

# WorkMarket Consumer Privacy Statement

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This Consumer Privacy Statement explains how WorkMarket, Inc. (an ADP company), its affiliates, and the WorkMarket product and platform (hereinafter "**WorkMarket**", "**our**", or "**we**") use and disclose Personal Data that is collected through WorkMarket, which includes all webpages associated with WorkMarket, landing pages within the WorkMarket mobile application, all application programming interfaces (APIs), file transfers and csv uploads, and all applications and communication tools provided by WorkMarket when you interact with WorkMarket as a consumer or website user.

<p><b>I am a consumer of a WorkMarket Product or Service</b></p>	<p><a href="#">Consumer Privacy Statement - Click here</a></p>	<p>This Privacy Statement explains how we use and disclose Personal Data that we collect from individuals who engage with us as direct consumers of a WorkMarket product or service. This statement does not apply when WorkMarket is acting in its capacity as a service provider to an individual's employer.</p>
<p><b>I am a business contact of a WorkMarket Product or Service</b></p>	<p><a href="#">Privacy Statement for Business Contacts - Click here</a></p>	<p>This Privacy Statement explains how we use and disclose Personal Data that we collect from individuals who visit our websites and otherwise engage with us in business activities, where WorkMarket acts as a controller.</p>
<p><b>I am an employee of a client that uses WorkMarket Products or Services</b></p>	<p><a href="#">Privacy Statement for Client Employees - Click here</a></p>	<p>This Privacy Statement explains WorkMarket practices with regard to the Personal Data that we receive from our clients where WorkMarket acts as a processor.</p>

WorkMarket, Inc. is a subsidiary of Automatic Data Processing Inc., which, together with all of its consolidated subsidiaries (collectively, "**ADP**"), has a Global Data Privacy Policy that applies to all ADP companies worldwide, including, without limitation, WorkMarket. An overview of the ADP Privacy Program is located at [www.adp.com/dataprivacy](http://www.adp.com/dataprivacy).

## WorkMarket Consumer Privacy Statement

This Privacy Statement explains how WorkMarket uses and discloses Personal Data that we collect from individuals who engage with us as direct consumers of our products or services. Personal Data is any information that identifies you as an individual or relates to an identifiable individual.

## 1. Types of Personal Data

This Privacy Statement explains our practices regarding Personal Data collected by WorkMarket for the purposes of this offering, product, or service.

Some examples of Personal Data collected or accessed with your permission when you use WorkMarket include your name, username, address, location data, email address, telephone number, user profile information, worker type, employment information, demographic data, financial and tax information, compensation information, benefits information, or other information about how you engage with the offering.

## 2. How WorkMarket Collects Personal Data & Categories of Personal Data Collected

With your permission we will obtain Personal Data about you directly from you or clients or companies for which you provide services (e.g., contract or freelance services), third-party service providers, third-party data suppliers and publicly available databases. We will ask you for Personal Data when you interact with us, such as when you register on WorkMarket, set up an account, sign up to receive marketing communications, or request our services or the ability to use and access our platform.

WorkMarket collects the following categories of Personal Data directly from you when you choose to share them with us: name, Social Security Number (SSN) or US Tax Identification Number (TIN), Canadian tax information like Social Insurance Number (SIN) (for Canada-based WorkMarket users), foreign tax identifying number (on IRS Form W-8BEN), address, tax location, business name and information, worker type, financial and bank account information, information around work assignments performed, work history, compensation information, location and geo-tracking data, government IDs (such as a driver's license or passport), photos, email address, password, login, skills and qualifications, interests, and IP address.

We need to collect Personal Data to provide the requested services to you. If you do not provide the information requested, we may not be able to provide the services. If you disclose any Personal Data relating to other people to us or to our service providers in connection with WorkMarket, you represent that you have the authority to do so and to permit us to use the Personal Data in accordance with this Privacy Statement.

If you engage with us we use cookies and other online tracking technologies to collect data about your device and your use of WorkMarket.

For more information about cookies and other online tracking technologies, please see the section **"Cookies and Other Automatic Data Collection Technologies"** below.

## 3. How WorkMarket uses Personal Data

WorkMarket is an offering on WorkMarket mobile and web properties that allows independent contractors who provide services and companies seeking services to interact and arrange for an independent contractor to complete a work assignment for a company. WorkMarket uses Personal Data to customize and provide the services, which may include: the creation of consumer accounts on the platform; managing payments, invoicing, tax reporting, customer service, and account management support; facilitating the

ordering of background checks and/or drug tests when requested; and providing other services related to your relationship with WorkMarket.

