

## AdeptID Privacy Policy

Last revised and effective as of: Jan 30, 2025

This Privacy Policy applies to information collected by AdeptID, Inc. (“AdeptID” “we” or “us” or “our”), including:

- through your use of the AdeptID website at <https://www.adept-id.com/> and any subdomains thereof (the “Site”) and the services, features, and information available on the Site (together with the Site, along with associated and successor websites, applications, features, information, and services, or any part thereof, the “Service”); and/or
- where we collect or otherwise obtain information about you in your capacity as a job candidate (a “Candidate”) in connection with our product that allows our business customers, such as talent and human resources software vendors or other intermediaries, (each a “People Search Customer”) to search and retrieve Candidate profiles (“People Search”).

As used herein: (a) “you” and “your” mean a user of the Service or a Candidate; (b) “GDPR” means the General Data Protection Regulation (EU) 2016/679; (c) “UK Data Protection Laws” means the UK GDPR and the UK’s Data Protection Act 2018 (“UK DPA 2018”); (d) “UK GDPR” means the UK equivalent of the GDPR, as defined in section 3(10) (and as supplemented by section 205(4)) of the UK DPA 2018; (e) “European Data Protection Laws” means the GDPR and/or UK Data Protection Laws, in each case to the extent applicable; (f) “Canadian Privacy Laws” means the Personal Information Protection and Electronic Documents Act and the Canadian Anti-Spam Legislation; and (g) the terms “using” and “processing” information include using cookies on a computer, subjecting the information to statistical or other analysis and using or handling information in any way, including, but not limited to collecting, storing, evaluating, modifying, deleting, using, combining, disclosing and transferring information within AdeptID or among our affiliates within the United States or internationally.

If an organization with which you are associated (an “Organization”) signs up to use our services, we may receive information about you in connection with our provision of such services to your Organization. To the extent we process that information solely in order to provide such services to your Organization, we will act as a processor on behalf of your Organization in respect of that information, which means: we will handle that information solely at the direction of your Organization; your Organization’s privacy policy (and not this Privacy Policy) will apply to the processing of that information; and your Organization (and not us) is responsible for obtaining all necessary consents and providing you with all requisite information as required by applicable law. To the extent we process your information for any other lawful business purpose of ours, this Privacy Policy will apply to the processing of such information.

This Privacy Policy serves to notify you of the following:

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2. [Where and when is information collected \(including through the use of cookies and action tags\)?](#)
3. [Does AdeptID collect information from children under 13 years of age?](#)
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## 1. WHAT INFORMATION ABOUT ME IS COLLECTED?

In connection with your use of the Service and our offering of People Search, we may collect information about you. Such information may include your name, address, e-mail address, role, company name, company type, use case, API key, telephone number, and the contents of any message you submit to us. Additionally, our Outside Contractor (as defined below) that is responsible for billing and payment processing services (the "Payment Services Provider") may collect your billing and credit card information from you directly.

In particular, in connection with People Search, we may collect your name, address, e-mail address, role, company name, company type, telephone number, date of birth or age, general geographic location, job title and description, job history and experience, industry, education history, social media handles (including Github or similar platforms), social media profile summaries, job summaries, education summaries, sex, interests, skills, professional certifications, languages spoken and proficiency, inferred salary and years of experience, and profiles we generate based on the foregoing categories of information (collectively, "People Search Data").

We may also collect demographic information, browser types, unique device identifiers, device types, requested URL, referring URL, browser language, the pages you view, the date and time of your visit, domain names, city/state, and statistical data involving the use of the Service. To the extent any such information can be used to identify you or can be tied to you in an identifiable manner, such information amounts to and will be deemed to include 'personal data' for the purposes of and as defined in the European Data Protection Laws (to the extent applicable) and 'personal information' for the purposes of and as defined in the Canadian Privacy Laws (to the extent applicable).

