

VAULT EVENTS® PRIVACY POLICY

Infobase Holdings, Inc. d/b/a (“Vault Events”) understands that your privacy is important to you and has developed this clear and simple Privacy Policy to help you use Vault Events’ services with confidence. Please be sure to read this privacy statement carefully and feel free to address any questions or concerns regarding Vault Events’ use of your information to: fairs@vault.com. Our goal is to provide you with the very best service and user experience possible.

Vault Events exists to facilitate introductions and the exchange of information between employers and educational institutions, on the one hand, and prospective employees and students on the other, when they sign up to use our services. We may share your personally identifying information to further this purpose; however, we will not sell, rent, or share Your Information with any third parties except as described in this Privacy Policy.

WHAT INFORMATION WE MAY GATHER

You may browse public areas of the Vault Events website (the “Website”) without entering any personally identifying information. When you sign up for an account with Vault Events or join an online employment or educational fair or other event, we will ask for your contact information, such as your name, email address and phone number. We may ask a marketing question, such as “How did you hear about us?” We may also ask for additional demographic or other information that may help sponsoring, hosting, or participating organizations to better understand their audience. You may provide this information or choose not to answer such questions. (Collectively, the information described above will be referred to hereafter as “Your Information.”)

Information Collected Automatically.

Generally.

When you use our Services, some information may be automatically collected. For example, when you use our Services via a mobile device, your geographic location, how you use the Services, information about the type of device you use, your mobile network information, your Open Device Identification Number (“ODIN”), your date / time stamps for visit, unique device identifier (“UDID”), and your browser type, operating system, Internet Protocol (IP) address, and domain name all may be collected. This information is generally used to help us deliver the most relevant information to you and administer and improve the Services. In addition, in the event our Services crash on your mobile device, we may receive information about your mobile device model software version and device carrier, which allows us to identify and fix bugs and otherwise improve the performance of our Services.

Log Files.

As is true of most websites, we gather certain information automatically and store it in log files. This information may include IP addresses, browser type, Internet service provider (“ISP”), referring/exit pages, operating system, date/time stamp, and clickstream data. We use this information to maintain and improve the performance of the Services and to direct our

advertising.

Cookies.

Like many online services, we use cookies to collect information. “Cookies” are small pieces of information that a website sends to your computer’s hard drive while you are viewing the website. We and some third parties may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on our Services and to market the Services or other products.

We use a third-party tracking service that uses Cookies to track non-personally identifiable information about visitors to the Website in the aggregate to capture usage and volume statistics to improve our Website. By submitting information to us and asking us to disclose your information to certain third parties as set forth herein, you expressly agree to receive telephone calls and/or e-mails even if you are registered with any state Do Not Call Registry and/or the National Do Not Call List.

Analytics Companies.

We may work with third-party analytics companies that collect information anonymously and report website trends without identifying individual visitors. These services allow us to view a variety of reports about how visitors interact with the Services so we can improve our Services and understand how people find and navigate it.

HOW WE MAY USE YOUR INFORMATION

By providing Your Information, you agree that we may use Your Information for the purposes of providing our services (the “Services”), including, but not limited to, virtual careers fairs, employment fairs, trade fairs, and other virtual events throughout the United States and globally, to you. Our uses of Your Information may include (but are not necessarily limited to) the following:

- responding to comments, requests and questions and providing customer service;
- facilitating the creation of and securing your Account on our network;
- identifying you as a user in our system;
- providing, processing, and delivering the Services you request;
- improving the quality of experience when you interact with our Services, including the testing of different page designs to see which performs better;

- sending you administrative e-mail notifications, such as security or support and maintenance advisories;
- resolving disputes and/or troubleshooting problems; developing, improving, and delivering marketing and advertising for the Services;
- processing and delivering orders; and
- responding to your inquiries related to employment opportunities or other requests.

We may also create anonymous data records from personal information by excluding information (such as your name) that makes the data personally identifiable to you. We use this anonymous data to analyze request and usage patterns so that we may enhance the content of our Services and improve Site navigation. We reserve the right to use anonymous data for any purpose and disclose anonymous data to third parties in our sole discretion.

