

# Privacy Policy

Effective date: July 22, 2019

Thank you for visiting the Strategic Data Systems, Inc. website. Strategic Data Systems, Inc ("us", "we", or "our") operates the [www.sdatasystems.com](http://www.sdatasystems.com) website (hereinafter referred to as the "Site").

Your privacy is important to us. We want to help you better understand how we collect, use, safeguard, and share your personal information. This Privacy Policy is designed to help you understand your privacy choices when you visit our Site or use our services. It does not apply to other websites that we do not control or other services that we may provide under contract. It informs you of our policies regarding the collection, use and disclosure of personal data when you use our Site and the choices you have associated with that data. We encourage you to read this Privacy Policy carefully and take the time to get to know our practices. If you have questions about this Policy or our privacy practices, please contact us at [privacy@sdatasystems.com](mailto:privacy@sdatasystems.com).

This Privacy Policy lists our current practices related to your personal information, but it may be adjusted from time to time at our discretion. We are a U.S.-based company, and your personal information will be processed by Strategic Data Systems, Inc. and its related third parties in the U.S. On rare occasions, our related third parties may be located in other countries

## Information Collection and Use

### Types of Data Collected

#### *Personal Information*

Strategic Data Systems, Inc. collects personal information which may include:

- First and last name, company name, email address, postal address, IP address, device ID and other data, phone number, user ID, password and password hints, and other security information used for authentication and account access
  - We use this information to provide you with our services, including identity confirmation, job applicant tracking, and indirect marketing.

Job applicant information provided during our job application process may include:

- Name, contact information, date of birth, social security number, device and internet connection information, education and work history, gender, race or ethnic origin, sexual orientation, disability and veteran status, criminal record (where permitted by law), and other relevant information.
  - We use this information for human resources services, including, but not limited to, staffing, benefit enrollment, records management, analyzing our recruiting process and outcomes, conducting academic and employment verification, background investigations (where permitted by law), security clearance investigations, and affirmative action planning and analysis.

We use the Internet Protocol (IP) addresses of computers that access our Site to help identify you, diagnose any problems with the Site, administer and improve our Site, and gather personal information related to the purposes specified above.

### **Tracking Cookies Data**

We may use cookies and similar tracking technologies to track the activity on our Service and we hold certain information.

Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies may be used such as beacons, tags and scripts to collect and track information and to improve and analyse our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we may use:

- **Session Cookies.** Session Cookies to operate our Service.
- **Preference Cookies.** Preference Cookies to remember your preferences and various settings.
- **Security Cookies.** Security Cookies for security purposes.

### **Use of Data**

Strategic Data Systems, Inc uses the collected data for various purposes:

In general, you can visit many of our web pages without telling us any more personal information than your device and IP address information. In certain occasions like a mailing list signup, we will ask for additional personal information and request your consent to process it for a specified purpose. Whether or not you provide such information is completely your own choice, but our services may be limited.

If we decide to use your personal information in a manner materially different from that stated in our Privacy Policy at the time that such information was collected, we will obtain your consent before any additional processing is begun. You agree that if we send such notice to your then-current e-mail address as reflected in our records, such notice will be sufficient. The notice will ask for your consent to use your personal information in a manner different from our original processing. If you do not consent, then we will not process your personal information beyond the purposes for which you have already consented.

### **Information Sharing**

Our services are possible because of a variety of third parties and service providers. Sometimes it is necessary to share personal information with them to support our services. We may also share your information in the following circumstances:

- To conduct background checks and other necessary pre-employment activities for job applicants
- To consider you for work opportunities on projects that we currently work or propose to work
- To process services which may benefit you as an employee such as providing employee benefits, employee travel assistance, employee expense report processing or compensation program analysis.
- To respond to lawful court orders, subpoenas, warrants, or other requests by public authorities, or as otherwise required by law.
- As part of a partial or total assignment of assets or other corporate change, including a potential merger, acquisition, sale, or other change of control.

We ask for your consent before sharing personal information with any third party. Your information may be disclosed to Strategic Data Systems, Inc. domestic subsidiaries. Your information may also be transferred to a third-party for the purposes of data back-up, consolidation, storage, and simplified customer management. As part of any data transmission, your information may be transferred across state and country borders. We will not share, sell, rent, or otherwise disclose personal information to other companies without your consent.

If we learn your personal information is not protected according to our contract, or is being processed beyond your consent, we will take reasonable steps to protect your information and/or cease its illegitimate processing.

## Information Protection

Although we take appropriate measures to safeguard against unauthorized disclosures of information, we cannot assure you that the personally identifiable information we collect will never be disclosed in a manner that is inconsistent with this Privacy Policy. We maintain administrative, technical, and physical security measures designed to provide reasonable protection for your personal information against unauthorized access, disclosure, alteration, loss, and misuse. These security measures include access controls, encryption, secure configurations, website certificates, firewalls, endpoint protection software, device sanitization measures, and network monitoring tools.

While we are dedicated to securing our Site and services, you are responsible for securing and maintaining the privacy of your password(s) and account information. We are not responsible for protecting personal information that you have shared with a third party, including using the same password at our Site and along with other sites.

