine whether a user has opened a particular email. Deleting or blocking cookies will not stop the collection of information through pixel tags and similar tracking mechanisms. However, as discussed in the section below titled "Third-Party Analytics and Targeted Advertising," you can take steps to limit how such information is used for advertising purposes. Even in that event, we may continue to use the information for other purposes, including analytics.
- *Local storage.* We also may use HTML5 local storage to collect and retain certain information about you. Data in local storage is not deleted when you clear your cookies, but it can be deleted by following the instructions provided by your browser developer.

Information collected on third-party sites. In some cases, we use the mechanisms described above to track users when they navigate to and on third-party sites. For example, we may use cookies, pixels, scripts, or other tracking mechanisms to identify when a user of the Services goes to the website of one of our business partners and applies for a job. This information enables us, among other things, to analyze how many applicants for a specific position learned about it via Sparrow. Although we do not disclose Personal Information combined with such tracking data to our business partners, we may provide de-identified information and analytics as discussed in the section below titled "How We Share Information with Third Parties."

How We Use Information

We use the Personal Information that we collect about users to:

- Provide the Services and create a custom experience for users and tailor our Services to users' individual interests and preferences;
- Fulfill the terms of any agreement you have with us, respond to your requests, or otherwise complete a transaction that you initiate, including payment processing;
- Post job notices and other company information for employers;
- Transmit or redirect Users' job applications to employers;
- Communicate with users through email notices, newsletters, and updates, including promotional communications about topics, products, jobs, and Services that we believe will be of interest to users;
- Administer surveys, contests, or promotions;
- Engage in analysis and research concerning the Services, improve users' experiences with the Services, and otherwise enhance the quality of our products and Services;
- Comply with legal and/or regulatory requirements, or to protect our rights and interests, as described below in the "Legal Purposes" subsection of this Privacy Policy;

- Compile and share aggregated information;
- Count and recognize visitors to the Services and analyze how visitors use the Services;
- Engage in analytics or targeted advertising as described in the “Third-Party Analytics and Targeted Advertising” section below; and
- For any other business purpose permitted by law.

How We Share Information with Third Parties

Sparrow does not sell or give your information to third parties. We respect your choices and your privacy and work hard to maintain that trust.

Sparrow may share information with third parties for a variety of purposes. We share information with the following third parties and in the following ways:

Affiliates. We may share information, including Personal Information, with our corporate affiliates for the purposes described in this Privacy Policy.

Service providers. We use third-party service providers to help us manage and improve the Services. We provide these parties with only the information they need to perform their services and work closely with them to ensure that your privacy is respected and protected. These service providers may collect and/or use your information, including Personal Information, to assist us in providing Services and in achieving the purposes discussed in this Privacy Policy. For example, we integrate certain plug-ins offered by third-party service providers. Even if you do not click on these plug-ins, they may collect information about you, such as your IP address. They also may set and/or access cookies. These plugins are governed by the privacy policy of the company providing them.

Other users of the Services. We may share information, including Personal Information, with other users of the Services where appropriate. For example, if you submit information to us or complete an application, we may share that information with an employer who will evaluate your application. Similarly, we may share a user’s contact information with a coach to enable them to communicate directly.

Business partners. We also may share your information, including Personal Information, with our business partners to fulfill your requests for the Services; complete a transaction that you initiate; or meet the terms of any agreement that you have with us or our business partners.

Your direct sharing of Personal Information through the Services and third-party websites and services. The Services may enable you to share Personal Information directly through the Services or through a third-party. For example, the Services may allow a User to upload a resume or job history to share with an employer through the Website or post content or career related questions on a forum. The Services may also provide a text-based or chat communication platform to connect users and coaches. In addition, the Services may contain links to third-party websites that incorporate comment and social media features, including the Facebook “like” button and the Twitter “follow” button. If you choose to use these features, you may disclose your Personal Information not just to those third-party websites and services, but also to their users and the public more generally. Because these third-party websites and services are not operated by Sparrow, we are not responsible for the content or practices of those websites or services. The collection, use, and disclosure of your information will be subject to the privacy policies of the third-party websites or services, and not this Privacy Policy.

Legal purposes. We also may use or share your information, including Personal Information, with third parties when we believe, in our sole discretion, that doing so is necessary:

- To comply with applicable law or a court order, subpoena, request from government or law enforcement, or other legal process;
- To investigate, prevent, or take action regarding illegal activities, suspected fraud, or situations involving threats to our property or the property or physical safety of any person or third party;
- To establish, protect, or exercise our legal rights or defend against legal claims; or
- To facilitate the financing, securitization, insuring, merger, acquisition, sale, assignment, bankruptcy, or other disposal of all or part of our business or assets. In the event of an actual sale, merger, reorganization, dissolution or similar event relating to all or a portion of our business or assets, your information, including Personal Information, may be part of the transferred assets.

De-identified or aggregated information. We also may compile and share de-identified or aggregated information about users of the Services, such as by publishing a report on trends in the usage of the Services or sharing aggregated information about historical and real-time trends in employment.

Third-Party Analytics and Targeted Advertising

We partner with certain third parties to collect information to engage in analytics, auditing, research, and reporting. These third parties may use web logs, pixel tags, or similar online tracking mechanisms, and they may set and access cookies on your computer or other device. For example, as discussed above, employers may use pixel tags or scripts supplied by Sparrow to track when users navigate to their websites and submit job applications.

Among other providers, the Services use [Google Analytics](#) to help collect and analyze certain information for the purposes discussed above. You may opt out of the use of cookies by Google Analytics [here](#).