We also use your Personal Data for the following business purposes:

**(a) Business Purposes for processing Personal Data pertaining to consumers.** Personal Data pertaining to consumers with whom WorkMarket has a business relationship is processed as needed, for example:

- (1)** To provide the information, product, or service requested by the individual, and as would be reasonably expected by the individual given the context in which the Personal Data was collected, and the information provided in the applicable privacy statement given to the individual (such as for personalization, remembering preferences, or respecting individual rights);
- (2)** For due diligence, including verifying the identity of the individual, as well as the eligibility of the individual to receive information, products, or services (such as verifying age, employment, account status, authority, and sanctions list status);
- (3)** To send transactional or administrative communications (such as requests for information, responses to requests for information, transaction or assignment details, orders, confirmations, training materials, and service updates);
- (4)** To manage the individual's account, such as for customer service, finance, reporting, and dispute resolution purposes;
- (5)** For risk management and mitigation, including for audit and insurance functions, and as needed to license and protect intellectual property and other assets;
- (6)** For security management, including monitoring individuals with access to the website, applications, systems, or facilities; investigation of threats, and as needed for any data security breach notification; and
- (7)** To anonymize or de-identify the Personal Data. Where we maintain or use de-identified data, we will continue to maintain and use such data only in a de-identified fashion and will not attempt to re-identify such data.

We engage in these activities to manage our contractual relationship with you, to comply with a legal obligation, and/or based on our legitimate interest.

**(b) Business-necessary processing activities.** We process Personal Data as needed (i) to protect the privacy and security of the Personal Data it maintains, such as in connection with advanced security initiatives and threat detection; (ii) for treasury operations and money movement activities; (iii) for compliance functions, including screening individuals against sanction lists in connection with anti-money laundering programs; (iv) for business structuring activities, including mergers, acquisitions, and divestitures; and (v) for business activities, management reporting, and analysis.

We engage in these activities to manage our contractual relationship with you, to comply with a legal obligation, and/or based on our legitimate interest.



**(c) Development and improvement of products and/or services.** We process Personal Data to develop and improve products and/or services, and for research, development, analytics, and business intelligence.

We engage in these activities based on our legitimate interest.

**(d) Relationship management and marketing.** We process Personal Data for relationship management, marketing, and to provide personalized services. This purpose includes sending marketing and promotional communications to individuals who have not objected to receiving such messages, such as product and service marketing communications, investor communications, customer satisfaction surveys, and WorkMarket news.

We will engage in these activities based on our legitimate interests, and with your consent to the extent required by applicable law.

**(e) Operational purposes.** Additionally, we use your Personal Data for purposes such as: (i) disaster recovery and business continuity; (ii) internal audits or investigations; (iii) implementation or verification of business controls; (iv) statistical, historical, or scientific research; (v) dispute resolution; (vi) legal or business counseling; (vii) compliance with laws and company policies; and/or (viii) insurance purposes.

We engage in these activities to manage our contractual relationship with you, to comply with a legal obligation, and/or based on our legitimate interest.

## **4. Why and How Personal Data is disclosed by WorkMarket**

We disclose your Personal Data to:

- ADP Group Companies, which use your Personal Data for the purposes listed in this Privacy Statement;
- Companies and clients that are also using WorkMarket;
- Our service providers, to facilitate services they provide to us. These can include providers of such services as website and application hosting, data analysis, payment processing, order fulfillment, fraud prevention, information technology and related infrastructure provision, customer service, email delivery, and auditing;
- Third-party service providers from whom you have elected to receive additional services, such as background checks, drug tests, or insurance;
- Uses necessary to enforce our rights, protect our property, protect the rights, property or safety of others, in connection with any proposed or actual reorganization, bankruptcy, merger, sale, joint venture, assignment, transfer of WorkMarket, or other disposition of all or any portion of WorkMarket business or assets, or as needed to support external auditing, compliance and corporate governance functions;
- Third parties, including law enforcement agencies when required and to protect and defend our legal rights, protect the safety and security of users of our services, prevent fraud,

respond to legal process (e.g. subpoena or court order), or a request for cooperation by a government entity, including as required by law.

## 5. Additional US State Specific Privacy Disclosure

The following details the categories of Personal Data we collect and process, which categories of third parties may have access to your Personal Data for operational business purposes, as well as which categories of Personal Data we “share” for purposes of cross-context behavioral or targeted advertising, including within the 12 months preceding the date this Privacy Statement was last updated.

