# **Privacy Policy**

The latest update: February 2024

Welcome to goLance.com. goLance, Inc. provides a platform (both mobile and Internet-based) designed to assist contractors to efficiently align themselves with the right clients, and for clients to search, hire, manage, track and pay talent, and for contractors to achieve profitably and manage their workload in the most effective way.

This Privacy Policy regulates how goLance, its contractors, agents, affiliates, assigns, successors, and predecessors (collectively "goLance," "we," "us" or "our") gather, process, share, and protect data related to the goLance website (www.golance.com) and any other websites, mobile applications, products, services, or any other software offered by goLance (collectively the "Website"), and your available options regarding the ways we collect and use your information.

When you access and use our Website, you hereby understand and accept that we are making it possible for you to use this platform to post content, including resumes, private information concerning your services, banking information, photos, comments and other relevant materials (collectively "User Content") and to make the User Content publicly available. The other individuals who use or visit the Website (collectively "Users") may see, search for, share or use any of your User Content information that is publicly available on the Website, which is in accordance with this Privacy Policy and Terms of Service (https://golance.com/terms-of-service).

We have explained here: <a href="https://golance.com/gdpr">https://golance.com/gdpr</a> how we process personal information about people in the European Union (EU), as required under the General Data Protection Regulation (GDPR).

## THE INFORMATION WE COLLECT

We, or third parties on our behalf, may collect information that you provide while visiting and using the Website.

## The information you provide directly:

Your e-mail and password assigned to you when you register in order to use our Website.

User Content you made available on our Website.

The pieces of information shared between you and other users and/or goLance while you communicate.

Information related to a contractor's work may be collected automatically if the contractor is using goMeter. This information includes regular screenshots, keystroke numbers, mouse click

numbers, task descriptions and internet speed connection. We will inform the contractor every time a screenshot is taken via the goMeter. The contractor can manually delete a screenshot and the information related to it in his diary.

We are allowed to collect certain payment information when you use our Website to receive or make payments, such as PayPal, credit cards, debit cards, and other relevant financial account information, including your billing address.

We are allowed to collect your personal information ("**Personal Information**"). For example, your taxpayer identification number or date of birth, and similar, in order to verify your identity. This information collecting activity also includes activities required by law. For example, when you have to complete tax filings. We may also require your documents, such as a copy of your ID or a billing statement or a photo, to verify this information.

We may request an identity verification for compliance and security purposes in order to enforce trust and prevent fraud. You may have to send us documents or participate in a video interview, we may record this interview with your explicit authorization.

You may choose to link your social network to your goLance account. If you register a social network, we may collect information from this social network (such as name, email address and public information you are providing on this social network). Please note that your relationship with any social network is governed solely by your agreement(s) with such social networks. If your social network account terminates, then functions enabled through this link with your goLance account will terminate as well.

You may create a user's profile ("**Profile**"), which includes the personal information about you, such as your username, photographs, portfolio, previous working experience on or outside the Website, skills, hourly rates, feedback, reviews, and other relevant information.

### **Information collected by Third Parties:**

We may use the analytics tools provided by the third-parties in order to evaluate the usage and traffic on our Website. By using these tools, we gather the information you provide when using our Website through your devices. These actions include the web pages you access, add-ons, and all other relevant information that can help us improve our Website and your user's experience. We also collect and process this analytics information with the other Users' analytics information, if it cannot be used to identify an individual User in particular.

# Cookies:

We may use cookies when you visit our Website. We may also use similar technologies, such as web beacons, pixels, and local storage for the purposes of collecting information about the ways you use our Services and the Website.

Please note that we may also ask our partners and advertisers to provide services and serve ads to your devices. These services and ads may use cookies and similar technologies we have mentioned previously. These technologies may be placed by goLance or the third parties.

## Log files:

Log files represent the pieces of information that are automatically identified by your browsers every time you want to access or visit our web page or app. In addition, it can be provided each time the content associated with the webpage and/or app is downloaded to your devices or browsers.

When you access, visit or use the Website, you should know that our servers automatically identify and record certain pieces of your log file information, such as your specific web request, IP (Internet Protocol) address, your browser type, exit and referring pages (including their URLs), number of clicks, the way how you interact with our Service links, domain names, pages viewed, landing pages, and other useful and relevant information. Please be advised that we may gather the similar information from emails we sent to our Users. These emails help us identify and track which pieces of information are used and which links are followed by our recipients. We use this information for the sole purpose of allowing more accurate reports and further improvements to our Website and Services.

## **Device identifiers:**

When you are using your mobile devices, such as phones or tablets to access the Website, you allow us hereby to access, gather, monitor, analyze, and store or remotely store on your devices one or more of our "device identifiers." These particular identifiers represent the small data structures or files that are associated with or stored on your mobile device. The purpose of these identifiers is to identify your mobile devices as the unique devices. These identifiers can be the specific pieces of information stored in relation with your device's hardware, operating system or other relevant software, including the information that's being sent to your devices by us.