We may collect, analyze, and create anonymized data, statistics, or other information obtained through the provision, use and performance of various aspects of the Service, People Search, or otherwise (collectively, "**Anonymized Data**"), and aggregate such Anonymized Data, statistics, or other information. Please note that Anonymized Data is not identifiable and we may use or disclose such Anonymized Data for any lawful business purpose without notice or your consent. We will not re-identify, or attempt to re-identify, any of the Anonymized Data or otherwise link or associate Anonymized Data with any information relating to an identified or identifiable natural person.

## 2. WHERE AND WHEN IS INFORMATION COLLECTED (INCLUDING THROUGH THE USE OF COOKIES AND ACTION TAGS)?

### 2.1 General Sources

We may obtain your information in the following ways:

- 2.1.1 We will collect information that you submit to us;
- 2.1.2 From third parties providing credit and debit card authorization and fraud screening services as part of your use of the Service;
- 2.1.3 If you identify yourself to us by communicating with us including by sending us an e-mail with questions or comments;
- 2.1.4 From third-party partners (such as data brokers) who provide us with employment or other professional-related data; and
- 2.1.5 From publicly available information, including through LinkedIn.

## **2.2 Registering to Use the Service and in the Course of Using the Service.**

You may be required to establish an account in order to take advantage of certain features of the Service. If so, if you wish to establish an account you will be required to provide us with information such as name, e-mail address, company name, and API Key, and including credit card and billing information directly to the Payment Services Provider. Also, we will have access to any information that you choose to share through the Service.

## **2.3 Cookies and Action Tags.**

We may collect information passively using “cookies” and “action tags.”

“Cookies” are small text files that can be placed on your computer or mobile device in order to identify your web browser and the activities of your computer on the Service and other websites. Cookies can be used to personalize your experience on the Service (such as dynamically generating content on webpages specifically designed for you), to assist you in using the Service (such as saving time by not having to reenter your name each time you use the Service), to allow us to statistically monitor how you are using the Service to help us improve our offerings, or to determine the popularity of certain content.

In addition to cookies that we may place on your computer or mobile device, cookies might also be placed on your computer or mobile device by third parties that we use to provide analytics-related services. In the course of providing services, such third-party service providers could place or recognize unique cookies on your browser.

You do not have to accept cookies to use the Service. Although most browsers are initially set to accept cookies, you may reset your browser to notify you when you receive a cookie or to reject cookies generally. Most browsers offer instructions on how to do so in the “Help” section of the toolbar. However, if you reject cookies, certain features or resources of the Service may not work properly or at all and you may experience some loss of convenience.

For the avoidance of doubt, the Service may use third-party service platforms (including to help analyze how users use the Service). These third-party service platforms may place cookies on your computer or mobile device. If you would like to disable “third party” cookies, you may be able to turn them off by going to the third party’s website.

Here are links to the main third-party platforms we use:

<https://www.google.com/policies/privacy/>

<https://legal.hubspot.com/cookie-policy>

<https://automattic.com/privacy/>

<https://www.linkedin.com/legal/cookie-policy>

“Action tags,” also known as web beacons or gif tags, are a web technology used to help track website usage information, such as how many times a specific page has been viewed. Action tags are invisible to you, and any portion of the Service, including e-mail sent on our behalf, may contain action tags.

By using cookies and action tags together, we can gain valuable information to improve the Service and measure the effectiveness of our marketing campaigns. We may also combine information collected from cookies with information that you may provide, such as information provided in a form that you complete.

Note that information collected from cookies and other similar technologies (which may include device identifiers) may be used to send you online advertising for the Service. In particular, information collected from cookies (including cookies placed by third-party vendors, such as Google and its partners) and other similar technologies (which may include device identifiers) may be used to deliver advertisements to users of our Service when such users are using other websites, including Facebook, LinkedIn, and YouTube. These third-party vendors may use cookies and/or device identifiers to serve ads based on your past usage to our Service. You may opt out of a third-party vendor's use of cookies and/or device identifiers for personalized advertising by visiting <https://thenai.org/opt-out/>.