Categories of Personal Data	Disclosed to Which Categories of Third Parties for Operational Business Purposes (see below for a more detailed description of these categories)	Processing Purposes (See section 3 How WorkMarket uses your data for complete list)	Shared with Which Categories of Third Parties for Cross-Context Behavioral or Targeted Advertising
<b>Identifiers</b> , such as name, contact information, unique personal identifiers, email address, IP address, online identifiers, government-issued identifiers.	Service Providers/Subcontractors/ Clients, Related Entities, Law enforcement/Legal authorities, Third Parties in the event of a Corporate Transaction, with your consent.	(a)(1), (a)(2), (a)(3), (a)(4), (a)(5), (a)(6), (a)(7), (b), (c), (d), and (e)	Ad networks.
<b>Personal information as defined in the California customer records law</b> , such as name, contact information, financial, education, employment information.	Service Providers/Subcontractors/ Clients, Related Entities, Law enforcement/Legal authorities, Third Parties in the event of a Corporate Transaction, with your consent.	(a)(1), (a)(2), (a)(3), (a)(4), (a)(5), (a)(6), (a)(7), (b), (c), (d), and (e)	None.
<b>Characteristics of protected classifications under California or federal law</b> , such as race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, marital status, sex, gender expression, gender identify, age, sexual orientation, military or veteran status.	Not Applicable.	Not Applicable.	Not Applicable.

<b>Categories of Personal Data</b>	<b>Disclosed to Which Categories of Third Parties for Operational Business Purposes</b> (see below for a more detailed description of these categories)	<b>Processing Purposes</b> (See section 3 How WorkMarket uses your data for complete list)	<b>Shared with Which Categories of Third Parties for Cross-Context Behavioral or Targeted Advertising</b>
<b>Identifiers</b> , such as name, contact information, unique personal identifiers, email address, IP address, online identifiers, government-issued identifiers.	Service Providers/Subcontractors/ Clients, Related Entities, Law enforcement/Legal authorities, Third Parties in the event of a Corporate Transaction, Third Parties With Your Consent.	(a)(1), (a)(2), (a)(3), (a)(4), (a)(5), (a)(6), (a)(7), (b), (c), (d), and (e)	Ad networks.
<b>Personal information as defined in the California customer records law</b> , such as name, contact information, financial, education, employment information.	Service Providers/Subcontractors/ Clients, Related Entities, Law enforcement/Legal authorities, Third Parties in the event of a Corporate Transaction, Third Parties With Your Consent.	(a)(1), (a)(2), (a)(3), (a)(4), (a)(5), (a)(6), (a)(7), (b), (c), (d), and (e)	None.
<b>Characteristics of protected classifications under California or federal law</b> , such as race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, marital status, sex, gender expression, gender identify, age, sexual orientation, military or veteran status.	Not Applicable.	Not Applicable.	Not Applicable.
<b>Commercial Information</b> , such as transaction information and purchase history.	Service Providers/Subcontractors/ Clients, Related Entities, Law enforcement/Legal authorities, Third Parties in the event of a Corporate Transaction, Third Parties With Your Consent.	(a)(1), (a)(2), (a)(3), (a)(4), (a)(5), (a)(6), (a)(7), (b), (c), (d), and (e)	None.
<b>Biometric Information</b> , such as fingerprints, voiceprints and faceprints.	Not Applicable.	Not Applicable.	None.

<b>Categories of Personal Data</b>	<b>Disclosed to Which Categories of Third Parties for Operational Business Purposes</b> (see below for a more detailed description of these categories)	<b>Processing Purposes</b> (See section 3 How WorkMarket uses your data for complete list)	<b>Shared with Which Categories of Third Parties for Cross-Context Behavioral or Targeted Advertising</b>
<b>Internet or network activity information</b> , such as IP address, mobile device ids, MAC address.	Service Providers/Subcontractors/ Clients, Related Entities, Law enforcement/Legal authorities, Third Parties in the event of a Corporate Transaction, Third Parties With Your Consent.	(a)(1), (a)(2), (a)(5), (a)(6), (a)(7), (b), (c), (d), and (e)	Ad networks.
<b>Geolocation Data</b> , such as precise location/tracking data and coarse location/tracking data.	Service Providers/Subcontractors/ Clients, Related Entities, Law enforcement/Legal authorities, Third Parties in the event of a Corporate Transaction, with your consent.	(a)(1), (a)(4), (b), (c), and (e)	None.
<b>Audio/Video Data</b> , such as photographs.	Service Providers/Subcontractors/ Clients, Related Entities, Law enforcement/Legal authorities, Third Parties in the event of a Corporate Transaction, Third Parties With Your Consent.	(a)(1), (a)(2), (a)(4), (a)(5), (b), and (e)	None.
<b>Education Information</b> subject to the federal Family Educational Rights and Privacy Act such as education and training history, education degrees, qualifications and certifications.	Service Providers/Subcontractors/ Clients, Related Entities, Law enforcement/Legal authorities, Third Parties in the event of a Corporate Transaction, Third Parties With Your Consent.	(a)(1), (a)(7), (b), (c), (d), and (e)	None.