The device identifiers may provide the data to us or to the third parties about how you use and/or browse the Website. This information can be used to create specific reports, personalized ads, and other relevant content. Some of the Website's features may not work properly if you decide not to use these device identifiers by disabling or making them unavailable.

#### Metadata:

The technical data, which is related to the User Content, is identified as Metadata. For instance, Metadata can help you determine by whom, how, and when a particular piece of User Content was gathered, formatted, and used.

It is up to the Users to add or to make it possible for Metadata to be associated with their User Content. For example, hashtags (when you mark keywords while posting a photo), geotags

(when you mark your location by associating it with a photo), comments, and other relevant data. As a result of these activities, the User Content becomes more interactive and searchable. If your photo is geotagged or tagged by using other's APIs, the following pieces of information will be stored as more searchable and interactive: your latitude and longitude. If your privacy settings allow it, this photo can be made public.

### HOW WE STORE YOUR INFORMATION.

We may store and process your information obtained through the Website in the USA and/or any other territory in which goLance, the business group goLance is part of or the businesses that are part of goLance, including "Affiliates" and "Service Providers" associated with our Website and Services. GoLance, its Affiliates, and Service Providers are allowed to transfer your information obtained through your use of our Website and Services, including your personal information from your country or jurisdiction to other countries or jurisdictions. In case, you are an EU citizen or live in the region where the data collection laws differ from the US laws in this field, then you should be aware that we may transfer your (personal) information, to a jurisdiction or country that has the different data protection laws compared with your own country or jurisdiction. By registering for and using the Website, you hereby agree to the information transfer to the United States or to any other jurisdiction or country in which goLance, its Affiliates or Service Providers maintain facilities. This acceptance includes the use and disclosure of your information as regulated in this Privacy Policy.

goLance applies the most reasonable safety measures in the industry to protect your information obtained through the Website. We also take the secure steps, such as creating a unique password to go through an identity verification process before being allowed to access your account. Nevertheless, we cannot give you an absolute guarantee that all pieces of information you transmit to goLance or they are otherwise made available on the Website will not be accessed, altered, disclosed or destroyed.

We advise our users to help us improve the security of our Website and Services, by making sure that the secrecy of their account information and unique password are ensured at any given moment. These measures also include access to emails between you and goLance. You should be aware that your privacy settings may also be influenced by changes in the social media services you connect to your goLance account. We cannot accept the responsibility for the privacy, security measures or functionality associated with any other organization.

### **HOW WE USE YOUR INFORMATION**

In addition to the specific uses of information we have already mentioned in this Privacy Policy, we may also use the available information for the following purposes:

To help our Users efficiently access the relevant information after they sign in

To perform transaction monitoring in order to identify transactions which involve fraud, money laundering or criminal offenses, or are contrary to legal or regulatory requirements on us

To remember information, so you do not have to re-enter it when you visit the Website next time or again

To make it possible for you to use personalized content, which may include online ads and other suitable marketing forms

To monitor, test, and improve our Website's effectiveness

To develop, test, and provide new features and products

To monitor the useful metrics, such as the Website's traffic, the total number of visitors, and specific demographic patterns among other things

To identify, diagnose, and fix potential technology issues

To automatically update our Services and the Website

To comply with any procedures, laws and regulations which apply to us

To establish, exercise or defend our legal rights

We do not rent or sell our User's information outside of goLance to third parties.

We may share our User's information with partner companies that goLance works with without your previous consent, except as being regulated by this Policy.

# We may share your information with the following parties:

We are allowed to share our User's Content and information, including the following: cookies-related information, device identifiers, log files, usage, and location data, with our Affiliates. We may use this information with our Affiliates to improve our Services and Website (analytics), including Affiliates' services.

We are allowed to share your information, including the information obtained from location data, device identifiers, cookies, and log files, with our Services Providers. They will have access to your information only as long and where it is necessary to provide their Services.

We are allowed to share certain information (e.g. cookie data) with third-party advertising partners. These pieces of information are required by the third-party advertisers to deliver targeted ads. Their advertising activities will be limited only to the materials that are the most relevant and interesting to you.

We are allowed to remove parts of data, which can be used to identify you and share the anonymous data with the other parties. We are also allowed to combine your information with other relevant pieces of information in the ways that they are no longer associated with you, including the aggregated information that can also be shared.

## You may choose the following parties to share your User Content with:

The User content or information related to you can be voluntarily disclosed on our Website and therefore became publicly available. This means that this information is controlled by the privacy settings you choose.

Please note that the User Content and information you make publicly available can be searched and viewed by other Users.