The Services may also enable third-party tracking mechanisms to collect information on our Services over time and across unaffiliated websites for use in online behavioral advertising. For example, third parties may use the fact that you visited the Website to target online ads for the Services to you on websites that are not affiliated with Sparrow. In addition, our third-party advertising partners might use information about your use of the Services to help target advertisements unrelated to Sparrow based on your online behavior in general. For information about behavioral advertising practices, including privacy and confidentiality, visit the websites for the [Network Advertising Initiative](#) and the [Digital Advertising Alliance](#).

The use of online tracking mechanisms by third parties is subject to those third parties' own privacy policies, and not this Privacy Policy. If you prefer to prevent third parties from setting and accessing cookies on your computer, you may set your browser to block cookies. Additionally, you may remove yourself from certain targeted advertising by using the opt-outs offered by: [Network Advertising Initiative](#); [Digital Advertising Alliance](#); [TRUSTe's opt-out tool](#); [The Digital Advertising Alliance of Canada](#) (for users in Canada); and [European Interactive Digital Advertising Alliance](#) (for users in the EU).

Security

Sparrow uses physical, electronic, and procedural safeguards to protect your information against loss or unauthorized access, use, modification, or deletion. However, no security program is 100% secure, and thus we cannot guarantee the absolute security of your information.

Your Choices and Access to Information

Depending on your location, including the European Economic Area and the United Kingdom, and where applicable law requires, you may have the following rights with respect to your Personal Information:

- to access your Personal Information;
- to update your Personal Information by emailing us or, where appropriate, amending the personal details contained in your registered account with us. If practically possible, we will make corrections based on your updated information;
- to withdraw your consent with respect to Personal Information that is collected on the basis of your consent;
- to request deletion of your Personal Information or object to its processing; and
- to lodge a complaint with us or, as applicable, with a supervisory authority.

If you want to learn more about the Personal Information that Sparrow has about you, or you would like to exercise your choices regarding your Personal Information, please contact us by email at info@sparrowconsultants.com or by mail at the address in the "Questions or Comments" section below.

If you no longer want to receive marketing communications from Sparrow, please follow the "unsubscribe" instructions that are included at the bottom of each message. Please note that if you unsubscribe from our marketing communications, you will still receive administrative messages.

Due to technical reasons there may be a delay in accessing or deleting your Personal Information from our systems if you request it. We also will retain Personal Information in order to comply with the law, protect our and others' rights, resolve disputes or enforce our legal terms or policies, to the extent permitted under applicable law.

Transfer of Information to the United States

The information that we collect through or in connection with the Services is transferred to and processed in the United States for the purposes described above. Sparrow also may subcontract the processing of your data to, or otherwise share your data with, affiliates or third parties in the United States or countries other than your country of residence. The data-protection laws in these countries may be different from, and less stringent than, those in your country of residence. By

accepting this Privacy Policy, using the Services, or providing information to us, you expressly consent to such transfer and processing.

Children's Privacy

The Services are not directed to children under the age of 16, and Sparrow does not knowingly collect Personal Information or other Information from anyone under the age of 16. If you are under age 16 you may not, under any circumstances or for any reason, use the Services.

California Privacy Rights

This section provides additional details about the Personal Information we collect about California users and the rights afforded to them under the California Consumer Privacy Act or "CCPA."

For more details about the Personal Information we have collected over the last 12 months, including the categories of sources, please see the Information We Collect section above. We collect this information for the business and commercial purposes described in the How We Use Information section above. We share this information with the categories of third parties described in the How We Share Information with Third Parties section above. Sparrow does not sell the Personal Information we collect (and will not sell it without providing a right to opt out).

Subject to certain limitations, the CCPA provides California users the right to request more details on the categories or specific pieces of Personal Information we collect (including how we use and disclose this information), to delete their Personal Information, and to opt out of any "sales" that may be occurring.

California users may make a request pursuant to their rights under the CCPA by contacting us at privacy@themuse.com and Sparrow will not discriminate against any users who exercise such rights under the CCPA. We will verify your request using the Personal Information available to us, including email address. Users can also designate an authorized agent to exercise these rights on their behalf.

Changes to this Privacy Policy

We may update or modify this Privacy Policy from time to time. We will give you notice of the changes by posting an updated version online, updating the "Revised" date above, or, in the event of a material change, by emailing you at an email address you have provided. Changes to this Privacy Policy will be effective as of the date we post them or otherwise notify you of them, unless we specify a different effective date when we make a particular change. Your continued use of the Services will constitute your acceptance of the changes. If you do not agree to a change, you must stop using the Services.

Third-Party Links, Websites, and Apps

The Services may contain links to and from the websites or apps of other third parties. If you follow a link to any of these websites or apps, please note that these websites and apps, and any services that may be accessible through them, have their own privacy policies. We are not responsible for the privacy practices of other websites or apps. We encourage our users to be aware when they leave the Website and to read the privacy policies applicable to such third-party websites and apps. This Privacy Policy applies solely to information collected in connection with the Services.

Sensitive Information

We do not knowingly collect, and we ask that you not send us, and you not disclose, any sensitive Personal Information on or through the Services. Such information includes, but is not limited to, social security numbers, financial account information (except for payment information as required), and information related to or revealing racial or ethnic origin, political opinions, religion or other beliefs, health, criminal background, or trade union membership.

Contact Information; Questions or Comments

If you have any questions or comments regarding our privacy practices or this Privacy Policy, please send us an email to info@sparrowconsultants.com or contact us by mail at:

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