HOW WE MAY SHARE YOUR INFORMATION

By providing Your Information, you expressly authorize us to share it. In addition to information you are asked to complete upon registration, you may decide for yourself which additional information you wish to share: e.g., prospective employees or students may upload resumes or other information for distribution to employers or schools, and employers and schools create their own areas of the Website to display information that they wish to share with visitors. Website users may share information with one another in chat rooms. Vault Events may record or maintain transcripts of information shared through the Website, including, but not limited to, in chat rooms, for legal reasons, to improve its customer service, and to discourage abuse of the Website, but it is not obliged to collect or maintain such information. Vault Events may make transcripts and records of participants' Website use available to sponsoring or event hosting organizations and to participants themselves, but Vault Events will not make such information available to other parties except in aggregate numerical form that does not disclose personal information. Notwithstanding any other provision herein, we reserve the right to disclose your personally identifiable information as required by law and when we believe that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or legal process served on our website, or when we reasonably believe that our Terms of Service (found elsewhere on this Website and incorporated herein by this reference) have been breached. You agree to hold Vault Events harmless with respect to any information that you provide or upload to the Website (including resumes) and which is then shared with any other party, whether by Vault Events or by a third party, and whether or not you intended such party to receive Your Information. By using the Website, you understand and acknowledge that, pursuant to the Family Educational Rights and Privacy Act (FERPA) or other applicable federal or state law, you are providing your express consent to share certain Personal Information strictly according to the Vault Events Terms of Service and this Privacy Policy.

Corporate Restructuring.

We may share some or all of your personal information in connection with or during negotiation of any merger, financing, acquisition or dissolution transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets the event of insolvency, bankruptcy, or receivership, personal information may also be transferred as a business asset. If another company acquires our company, business, or assets, that company will possess the personal information collected by us and will assume the rights and obligations regarding Your Information as described in this Privacy Policy.

Other Disclosures.

Regardless of any choices you make regarding Your Information (as described below), Vault Events may disclose personal information if it believes in good faith that such disclosure is necessary: (i) in connection with any legal investigation; (ii) to comply with relevant laws or to respond to subpoenas or warrants served on Vault Events; (iii) to protect or defend the rights or property of Vault Events or users of the Services; and/or (iv) to investigate or assist in preventing any violation or potential violation of the law this Privacy Policy, or other rights of Vault Events found in law or in contract with you or third parties.

HOW WE COMMUNICATE WITH OUR CUSTOMERS

By registering for an account, you authorize Vault Events to send occasional newsletters, virtual fair invitations, marketing information, and other communications to you at the e-mail address you have provided. If you do not wish to receive such communication from Vault Events, you may UNSUBSCRIBE from our mailing list at any time by following the simple instructions located at the bottom of each mailing. If for some reason the unsubscribe function does not work on your device, please email fairs@vault.com . By signing up for an account and attending a virtual fair, you authorize us to share certain information as described above. Please rest assured that, except as described in this Privacy Policy, we never share your e-mail address or other personal information with others unless authorized by you to do so.

Changes to Personal Information.

You may change Your Information in your Account by editing your profile within your Account. You may request that we delete your personal information in your Account, but please note that we may be required to keep this information and not delete it (or to keep this information for a certain time, in which case we will comply with your deletion request only after we have fulfilled such requirements). When we delete any information, it will be deleted from the active database but may remain in our archives. We may also retain your information for fraud prevention or similar purposes. While we and others give you the choices to control the information collected and used as described in this Privacy Policy, there are many web browser signals and other similar mechanisms that can indicate your choice to disable tracking, and we may not be aware

of or be able to honor every mechanism.

Information Disclosed to Third Parties.

This Privacy Policy addresses only our use and disclosure of information we collect from and/or about you on the Services. If you disclose information to others or authorize us to do the same under this Privacy Policy, the use and disclosure restrictions contained in this Privacy Policy may not apply to every third party. We do not control the privacy policies of third parties, and you are subject to the privacy policies of those third parties where applicable.

HOW WE RESPOND TO “DO NOT TRACK” SIGNALS

We do not currently respond to “do not track” signals or other mechanisms that might enable consumers to opt out of tracking on our Services. For more information about “do not track” signals, you can visit <https://allaboutdnt.com>.

CHILDREN'S PRIVACY

We do not seek or willingly collect information on children under the age of 13. If we discover that a child under the age of 13 has signed up for an account, and we have collected information in connection with that account, we will terminate any such account at once and delete that information from our system.

PAYMENT INFORMATION

We do not collect any form of payment information on this site. If you request services that require payment, you will be directed to our third-party payment processor.

USERS OUTSIDE OF THE UNITED STATES

If you are a non-U.S. user of the Services, by using the Services and/or providing us with information, you acknowledge and agree that Your Information may be processed for the purposes identified in this Privacy Policy. In addition, Your Information may be processed in the country in which it was collected and in other the countries, including United States, where laws regarding processing of personal information may be less stringent than the laws in your country. By providing Your Information, you consent to such transfer. We do not currently intend to apply for the Privacy Shield Framework nor to comply with the GDPR. If you are a citizen of the EU and providing Services to you would bring us under the jurisdiction of any European country, you do not have permission to use the Services.

CONTACT INFORMATION

We welcome your comments or questions about this Privacy Policy. You may contact us at fairs@vault.com. Please contact us if you would like access to Your Information that we have collected. Please contact us if you would like us to stop collecting Your Information.