<b>Categories of Personal Data</b>	<b>Disclosed to Which Categories of Third Parties for Operational Business Purposes</b> (see below for a more detailed description of these categories)	<b>Processing Purposes</b> (See section 3 How WorkMarket uses your data for complete list)	<b>Shared with Which Categories of Third Parties for Cross-Context Behavioral or Targeted Advertising</b>
<b>Employment Information.</b> Professional or employment-related information, such as work history and prior employer, worker type, background checks, drug tests, performance rating or feedback, employer, occupation title/job role, compensation information, skills, qualifications and interests.	Service Providers/Subcontractors/ Clients, Related Entities, Law enforcement/Legal authorities, Third Parties in the event of a Corporate Transaction, Third Parties With Your Consent.	(a)(1), (a)(2) (a)(3), (a)(4), (a)(5), (a)(7), (b), (c), and (e)	None.
<b>Inferences</b> such as any assumptions drawn from any of the Personal Data listed above to create a profile about, for example, an individual's preferences or characteristics.	Not Applicable.	Not Applicable.	None.
<b>Sensitive Personal Information,</b> such as social security, U.S. or foreign tax identification, driver's license, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; citizenship; union membership; criminal history.	Service Providers/Subcontractors/ Clients, Related Entities, Law enforcement/Legal authorities, Third Parties in the event of a Corporate Transaction, Third Parties With Your Consent.	(a)(1), (a)(2), (a)(4), (a)(5), (a)(6), (a)(7), (b), and (e)	None.



### **Opt-out of Targeted Advertising / "Sharing" of Personal Data**

To request to opt out of any future targeted advertising, including the sharing of your Personal Data for purposes of cross-context behavioral advertising, please go to [www.workmarket.com](http://www.workmarket.com) and click the [Cookie Preferences – Do Not Share My Data](#) link at the bottom of the page to turn off advertising cookies.

### **Detailed Description of Categories of Third Parties**

Third Parties to which we may disclose your Personal Data are as follows:

- (a) Service Providers/Subcontractors/Clients** We may share your Personal Data with our service providers/subcontractors for certain business purposes. This information is provided in order for them to provide us with services such as payment processing, advertising services, marketing partners, web analytics, data processing, IT services, customer support, and other services such as for the purpose of auditing and fraud investigations. We may share your Personal Data with third-party service providers who you elect to have provide additional services on your behalf, such as background checks, drug testing, and/or insurance. We may also share your Personal Data with other clients or users of the WorkMarket platform.
- (b) Related Entities** We may share Personal Data between and among WorkMarket, its subsidiaries, and affiliated companies for purposes of management and analysis, and other business purposes. For instance, we may share your Personal Data with our affiliated companies to expand and promote our product and service offerings.
- (c) Law Enforcement/Legal Authorities** We may be required to disclose your Personal Data to third parties including law enforcement agencies when required and to protect and defend our legal rights, protect the safety and security of users of our services, prevent fraud, respond to legal process (e.g. subpoena or court order), or a request for cooperation by a government entity, including as required by law.
- (d) Corporate Transactions** In the event of sale, transfer, merger, reorganization, or similar event, we may transfer your Personal Data to one or more third parties as part of that transaction with the business entities or people involved in the deal negotiation or transfer.
- (e) Third Party With Your Consent** We may share Personal Data about you with other third-party companies if you give us permission or direct us to share the data. We will share Personal Data with authorized agents that you authorize WorkMarket to communicate to.

**We do not sell and have not sold Personal Data, including your Sensitive Personal Data, in the preceding 12 months.**

### **Sources of Personal Data**

We collect this Personal Data actively (e.g. direct input from individuals) or passively (e.g., website cookies) from you. Additionally, we may also collect Personal Data from third-party sources, such as our affiliates, business partners, service providers, and clients.