Finally, you should be aware that third parties may use their own cookies or action tags when you click on a link to their websites or services on or from the Service. This Privacy Policy does not govern the use of cookies or action tags or the use of your information by such third-party websites or services.

#### **2.4 Log Files.**

We also collect information through our Internet log files, which record data such as user IP addresses, browser types, domain names, and other anonymous statistical data involving the use of the Service. This information may be used to analyze trends, to administer the Service, to monitor the use of the Service, and to gather general demographic information. We may link this information to other information about you for these and other purposes such as personalizing your experience on the Service and evaluating the Service in general.

### **3. DOES ADEPTID COLLECT INFORMATION FROM CHILDREN UNDER 13 YEARS OF AGE?**

We are committed to protecting the privacy of children. The Service and People Search are not designed for or directed to children under the age of 13. We do not collect information from any person we actually know is under the age of 13.

### **4. WHAT DOES ADEPTID DO WITH THE INFORMATION IT COLLECTS?**

Pursuant to the European Data Protection Laws and Canadian Privacy Laws, legal bases for our processing your information may include (without limitation):

- (a) where you have given consent to the processing, which consent may be withdrawn at any time without affecting the lawfulness of processing based on consent prior to withdrawal;
- (b) where it is necessary to perform the contract we have entered into or are about to enter into with you (whether in relation to the provision of the Service, People Search, or otherwise);
- (c) where it is necessary for us to comply with a legal obligation to which we are subject; and/or
- (d) where it is necessary for the purposes of our legitimate interests (or those of a third party) in providing, improving, or marketing the Service, offering People Search, and your interests or fundamental rights and freedoms do not override those legitimate interests.

We use the information collected: to provide the Service to you and process your transactions; to provide People Search to our People Search Customers; to help us understand who uses the Service; for internal operations such as operating and improving the Service and People Search; to contact you for customer service and billing purposes; and, unless you 'opt out' (to the extent permitted by applicable law), so that we and third parties acting on our behalf can contact you about products and services that may be of interest to you.

We may use your information to send you a welcoming e-mail that may confirm your log-in credentials. Unless you 'opt out' (to the extent permitted by applicable law), we and third parties acting on our behalf

may subsequently send you electronic newsletters, contact you about the Service, products, services, information and news that may be of interest to you, and provide you with targeted feedback. If you no longer desire to receive these communications, we will provide you with the option to change your preferences in each communication we send to you. You may also inform us by e-mail to: [privacy@adept-id.com](mailto:privacy@adept-id.com).

If you identify yourself to us by sending us an e-mail with questions or comments, we may use your information to respond to your questions or comments, and we may file your questions or comments (with your information) for future reference.

We may also use the information collected to send announcements and updates regarding the Service or, if applicable, about your billing account status. You will not be able to unsubscribe from these Service announcements and updates as they contain important information relevant to your use of the Service and are necessary for the performance of our contract with you.

We may also use the information gathered to perform statistical analyses of user behavior or to evaluate and improve the Service or People Search. We may link some of this information to other information for internal purposes or to improve your experience with the Service. In addition, we may also anonymize your information such that it becomes Anonymized Data (so that it can no longer be associated with you), in which case we may use and/or disclose such Anonymized Data for our lawful business purposes. We use reasonable safeguards designed to minimize the risks associated with the process of anonymizing your information.

In connection with People Search, we would like you to be aware that we use algorithms to construct profiles about Candidates and generate other insights and analysis through use of the information described in Section 1 so that an evaluation can be made about a Candidate's fit for a particular position. Under the European Data Protection Laws (to the extent applicable), this usage may be considered profiling. The European Data Protection Laws define "profiling" as "any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements". To the extent our processing constitutes profiling under the European Data Protection Laws (to the extent applicable), you have the right to specifically object to the processing of your personal data for the purpose of profiling in accordance with Section 11 below. To learn more, please reach out to [privacy@adept-id.com](mailto:privacy@adept-id.com).

## **5. WHEN DOES ADEPTID DISCLOSE INFORMATION TO THIRD PARTIES?**

We generally disclose information we gather from you or about you, including through the Service and People Search, to the following types of third parties and as otherwise set forth in this Privacy Policy or as specifically authorized by you.

