

APPLICANT HARBOR PRIVACY POLICY

(Effective Date: September 11, 2018)

Lighthouse Compliance Solutions (“Lighthouse”) respects your privacy and is committed to protecting it. Lighthouse does not disclose your information to any third parties except as described below. This Privacy Policy (Policy) explains how we collect, share, and use the personal information you provide on our Applicant Harbor platform. Our Applicant Harbor platform is designed to provide users with individual and aggregated applicant data for human resources and compliance purposes.

WHAT INFORMATION DO WE COLLECT?

Lighthouse may collect Personal Information from and about your applicants through your interaction with our Applicant Harbor platform. For the purposes of this policy we collect the following **Personal Information**:

- username and access time stamp;
- pages you visit;
- search filters and results;
- applicant name;
- contact information or details;
- company name;
- veteran service information and status;
- disability information and status;
- type of web browser used;
- operating system;
- interview notes;
- employment history and/or resume;
- electronic signatures (IP address, session token); and
- other information you upload or provide to us.

HOW DO WE USE YOUR INFORMATION?

To Provide Products and Service:

Lighthouse uses the personal information it collects and you supply:

- to provide, operate, optimize, maintain, support and manage our products and services;
- to address client questions and support requests;
- to manage Lighthouse’s platform, system administration and security;
- to compile aggregated statistics about the operation and use Lighthouse’s platform and to better understand the preferences of our clients;
- to send clients technical alerts, reports, updates, security notifications and other products and services-related communications;

- to carry out research and development to improve our products and services;
- to investigate and prevent fraud, unauthorized access or use of our products and services, breaches of terms and policies, and other wrongful behavior; and
- to carry out other legitimate business purposes, as well as other lawful purposes;

Cookies, Scripts, and Related Technologies:

When you access our Applicant Harbor platform, we use “cookies”—small files that the site places on your hard drive for identification purposes. A cookie file can contain information such as a user ID to track the pages visited, but the only personal information a cookie can contain is information you supply yourself. These files are used for site registration and customization the next time you visit us.

Some parts of the site may also use cookies to track user traffic patterns. Lighthouse does this in order to determine the usefulness of our website information to our users and to see how effective our navigational structure is in helping users reach that information. Please note that cookies cannot read data off of your hard drive. Your web browser may allow you to be notified when you are receiving a cookie, giving you the choice to accept it or not. If you prefer not to receive cookies while browsing our website, you can set your browser to warn you before accepting cookies and refuse the cookie when your browser alerts you to its presence. You can also refuse all cookies by turning them off in your browser, by not accepting cookies, some pages may not fully function and you may not be able to access certain information on this site.

Disclosing or Sharing Your Personal Information

The Personal Information you provide is never shared outside of Lighthouse without your permission, except under conditions listed below:

- Consenting to share the information provided to a third party service provider working on our behalf to provide services to you.
- Required by us to provide you with a product or service.

Lighthouse will also disclose the Personal Information you provide if required to do so by law, or in urgent circumstances, to protect personal safety, the public, or our platforms. We do not sell or otherwise disclose Personal Information we process in Applicant Harbor. We take no responsibility and cannot guarantee that you, our Client, will not use, sell, or disclose this Personnel Information in a manner not consistent with this policy through your access of the Applicant Harbor service.

Client Use and Disclosure

Our Clients may also choose to link their Applicant Harbor accounts with other third party service providers, which Lighthouse has no control over. We have no control over, do not review, and are not responsible for these third party websites, their content, or their collection methods. Please be aware that this Policy does not apply to these outside websites, and we encourage you to learn about the privacy policies of those companies.

Lighthouse asks that Clients exercise and take the same data security precautions it does with regard to all Personal Information provided through its Applicant Harbor platform. Lighthouse is not responsible for the disclosure, misuse, or any unauthorized access or breach of Personal Information due to a Client's use or misuse of the Application Harbor platform. Lighthouse's data security measures are meant to protect the Personal Information you provide to Lighthouse, but cannot prevent the misuse or inadvertent disclosure due to Client access and use. It is the responsibility of the client accessing Applicant Harbor to safeguard all Personal Information and data when using and accessing Applicant Harbor.

Data Security Practices

We care about the security of your Personal Information, and take appropriate steps including technical and organizational measures to ensure that the Personal Information you provide is treated securely and in accordance with this Policy. The measures we use are designed to provide the highest level of security of processing your Personal Information.

Should we discover a breach of our security system or an unauthorized disclosure of your Personal Information, we will provide notice to you in the most expedient manner possible following any such breach or unauthorized disclosure. We urge you to take every precaution to protect your personal data when you are on the Internet. Change your passwords often and use a combination of letters, numbers, and/or special characters.

Retention of Your Personal Information

We retain Personal Information we collect from you where we have an ongoing legitimate business need to do so. When we have no ongoing legitimate business need to process your Personal Information, we will either delete or anonymize it or, if this is not possible we will securely store your Personal Information and isolate it from any further processing until deletion is possible.

Any Personal Information we process on behalf of our clients is retained in accordance with the timeframes set out in the relevant customer agreements. Clients will have the option to purge their records and Personal Information records every three years or on a basis requested by the Client. This policy in no way covers the use or retention of your Personal Information when accessed by our Clients.

Controlling Your Information

You can control the client and applicant information we have about you and your applicants if you are a registered user of Applicant Harbor. You can review, revise, and correct the personal data that you have provided via your account in our system.

Opt Out

If you wish to opt-out or unsubscribe from our communications, there is an unsubscribe option in those emails. You can also email us at support@lightbeacon.com with a specific request to be removed from our email distribution list. Please understand that Lighthouse will still contact you in connection with legitimate business concerns/needs if you are using our Applicant Harbor platform.

Personal Data About Children

Children under 13 years old are not the target audience for Applicant Harbor. To protect their privacy, Lighthouse does not solicit the personal information of these children and will delete any information as quickly as possible.

HOW WILL YOU KNOW IF THE PRIVACY POLICY IS CHANGED?

Lighthouse may update its Policy from time to time. If we make any material changes we will notify you by email to the email associated with your user account, or by means of a notice on the Lighthouse website or Applicant Harbor portal prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

CONTACT INFORMATION

If you have questions about our Privacy Policy, contact us at support@lightbeacon.com or by mail: 500 President Clinton Ave, Suite 200, Little Rock, AR 72201.