## 6. Cookies and Other Automatic Data Collection Technologies

When you visit our website or use our mobile applications, we collect certain information by automated means, using technologies such as cookies, pixel tags, browser analysis tools, server logs, and web beacons. For example, when you visit our website, we place cookies on your computer. Cookies are small text files that websites send to your computer or other Internet-connected device to uniquely identify your browser or to store information or settings in your browser. Cookies allow us to recognize you when you return. They also help us provide a customized experience and enable us to detect certain kinds of fraud. In many cases, you can manage cookie preferences and opt-out of having cookies and other data collection technologies used by adjusting the settings on your browser. All browsers are different, so visit the “help” section of your browser to learn about cookie preferences and other privacy settings that may be available.

Pixel tags and web beacons are tiny graphic images placed on website pages or in our emails that allow us to determine whether you have performed a specific action. When you access these pages or open or click an email, the pixel tags and web beacons generate a notice of that action. These tools allow us to measure response to our communications and improve our web pages and promotions.

**Automatically Collected Data.** We collect many different types of data from cookies, pixel, tags, web beacons, and other online tracking technologies such as browser analysis tools. For example, we collect data from the device you use to access our website, such as your operating system type, browser type, domain, and other system settings, as well as the language your system uses and the country and time zone where your device is located. Our server logs also record the Internet Protocol (IP) address assigned to the device you use to connect to the Internet. An IP address is a unique number that devices use to identify and communicate with each other on the Internet. We may also collect data about the website you were visiting before you came to WorkMarket and the website you visit after you leave our site.

In many cases, the data we automatically collect using cookies and other online tracking technologies is only used in a non-identifiable way, without reference to Personal Data. For example, we use data we collect about website users to optimize our websites and to understand website traffic patterns. In some cases, we do associate the information we automatically collect using cookies and other online tracking technologies with your Personal Data. This Privacy Statement applies to such automatically collected data when we associate it with your Personal Data.

**Do Not Track.** Although our website currently does not have a mechanism to recognize the various web browser Do Not Track signals, we do offer consumers choices to manage their preferences that are provided in sections 19 and 20 below. To learn more about browser tracking signals and Do Not Track please visit <http://www.allaboutdnt.org/>.

**YouTube Videos.** Our website may include embedded YouTube videos. When you click on an embedded YouTube video that video is loaded from a domain operated by YouTube. Although we have enabled the Privacy-Enhanced mode for embedded YouTube videos, which prevents YouTube from placing tracking cookies on your device when viewing these videos on our site, YouTube may collect your IP address and other devices information for their own purposes. To learn more about YouTube’s Privacy-Enhanced mode visit the YouTube support page at <https://support.google.com/youtube/answer/171780?hl=en->

GB&ref=axbom.com#. To learn more about YouTube's processing of IP addresses visit YouTube's privacy policy at <https://policies.google.com/privacy?sjid=60584270626491410-NA>.

## 7. Third-Party Advertising

We use third-party advertising companies to serve advertisements regarding goods and services that may be of interest to you when you access and use WorkMarket and other websites or online services. You may receive advertisements based on information relating to your access to and use of WorkMarket and other websites or online services on any of your devices, as well as on information received from third parties. These companies place or recognize a unique cookie on your browser (including through the use of pixel tags). They also use these technologies, along with information they collect about your online use, to recognize you across the devices you use, such as a mobile phone and a laptop.

If you would like more information about this practice, and to learn how to opt out of it in desktop and mobile browsers on the particular device on which you are accessing this Privacy Statement, please visit <http://optout.aboutads.info/#/> and <http://optout.networkadvertising.org/#/>. You may download the AppChoices app at [www.aboutads.info/appchoices](http://www.aboutads.info/appchoices) to opt out in mobile apps.

We also process opt-out preference signals, such as the Global Privacy Control (GPC). The GPC is a mechanism that enables consumers to automatically communicate their privacy preferences to opt-out of sale and sharing of their personal information to this website. This ensures that the consumer's opt-out preference is honored through compatible browsers or extensions that support GPC, consistently across all websites accessed through the browser or device you are using. Go to your browser's setting to enable GPC. If enabled you will receive notification or see a visual indication (e.g., banner or pop-up message) on our site confirming that your GPC signal has been detected and your opt-out request has been processed. For information about how to use the Global Privacy Control, please visit <https://globalprivacycontrol.org/>.