### ***5.1 Laws and Legal Rights.***

We may disclose your information if we believe in good faith that we are required to do so in order to comply with an applicable statute, regulation, rule or law, a subpoena, a search warrant, a court or regulatory order, lawful requests by public authorities, including to meet national security or law enforcement requirements, or other valid legal process. We may disclose information in special circumstances when we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be violating a contract with us, to detect fraud, for assistance with a delinquent account, or to protect the safety and/or security of our users, Candidates, the Service or the general public.

### ***5.2 Third Parties Generally.***

We may provide information to third parties, including where such information is combined with similar

information of other users of the Service. For example, we might inform third parties regarding the number of unique users who use the Service, the demographic breakdown of our users of the Service, or the products and/or services purchased using the Service and the vendors of such products and services. In addition to the above, when users use our Service, third parties (including without limitation third-party analytics service providers and commercial partners) may directly collect information about our users' online activities over time and across different websites. The third parties to which we may provide or who may independently directly collect information may include potential or actual providers of analytics products or services (including vendors, analytics services providers, and website tracking services), affiliates and other actual or potential commercial partners, and other similar parties. Please note in particular that the Service may use Google Analytics, including its data reporting features. Information collected by Google Analytics includes but is not limited to web metrics. For information on how Google Analytics collects and processes data, please see the site "How Google uses data when you use our partners' sites or apps", currently located at [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/). For information on opting out of Google Analytics, we encourage you to visit Google's website, including its list of currently available opt-out options presently located at <https://tools.google.com/dlpage/gaoptout>.

### **5.3 Professional Advisors.**

We may provide your information to professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

### **5.4 Outside Contractors.**

We may employ independent contractors, vendors and suppliers (collectively, "Outside Contractors") to provide specific services and products related to the Service and/or People Search, such as hosting and maintaining the Service, providing credit card processing and fraud screening, including the Payment Services Provider, and developing applications for the Service. In the course of providing products or services to us, these Outside Contractors may have access to information collected through the Service, including your information. We use reasonable efforts to ensure that these Outside Contractors are capable of protecting the security of your information.

### **5.5 Sale of Business.**

We reserve the right to transfer information to a third party in connection with a sale, merger, general corporate reorganization, or other transfer of all or substantially all of the assets of AdeptID or any of its Corporate Affiliates (as defined below), or that portion of AdeptID or any of its Corporate Affiliates to which the Service relates, or in connection with a strategic investment by a third party in AdeptID, or in the event that we discontinue our business or file a petition or have filed against us a petition in bankruptcy, reorganization or similar proceeding.

### **5.6 Affiliates.**

We may disclose information about you to our Corporate Affiliates. For purposes of this Privacy Policy: "Corporate Affiliate" means any person or entity which directly or indirectly controls, is controlled by or is under common control with AdeptID, Inc., whether by ownership or otherwise; and "control" means possessing, directly or indirectly, the power to direct or cause the direction of the management, policies or operations of an entity, whether through ownership of fifty percent (50%) or more of the voting securities, by contract or otherwise.

### **5.7 People Search Customers.**

In connection with People Search, we may also disclose information to People Search Customers who may use your information for their own lawful business purposes. If we disclose your information to People Search Customers in connection with People Search, such information will be subject to the terms of the People Search Customer's privacy policy and your information may be further disclosed in accordance with the terms of the People Search Customer's privacy policy.

## **6. DOES THIS PRIVACY POLICY APPLY WHEN I LINK TO OTHER WEBSITES OR SERVICES?**

Our Service may provide you with access to other websites and services. This may include providing you with the ability to automatically post updates on Facebook and Twitter/X. Please be aware that we are not responsible for the privacy practices of any websites or services other than the Service. A link to a third-party website does not constitute or imply endorsement by us. Additionally, we cannot guarantee the quality or accuracy of information presented on those websites. We encourage you to read the privacy policies or statements of each and every such website and service. This Privacy Policy applies solely to information collected by us or on our behalf, including through the Service and People Search.