## Legal Basis for Processing Personal Data under the General Data Protection Regulation (GDPR)

If you are from the European Economic Area (EEA), Strategic Data Systems, Inc legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

Strategic Data Systems, Inc may process your Personal Data because:

- We need to perform a contract with you

- You have given us permission to do so
- The processing is in our legitimate interests and it is not overridden by your rights
- To comply with the law

### **Retention of Data**

Strategic Data Systems, Inc will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes and enforce our legal agreements and policies.

Strategic Data Systems, Inc will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer periods.

### **Transfer of Data**

Your information, including Personal Data, may be transferred to - and maintained on - computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

If you are located outside United States and choose to provide information to us, please note that we transfer the data, including Personal Data, to United States and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Strategic Data Systems, Inc will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organisation or a country unless there are adequate controls in place including the security of your data and other personal information.

### **Disclosure of Data**

#### **Disclosure for Law Enforcement**

Under certain circumstances, Strategic Data Systems, Inc may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

#### **Legal Requirements**

Strategic Data Systems, Inc may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Strategic Data Systems, Inc
- To prevent or investigate possible wrongdoing in connection with the Service

- To protect the personal safety of users of the Service or the public
- To protect against legal liability

## Security of Data

The security of your data is important to us but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

## Our Policy on "Do Not Track" Signals under the California Online Protection Act (CalOPPA)

We do not support Do Not Track ("DNT"). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked.

You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

## Your Rights

We understand that you have rights over your personal information. We have designed our Site for you with reasonable steps to allow you to access, correct, amend, delete, port, or limit the use of your personal information. If you are unable to perform these actions yourself, please contact us to assist you.

Job applicants are able to update many types of collected personal information directly within your job application account. Please contact us at [HR@sdatasystems.com](mailto:HR@sdatasystems.com) if you are unable to access or otherwise change your personal information within your account. If you are concerned about other data collected, please contact us at [privacy@sdatasystems.com](mailto:privacy@sdatasystems.com).

We may periodically send our customers information regarding our job candidates, employees, products and services. If you have been receiving such information and do not wish to continue receiving such information, you may opt-out of receiving these communications by replying to unsubscribe in the subject line in the email, emailing us at [privacy@sdatasystems.com](mailto:privacy@sdatasystems.com).

## Your Data Protection Rights under the General Data Protection Regulation (GDPR)

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. Strategic Data Systems, Inc aims to take reasonable steps to allow you to correct, amend, delete or limit the use of your Personal Data.

If you wish to be informed about what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

**The right to access, update or delete the information we have on you.**

Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.

**The right of rectification.** You have the right to have your information rectified if that information is inaccurate or incomplete.

**The right to object.** You have the right to object to our processing of your Personal Data.

**The right of restriction.** You have the right to request that we restrict the processing of your personal information.

**The right to data portability.** You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.

**The right to withdraw consent.** You also have the right to withdraw your consent at any time where Strategic Data Systems, Inc relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

## Service Providers

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), provide the Service on our behalf, perform Service-related services or assist us in analysing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

## Analytics

We may use third-party Service Providers to monitor and analyse the use of our Service.

### Google Analytics

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualise and personalise the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <https://policies.google.com/privacy?hl=en>

**Piwik / Matomo**

Piwik or Matomo is a web analytics service. You can visit their Privacy Policy page here: <https://matomo.org/privacy-policy>

**Clicky**

Clicky is a web analytics service. Read the Privacy Policy for Clicky here:

<https://clicky.com/terms>

**Statcounter**

Statcounter is a web traffic analysis tool. You can read the Privacy Policy for Statcounter here: <https://statcounter.com/about/legal/>

**Mixpanel**

Mixpanel is provided by Mixpanel Inc.

You can prevent Mixpanel from using your information for analytics purposes by opting-out. To opt-out of Mixpanel service, please visit this page:

<https://mixpanel.com/optout/>

For more information on what type of information Mixpanel collects, please visit the Terms of Use page of Mixpanel: <https://mixpanel.com/terms/>

**Links to Other Sites**

The Site may contain links to other services and websites that are not operated by us and outside of our control. For example, the page of the Site devoted to employee benefits offered contains links to third party providers and websites maintained by those providers. Please be aware that we are not responsible for the privacy practices of such third parties. We strongly advise you to review the privacy policy of each website you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

**Children's Privacy**

Our Service does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers. If you have questions about your personal information's collection, use, or sharing, or would like to make a complaint, please email us at [privacy@sdatasystems.com](mailto:privacy@sdatasystems.com).

**Changes to This Privacy Policy**

We reserve the right to modify this Privacy Policy from time to time. If we decide to change this Privacy Policy, we will post any such changes on the Site where the Privacy Policy is located so you will always be aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. We will also email those users who have given us sufficient personal information to contact them regarding changes to our

Privacy Policy. Your continued use of the Site following the posting of changes to this Privacy Policy means that you accept the changes to the policy. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

### **Contact Us**

If you have any questions about this Privacy Policy or if you believe your personal information has been used in a way that is not consistent with this Privacy Policy, please contact us by email at [privacy@sdatasystems.com](mailto:privacy@sdatasystems.com) or regular mail at the following postal address: Strategic Data Systems, Inc. Attn: Director, Operations, 1854 Keller Parkway, Suite A, Keller, Texas, 76248.