## 8. Third-Party Analytics

WorkMarket uses third-party analytics providers, such as Google Analytics. This service uses cookies and similar technologies to collect and analyze information about the use of WorkMarket and report on activities and trends. These services may also collect information regarding the use of other websites, apps and online resources. You can learn about Google's practices by going to [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/) and exercise the opt-out provided by Google by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

## 9. reCAPTCHA

We use Google's visible and invisible reCAPTCHA applications in order to protect against spam and other automated abuse. The reCAPTCHA tool may make use of cookies, as well as other information like IP address, date, time, language, screen size and resolution, and mouse movements, while on the page. The use of the reCAPTCHA service and the treatment of any information collected through the service are subject to Google's applicable privacy policy, available at <https://policies.google.com/privacy>, and Google's terms of service, available at <https://policies.google.com/terms?hl=en>.

## 10. Physical Location and Maps

We may collect the physical location of your device by, for example, using satellite, cell phone tower or WiFi signals. We may use your device's physical location to provide you with personalized location-based services and content. We may also share your device's physical location, combined with information about the advertisements you viewed and other information we collect, with our marketing partners to enable them to provide you with more personalized content and to study the effectiveness of advertising campaigns. When you enable, or grant permission to use, the GPS/geo-location feature of WorkMarket through your mobile device, we may access and process your location data to provide your location data information to actual or potential clients and other users of the platform, find work near you on the public marketplace, and/or check you in and out of a work assignment. In some instances, you may be permitted to allow or deny such uses and/or sharing of your device's location, but if you do, we and/or our marketing partners may not be able to provide you with the applicable personalized services and content. Additionally, if you turn off the GPS/geo-location feature of the WorkMarket platform through your mobile device, it may impact the functionality of the WorkMarket platform and all features may not be available to you.

WorkMarket also uses Google Maps and related APIs as a third-party vendor. By using Google Maps, end users are subject to the Google's applicable policies, including [https://www.google.com/intl/en-US\\_US/help/terms\\_maps/](https://www.google.com/intl/en-US_US/help/terms_maps/) and <https://policies.google.com/privacy>.

## 11. Mobile Applications

WorkMarket is part of a mobile application that allows you to access your profile, interact with us and clients online, and receive other information via your mobile device. When you download and use our application, we and our service providers may track and collect usage data, such as the date and time the application on your device accesses our servers and what information and files have been downloaded to the application based on your device number. We use this information to understand how the application is used and improve it.

## 12. Information Security

WorkMarket is committed to maintaining the appropriate organizational, technical, and physical controls designed to protect Personal Data entrusted to us from anticipated threats and hazards and unauthorized access and use. WorkMarket will strive to provide security that is proportional to the sensitivity of the Personal Data being protected. Additional information about our Global Security Organization may be found at <http://www.adp.com/trust>.

## 13. Data Retention

We retain Personal Data for as long as needed or permitted in light of the purpose(s) for which it was collected. The criteria used to determine our retention periods include:

- (a) The length of time we have an ongoing relationship with you and provide services to you (for example, for as long as you have an account with us or keep using our services) and the length of time thereafter during which we may have a legitimate need to reference your Personal Data to address issues that may arise;

- (b) Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); or
- (c) Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

## **14. International Data Transfers**

WorkMarket is headquartered in the United States of America. Your Personal Data may be accessed by or transferred to our Group Companies and Suppliers outside your country of residence, including to the United States or elsewhere in the world in accordance with our Privacy Code for Business Data. These countries may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those countries may be entitled to access your Personal Data.

## **15. Third Party Services**

This Privacy Statement only addresses the use and disclosure of Personal Data by WorkMarket. This Privacy Statement does not address, and we are not responsible for, the privacy, data, or other practices of any third parties, including any third party operating a website, app, or service to which WorkMarket links. This inclusion of a link does not imply our endorsement of the linked site or services. Our suppliers, business partners, and other third-party websites that may be accessible through WorkMarket have their own privacy statements and data collection, use and disclosure practices. We encourage you to familiarize yourself with the privacy statements provided by third parties prior to providing them with information.

WorkMarket may provide functionality allowing you to make or receive payments using a third-party payment service with which you have created your own account. When you use such a service to make or receive a payment, your Personal Data will be collected by such third party and not by us and will be subject to the third party's privacy policy, rather than this Privacy Statement. We have no control over, and are not responsible for, any such third party's collection, use or disclosure of your Personal Data.

## **16. Use by Minors**

WorkMarket is not directed to individuals under the age of 18 and we do not knowingly collect Personal Data from individuals under 18. We do not sell or knowingly "share" (for cross-context behavioral advertising purposes) the Personal Data, including the Sensitive Personal Data, of minors under 18 years of age.