## **7. IS THE INFORMATION COLLECTED THROUGH THE SERVICE OR PEOPLE SEARCH SECURE?**

We want your information to remain secure. We strive to provide transmission of your information from your computer or mobile device to our servers through techniques that are consistent with commercially reasonable standards and to employ administrative, physical, and electronic measures designed to protect your information from unauthorized access.

Notwithstanding the above, you should be aware that there is always some risk involved in transmitting information over the Internet. There is also some risk that others could find a way to thwart our security systems. As a result, while we strive to protect your information, we cannot ensure or warrant the security or privacy of any information you transmit to us, and you do so at your own risk.

## **8. COULD MY INFORMATION BE TRANSFERRED TO OTHER COUNTRIES?**

Information collected on the Service or in connection with People Search may be transferred from time to time to our offices or personnel, or to third parties, located throughout the world, and the Service and People Search may be viewed and hosted anywhere in the world, including countries that may not have laws of general applicability regulating the use and transfer of such information. To the extent required by applicable law: whenever we transfer your information to third parties (as described in this Privacy Policy) located in countries that do not ensure adequate protection for your information (as determined by the European Commission or the UK Information Commissioner's Office), as applicable, each, an "Inadequate Jurisdiction", which, for these purposes, includes one defined by the Office of the Privacy Commissioner of Canada as a jurisdiction without a "comparable level of protection", (as applicable), we ensure a similar degree of protection is afforded to it; we may use specific contracts approved by the European Commission (accessible at [https://eur-lex.europa.eu/eli/dec\\_impl/2021/914/oj](https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj)), the UK Information Commissioner's Office (accessible at <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/international-transfers/international-data-transfer-agreement-and-guidance/>), or the Office of the Privacy Commissioner of Canada, as applicable, which give your information the same protection it has in the European Economic Area or the United Kingdom, as applicable, under the European Data Protection Laws, or in Canada; and if we rely on another basis to transfer your information to an Inadequate Jurisdiction, we will keep you updated or contact you if required. Please contact us if you want further information on the specific mechanisms used by us when transferring your information to an Inadequate Jurisdiction.

## **9. FOR HOW LONG WILL MY INFORMATION BE KEPT?**

We will only retain your information for as long as necessary to fulfill the purposes for which we collected it or as otherwise permitted by applicable law.

To determine the appropriate retention period for information, we consider the amount, nature, and sensitivity of that information, the potential risk of harm from unauthorized use or disclosure, the purposes for which we process your information and whether we can achieve those purposes through other means, and the applicable legal requirements.

## **10. WHAT CHOICES DO I HAVE REGARDING MY INFORMATION?**

We generally use your information as described in this Privacy Policy or as authorized by you or as otherwise disclosed at the time we request such information from you. You generally must “opt in” and give us permission to use your information for any other purpose. You may also change your preference and “opt out” of receiving certain marketing communications from us by following the directions provided in association with the communication or such other directions we may provide or by contacting [privacy@adept-id.com](mailto:privacy@adept-id.com).

Under certain circumstances and in compliance with the European Data Protection Laws and Canadian Privacy Laws, you may have the right to:

**Request access** to your information (commonly known as a ‘subject access request’). This enables you to receive a copy of the information we hold about you and to check that we are lawfully processing it;

**Request correction** of the information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected;

**Request erasure** of your information. This enables you to ask us to delete or remove your information where there is no good reason for us to continue processing it. You also have the right to ask us to delete or remove all of your information in certain circumstances;

**Object to processing** of your information where we are relying on a legitimate interest (or that of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. ***In particular, to the extent our processing constitutes profiling under the European Data Protection Laws, you have the right to specifically object to the processing of your personal data for the purpose of profiling.*** In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms;

**Request the restriction of processing** of your information. This enables you to ask us to suspend the processing of your information, for example, if you want us to establish its accuracy or the reason for processing it;

**Request the transfer** of your information to another party; and

**Lodge a complaint** with the relevant supervisory authority (as defined in the European Data Protection Laws and the Canadian Privacy Laws). If you have any complaints about the way we process your information, please do contact us. Alternatively, you may lodge a complaint with the supervisory authority which is established in your country.

