

# Supplemental Privacy Statement

Effective Date: March 16, 2023

## Introduction

This privacy statement (this “**Privacy Statement**”) explains Personnel Decisions Research Institutes, LLC’s (“**PDRI**”, “**we**”, or “**us**”) commitment to comply with California, Colorado, and Virginia law and applies to Personal Information (defined below) collected through the website and PDRI products and services that link to this Supplemental Privacy Statement (the “**Services**”). Please read this Supplemental Privacy Statement in conjunction with the Privacy Policy that is linked [here](#) (the “**Privacy Policy**”).

## Definitions

**Business Purposes** includes the following:

- **Audit** means auditing compliance with any applicable terms of use, this Privacy Statement, the Privacy Policy and applicable law. It also means auditing current interaction with a user and concurrent interactions with others, such as auditing access to particular content or features.
- **Debugging** means identifying and repairing errors that impair existing intended functionality.
- **Evaluation** means undertaking internal research to assess the effectiveness of the Services and for technological development and demonstration.
- **Maintenance and Improvement** means undertaking activities to verify or maintain the quality or safety of the Services, and to improve, upgrade or enhance the Services.
- **Provide the Services** means delivering and providing the Services, including, but not limited to, maintaining accounts, providing customer service and verifying customer information.
- **Security** means detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity and taking appropriate action for those responsible for that activity.
- **Short-Term Use** means short-term, transient use related to a current interaction with a California resident, such as the contextual customization of ads shown as part of the same interaction. In Short-Term Use, the Personal Information is not disclosed to another third party and is not used to build a profile about a consumer or otherwise alter an individual consumer’s experience outside the current interaction.

**Personal Information** means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or their household. Categories of Personal Information include the following:

- **Identifiers** means information used to identify a particular user, such as name, email address, user name, IP address or other online identifier.

- **Customer Records** means categories of customer personal information described in California Civil Code 1798.80, including name, address and education information.
- **Protected Class Characteristics** means characteristics identified under California and/or federal law such as race, ethnicity, national origin, disability, veteran or military status.
- **Commercial Information** means information about products or services purchased, used or considered by a User.
- **Biometric Information** means genetic or biological characteristics, such as information derived from fingerprint, iris or retina scans.
- **Internet or Other Similar Network Activity** means information generated from interaction with a website or the internet.
- **Geolocation Data** means information about the geographic location from where a user accessed the Services.
- **Sensory Data** includes audio, electronic and visual information.
- **Professional or Employment-Related Information** means current or past job history.
- **Inferences Drawn from Other Personal Information** means inferences that create a profile about User's preferences, characteristics, intelligence, abilities and aptitudes.
- **Sensitive Personal Information** means personal information that reveals certain information about a consumer that are generally considered to be sensitive in nature, including:
  1. Any communications you have with a third party (ie, somebody outside our business)
  2. Biometric data processed to identify an individual
  3. Data about sexual orientation or sex life
  4. Financial account details in a combination (for example card number and password) that gives access to an account
  5. Genetic data
  6. Government-issued numbers (such as a social security number or a number on a passport, or driver's license)
  7. Health data
  8. Philosophical or religious beliefs
  9. Precise geolocation
  10. Racial or ethnic origin
  11. Union membership
  12. Information from a known child

## How long will PDRI hold onto my Personal Information?

We will keep each category of your Personal Information, as identified in the table above, only for as long as necessary to fulfil the purposes, including Business Purposes, for which we are processing that category of your Personal Information and to meet legal and audit requirements, or as long as you continue to engage with the Services, or longer with your consent.

## Sale of Personal Information

We do not sell Personal Information collected through the Services in exchange for any payment of money.

## Privacy Rights

Residents of California, Colorado and Virginia have certain rights related to their Personal Information collected by and on behalf of a business. Depending on where you live and PDRI's role in collecting and/or processing your Personal Information, you may have the following rights:

- to request access to your information including a request to receive a written report of the categories and sources of information and/or the specific Personal Information held by PDRI. Your request may be limited to information collected within the previous twelve (12) months;
- to update or correct your Personal Information;
- to ask that we remove or delete your Personal Information with some exceptions. For example your request for deletion of your Personal Information may not interfere with an in-process transaction, investigation or legal obligation;
- to appeal a decision in response to a request regarding your Personal Information;
- to withdraw your consent to the processing of your Personal Information;
- to ask that we limit or restrict the processing of your Personal Information;
- to ask that we transfer your information to another service provider;
- to object to our processing of your Personal Information;
- to opt out of automated processing which has a significant impact (such as profiling);
- to opt out of the sale or sharing of their Personal Information or to require affirmation authorization to sell or share Personal Information if you are under the age of 16;
- to limit the use or disclosure of Sensitive Personal Information which is not necessary for the Services provided;
- to complain to a regulator about the handling of your Personal Information; or
- to not be discriminated against for exercising any of your rights related to your data.

We will not discriminate against you because you exercised any of the aforementioned rights. Unless permitted by applicable law, we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through the use of discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; or
- Suggest that you receive a different price or rate for goods or service or at a different level or quality of goods or services.

**PDRI will not use or disclose your Sensitive Personal Information, collected through the Services, without your consent. PDRI does not use or disclose Sensitive Personal**

**Information for any purpose other than that which is necessary to perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services, or as otherwise permitted by law.**

## **How to Make a Request to Exercise your Rights**

To request access to a report of your data or deletion of your Personal Information, please contact [support@pdri.com](mailto:support@pdri.com).

We will not require a California resident to set up an account in order to make a request or receive the requested information. In order to respond to a request, however, we must be able to reasonably verify, understand and fulfill the request. We will not be able to respond to the request if we are unable to verify identity or the authority to make the request. In conducting verification, we generally will use Personal Information previously collected by us. If the request is made on behalf of another individual, we may require additional verification and documentation of the individual's authority to make the request. In responding to requests, we may limit the information provided for privacy and security reasons, as permitted by law.

We will process your request within the time required by the law or inform of the basis for any unexpected delays.

**To request correction** of incorrect information associated with you, or for any other questions about your rights associated with your Personal Information, or to appeal a decision in response to a request to exercise any of the above privacy rights, please contact [support@pdri.com](mailto:support@pdri.com).

## **Changes to this Supplemental Privacy Statement**

We may update this Privacy Statement from time to time in the same way that we update the Privacy Policy that linked to it (provided [here](#)).

## **Contact Information**

If you have any questions or comments about this Privacy Statement or your rights under California law, please contact us at [support@pdri.com](mailto:support@pdri.com).