## **17. Sensitive Data**

Subject to your consent where required by applicable law, we collect, use, and disclose Sensitive Personal Data for purposes of performing services for our business, providing goods or services as requested by you, ensuring safety, security and integrity, short term transient use such as displaying first party, non-personalized advertising, servicing accounts, providing customer service, verifying customer information, processing payments, providing analytic services, providing storage, activities relating to quality or product improvement, and other collection and use that is not for the purpose of inferring characteristics about an individual. We do not use Sensitive Personal Data beyond these purposes.

Unless we request it, we ask that you not send us, and you not disclose, any Sensitive Personal Data (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics or criminal background) on or through the WorkMarket or otherwise to us.

## 18. Automated Decision Making

In some instances, WorkMarket's use of your Personal Data may result in automated decisions being taken. Automated decisions mean that a decision concerning you is made automatically on the basis of a computer determination (using software algorithms), without human review. For example, we may use your Personal Data to match you with companies looking to engage freelancers. These actions/automated decisions are necessary to provide you with the services and related support. We have implemented measures to safeguard the rights and interests of individuals whose Personal Data is subject to automated decision-making. When we make an automated decision about you, you have the right to contest the decision, to express your point of view, and to require a human review of the decision. You can exercise this right by contacting the Global Data Privacy and Governance Team at [privacy@adp.com](mailto:privacy@adp.com).

## 19. Communication Preferences

You may limit the information you provide to us. You may also limit the marketing communications that we send to you. To opt-out of marketing emails, simply click the link labeled "unsubscribe" at the bottom of any marketing email we send you.

Please note that if you are currently receiving services from us and you have decided to opt-out of marketing communications, we may still send you important administrative messages, from which you cannot opt-out.

If you have questions about your choices or if you need assistance with opting out, please contact us via email to [privacy@adp.com](mailto:privacy@adp.com). You may also write us at the address in the **"How to Contact Us"** section below. If you send us a letter, please provide your name, address, email address, and information about the communications that you do not want to receive.

## 20. Access, Correction, Erasure, and Other Individual Rights

You may contact us to request access to your data, to exercise any of the individual rights afforded to you by us or by applicable data protection laws and regulations. You may also write to us at the address in the **"How to Contact Us"** section below. If you send us a letter, please provide your name, address, email address, and detailed information about the changes you would like to make. We will respond to requests in accordance with applicable data protection laws.

To make an individual rights request for access, correction erasure or other rights, please contact us by completing our webform or by emailing us at [support@workmarket.com](mailto:support@workmarket.com). We will verify and respond to your request consistent with applicable law, taking into account the type and sensitivity of the Personal Data subject to the request. We may need to request additional Personal Data from you, such as your name and email address, in order to verify your identity and protect against fraudulent requests. If you maintain a password-protected account with us, we may verify your identity through our existing authentication practices for your account and require you to re-authenticate yourself before disclosing or deleting your

Personal Data. If you make a request to delete, we may ask you to confirm your request before we delete your Personal Data.

You may also write to us at the address in the **"How to Contact Us"** section below. If you send us a letter, please provide your name, address, email address, and detailed information about your request. We will respond to requests in accordance with applicable data protection laws.

### **Additional Individual Rights for US Consumers**

US consumers may make the following specific rights requests, subject to applicable US consumer privacy law:

**(a) Right to Access, Know and Portability** -- You may request to know whether we process your Personal Data and request to access such Personal Data, including, where applicable, a request to obtain a copy of the Personal Data you provided to us in a portable format.

You may also request that we disclose the following information to you:

- (1) The categories of Personal Data we collected and process about you and the categories of sources from which we collected such Personal Data;
- (2) The specific pieces of Personal Data we collected about you;
- (3) The business or commercial purpose for collecting or sharing Personal Data about you;
- (4) The categories of Personal Data about you that we shared (as defined under the CCPA) and the categories of third parties with whom we shared such Personal Data; and
- (5) The categories of Personal Data that we disclosed about you to third parties, and the categories of third parties to whom we disclosed such Personal Data (if applicable).
- (6) A list of third parties to whom your Personal Data was disclosed.

**(b) Right to Request Correction of your Personal Data** -- You may request to correct inaccuracies in your Personal Data;

**(c) Right to Request Deletion of your Personal Data** -- You may request to have your Personal Data deleted; and

**(d) Right to Opt-out of Targeted Advertising/ "Sharing" for Cross-Context Behavioral** -- You may request to opt-out of targeted advertising, including the "sharing" of your Personal Data for purposes of cross-context behavioral.