**Withdraw consent** to our collection, use and transfer of your information. To withdraw your consent, please contact us at the addresses provided below. Please note that if you withdraw your consent we may not be able to provide you with a particular product or service.

If you want to review, verify, correct, or request erasure of your information, object to the processing of your information, or request that we transfer a copy of your information to another party, please contact [privacy@adept-id.com](mailto:privacy@adept-id.com).

Such updates, corrections, changes, and deletions will have no effect on other information that we maintain, or information that we have provided to third parties in accordance with this Privacy Policy prior to such update, correction, change or deletion. To protect your privacy and security, we may take reasonable steps (such as requesting a unique password) to verify your identity before granting you profile access or making corrections. You are responsible for maintaining the secrecy of your unique password and account information at all times.

You should be aware that it may not be technologically possible to remove each and every record of the information you have provided to us from our system. The need to back up our systems to protect information from inadvertent loss means that a copy of your information may exist in a non-erasable form that will be difficult or impossible for us to locate. After receiving your request, we will use commercially reasonable efforts to update, correct, change, or delete, as appropriate, your information stored in



databases we actively use and other readily searchable media as appropriate, as soon as and to the extent reasonably practicable.

### ***Do Not Track***

The term “Do Not Track” refers to a HTTP header offered by certain web browsers to request that websites refrain from tracking the user. We take no action in response to automated Do Not Track requests. However, if you wish to stop such tracking, please contact us with your request, using our contact details provided below.

### ***Shine the Light***

Under California Civil Code Section 1798.83, also known as the “Shine The Light” law, if you are a California resident, you may request and obtain from us, once a year and free of charge, information about categories of information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

## **11. HOW WILL I KNOW IF THERE ARE ANY CHANGES TO THIS PRIVACY POLICY?**

We may revise this Privacy Policy from time to time. We will not make changes that result in significant additional uses or disclosures of your information without allowing you to “opt in” to such changes. We may also make non-significant changes to this Privacy Policy that generally will not significantly affect our use of your information, for which your opt-in is not required. We encourage you to check this page periodically for any changes. If any non-significant changes to this Privacy Policy are unacceptable to you, you must immediately contact us and, until the issue is resolved, stop using the Service.

## **12. WHO DO I CONTACT IF I HAVE ANY PRIVACY QUESTIONS?**

If you have any questions or comments about this Privacy Policy, please contact us in any of the following ways:

By e-mail:

[privacy@adept-id.com](mailto:privacy@adept-id.com)

By postal mail or courier:

Attn: Privacy  
AdeptID, Inc.  
184 High Street, Suite 602, Boston, MA 02110

## **13. ADDITIONAL INFORMATION FOR CALIFORNIA RESIDENTS.**

This Section 13 shall apply only to the extent that we are regulated as a business (as defined in the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively with any regulations promulgated thereunder, the “CCPA”)) under the CCPA. This Section 13 shall apply to you only if you are a California resident.

As used in this Section 13, “**sell**” (including any grammatically inflected forms thereof) means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, consumer information (as defined below) to a third party for monetary or other valuable consideration.

As used in this Section 13, “**share**” (including any grammatically inflected forms thereof) means sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, consumer information to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration, including transactions with a third party for cross-context behavioral advertising for our benefit in which no money is exchanged.

The terms “selling” and “sharing” do not include (i) disclosing consumer information to a third party at your direction, (ii) where you intentionally interact with one or more third parties, (iii) where you have opted out in accordance with Section 13, disclosures to persons for the purposes of alerting such persons that you have opted out of the sharing of your consumer information, or (iv) transfers of your consumer information to a third party as an asset that is part of a merger, acquisition, bankruptcy, or other transaction in which the third party assumes control of all or part of AdeptID, provided that information is used or shared consistently with the CCPA.