Should you choose to remove these publicly available pieces of information, you should know that the archived and cached copies can still be searched and viewed by the third parties and other Users, who have copied or saved them.

# The change of control eventualities:

If we decide to sell or in other ways transfer goLance or our assets partially or completely to another organization, for example, a merger, acquisition, dissolution, liquidation, bankruptcy, and similar, your information and User Content that have been collected or made available on the Website can be also transferred or sold. In these eventualities, you will still own the User Content related to you. The transferee or buyer will be obliged to honor all the commitments included in this Privacy Policy.

## Harm prevention measures and legal requests:

Please be advised that we are allowed to access, save, share, and/or disclose your information while processing a legal request. For example, a search warrant, subpoena, court order, and similar. If we believe that we should do so or the law requires us to comply. The additional actions in these matters may include responses and proceedings to legal requests from the non-US jurisdictions, where we have every reason to believe that our actions required by the non-US laws, may affect the users in question, with the full compliance with the internationally recognized and accepted standards. We can also conduct these activities in the following situations: detection, prevention, and properly addressing the fraud and similar illegal activities. When it is required to protect our interests and/or the interests of other users. Including, the situations we need to act in order to prevent damages or harm and/or to support the ongoing investigations. All information we obtained as mentioned in the previous cases can and will be processed, accessed, and retained as long as it is necessary for the legal proceedings and investigations to be conducted successfully and in accordance with the law, including situations with the possible violations of our terms and/or policies.

#### THIRD PARTY SERVICES

We do not accept any kind of responsibility for the actions taken by any third-party websites or services associated directly or indirectly with our Website and/or Services, including all the content and information contained within them. When you use a third-party link that takes you away from our Website to another website, then this Privacy Policy does not apply to those third-party websites or services. This means that your browsing activities and interaction on

these third-party websites or services, including the ones that are associated with our website through links, are to be regulated by these third party's policies. You agree hereby that we will not be responsible because we do not control any third-parties that you may give the authorization to access and process your User Content. Please be advised that when you use a third-party website or service, including your approval for them to access and process your User Content, you are doing so entirely at your own risk.

### THIRD PARTY SERVICES AND SITES

goLance Website may include links to other services and/or websites. When you decide to click on the third parties links, you will be redirected to these third parties websites. The fact that you can use a link to a website does not represent an endorsement, representation and/or authorization of our affiliation with these third parties. In addition, we don't endorse the privacy of information security practices or policies associated with these third parties. You should also know that we cannot accept the responsibility for these third party websites, which are beyond our control. These third-party websites may place their own cookies or other files on your computer. They can also collect data for their own purposes. You are strongly advised to carefully examine the privacy policies or statements of these third party websites you are visiting.

goLance Website use and transfer to any other app of information received from Google APIs will adhere to the <u>Google API Services User Data Policy</u>, including the Limited Use requirements.

### UPDATING PERSONAL INFORMATION

goLance takes steps to ensure that the personal information collected is accurate and up to date. You can update your information through your account profile settings. In the event that you believe your information is in any way incorrect or inaccurate, please let us know immediately.

### **DATA RETENTION**

goLance applies a general rule of keeping personal information only for as long as is required to fulfil the purpose for which it was collected. However, in some circumstances, we will retain your personal information for longer periods of time if it is necessary and relevant for our operations, or to comply with applicable laws, prevent fraud, collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigation, enforce our Website terms and take other actions as permitted by law.

#### **CHILDREN UNDER AGE OF 18**

goLance is only intended for users 18 or older. No one under age 18 should provide any personal information to or on the Website. We do not knowingly collect personal information from children under 18. Parents and guardians should at all times supervise their children's activities. If we learn we have collected or received personal information from a child under 18, we will delete that personal information. If you believe we might have any information from or about a child under 18, please contact us at legal@golance.com.

### DO NOT TRACK

goLance does not respond to Do Not Track signals from your web browser.

### **CHANGES TO OUR PRIVACY POLICY**

We may change or update this Privacy Policy when necessary. Therefore, you are strongly advised to review it from time to time. We may provide additional notices regarding these changes or updates to our users. However, we are not required to do it every time we change or update our Privacy Policy. The presumption is fully valid that your continued use of our Services and the Website after any change or update takes place will represent your acceptance of the latest Privacy Policy version.

### **COMMUNICATIONS FROM GOLANCE**

goLance users may update their choices regarding the types of communications you receive from us through your online account. You also may opt-out of receiving marketing emails from us by following the opt-out instructions provided in those emails. Please note that even if you opt-out from receiving marketing communications, we reserve the right to send you certain communications relating to your account (service announcements or security alerts) via email and other means.

#### **CONTACT US**

Feel free to contact us at help@golance.com if you have any questions or you need clarifications regarding this Privacy Policy.