**To request to opt-out of any future targeted advertising, including the "sharing" of your Personal Data for purposes of cross-context behavioral or targeted advertising, please go to [ADP.com](https://ADP.com) and click the [Cookie Preferences – Do Not Share My Data](#) link at the bottom of the page, and [WorkMarket.com](https://WorkMarket.com) and click the [Cookie Preferences – Do Not Share My Data](#) link at the bottom of the page, to toggle off advertising cookies.**

We also process opt-out preference signals, such as the Global Privacy Control (GPC). The GPC is a mechanism that enables consumers to automatically communicate their privacy preferences to opt-out of sale and sharing of their personal information to this website. This ensures that the consumer's opt-out preference is honored through compatible browsers or extensions that support GPC, consistently across

all websites accessed through the browser or device you are using. Go to your browser's setting to enable GPC. If enabled you will receive notification or see a visual indication (e.g., banner or pop-up message) on our site confirming that your GPC signal has been detected and your opt-out request has been processed. For information about how to use the Global Privacy Control, please visit <https://globalprivacycontrol.org/>.

We will not unlawfully discriminate against you for exercising your rights under applicable US consumer privacy law.

### **Authorized Agents Submitting a Request on Behalf of a Consumer**

You may choose to designate an authorized agent to make a request on your behalf. No information will be disclosed until the authorized agent's authority has been reviewed and verified. Agents may be asked to provide proof of their status as an authorized agent. Once a request has been submitted by an authorized agent, we may require additional information from you to verify your identity or confirm that you provided the agent permission to submit the request. Authorized agents may submit their request as detailed above.

### **Appeal Process**

If you are a Colorado, Virginia, Montana, Oregon, Texas, or Connecticut consumer, and we refuse to take action on your request, you may appeal our refusal within a reasonable period after you have received notice of the refusal. You may file an appeal by contacting us via email at [support@workmarket.com](mailto:support@workmarket.com).

### **Nevada Privacy Rights**

WorkMarket collects personal information from you in the course of providing requested services. Unless otherwise stated, WorkMarket does not sell any Covered Information, as defined under Nevada law (S.B. 220). If you would like to make a further inquiry regarding the selling of your Covered Information, as defined under Nevada law, please contact [privacy@adp.com](mailto:privacy@adp.com).

## **21. Individuals Located in the European Economic Area**

In addition to the rights already listed in this Privacy Statement, you also have the right to be notified of automated decision making or profiling related to your Personal Data. A Data Protection Officer for the European Economic Area has been appointed and can be reached if you would like to exercise your right. You may reach the Data Protection Officer via email at [DataProtectionOfficer.ADPEMEA@adp.com](mailto:DataProtectionOfficer.ADPEMEA@adp.com) or mail at the address below.

**Data Protection Officer - EMEA**  
**ADP Europe SAS**  
**31 Avenue Jules Quentin**  
**92000 Nanterre**  
**France**



## 22. How to Contact Us

Please contact us if you have questions regarding this Privacy Statement. You may reach us via email at [support@workmarket.com](mailto:support@workmarket.com) or via mail at address below. If you send us a letter, please provide your name, address, email address, and detailed information about your question.

**ADP Global Data Privacy and Governance Team**  
**MS 325**  
**One ADP Boulevard**  
**Roseland, NJ 07068-1728 USA**

WorkMarket, Inc. located at 530 7th Avenue, New York, New York 10018 U.S.A., is the company responsible for collection, use, and disclosure of your Personal Data under this Privacy Statement.

## 23. How to Lodge a Complaint

If you believe that we have not handled your Personal Data properly or that it has breached its privacy obligations, under any applicable data protection laws, you may file your complaint in writing to the address above in the **"How to Contact Us"** section, or via email, to the Global Data Privacy and Governance Team at [privacy@adp.com](mailto:privacy@adp.com).

The Global Data Privacy and Governance Team will investigate each complaint and notify you within a reasonable timeframe of the outcome of the investigation. If you are not satisfied by the resolution you may file a complaint or claim with the relevant regulatory authorities or the courts.

FOR EEA/UK RESIDENTS: You may also lodge a complaint with an EEA or UK data protection authority (as applicable) for your country or region where you have your habitual residence or place of work or where an alleged infringement of applicable data protection law occurs. A list of data protection authorities is available at <https://ec.europa.eu/newsroom/article29/items/612080>. For the UK, the Information Commissioner's Office's contact details can be found [here](#).

## 24. Changes to this Privacy Statement

From time to time, we may update this Privacy Statement, and we encourage you to review it regularly. If we make changes, we will notify you by revising the date at the top of the statement with a new **"Last Updated"** date. Any changes will become effective when we post the revised Privacy Statement on our sites or within our application.