- a. Consumer Information Collected:** We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with particular California residents or households (“**consumer information**”). Consumer information does not include deidentified or aggregated information, publicly available information or lawfully obtained, truthful information that is a matter of public concern, or any other information that is excepted from the definition of “personal information” under the CCPA, or any information that is otherwise not regulated by the CCPA. For purposes of this Section 13.1, “**publicly available information**” means information that is lawfully made available from federal, state, or local government records, or information that we have a reasonable basis to believe is lawfully made available to the general public by you or from widely distributed media, or information made available by a person to whom you have disclosed the information if you have not restricted the information to a specific audience.

For purposes hereof, “**sensitive consumer information**” means: (1) consumer information that reveals (A) your social security, driver’s license, state identification card, or passport number; (B) your 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; (C) your precise geolocation; (D) your racial or ethnic origin, religious or philosophical beliefs, or union membership; (E) the contents of your mail, e-mail, and text messages, unless we are the intended recipient of the communication; (F) your genetic data; and (2)(A) consumer information consisting of biometric information processed for the purpose of uniquely identifying you; (B) consumer information collected and analyzed concerning your health; or (C) consumer information collected and analyzed concerning your sex life or sexual orientation. We do not use or disclose your sensitive consumer information.

To the extent we consider Deidentified Data outside the scope of the CCPA because it is not identifiable, then, to the extent required by the CCPA, AdeptID hereby publicly commits to process Deidentified Data in its possession only in a de-identified fashion and not attempt to re-identify such Deidentified Data. “Deidentified Data” means data that cannot reasonably be used to infer information about, and that cannot reasonably be linked to, an identified or identifiable California resident.

In particular, with respect to the Service and People Search, we have collected the following categories of consumer information (to the extent such consumer information was not collected from publicly available sources) from California residents or households within the last twelve (12) months and, in connection therewith, we may collect the following categories of consumer information from California residents or households:

<b>Category</b>	<b>Consumer Information Collected</b>	<b>Purposes (Including Business or Commercial Purposes) For Which We Collect or Use Consumer Information</b>	<b>Categories of Third Parties With Whom We Have Shared Consumer Information and the Business or Commercial Purpose For Sharing Such Consumer Information</b>	<b>Categories of Third Parties to Whom We Have Sold Consumer Information and the Business or Commercial Purpose for Selling Such Consumer Information</b>	<b>Categories of Third Parties to Whom We Have Disclosed Consumer Information for a Business Purpose and the Business or Commercial Purposes for Disclosing Consumer Information</b>	<b>Categories of Sources From Which Consumer Information is Collected</b>
A. Identifiers.	Name, address, e-mail address, general geographic location, role, company name, company type, use case, API key, telephone number, the contents of any message you submit to us, social media handles (including Github or similar platforms), social media profile summaries, job summaries, and education summaries.	For the business or commercial purposes set out in Section 5 of this Privacy Policy.	To the categories of third parties set out in Sections 2.3 and 6.2 of this Privacy Policy and for the business or commercial purposes set out in column 3 of this table.	Solely for Candidates, to our People Search Customers and for the purposes of offering People Search as further described in Section 6.7.	To the categories of third parties set out in Section 6.2, 6.4, and 6.7 of this Privacy Policy and for the business or commercial purposes set out in column 3 of this table.	From the categories of sources as set out in Sections 2.1.1 through 2.1.4.
B. Personal information described in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	Name, address, telephone number, job title and description, job history and experience, industry, and education history.	For the business or commercial purposes set out in Section 5 of this Privacy Policy.	To the categories of third parties set out in Sections 2.3 and 6.2 of this Privacy Policy and for the business or commercial purposes set out	Solely for Candidates, to our People Search Customers and for the purposes of offering People	To the categories of third parties set out in Section 6.2, 6.4, and 6.7 of this Privacy Policy and for the business or commercial purposes set out in	From the categories of sources as set out in Sections 2.1.1 through 2.1.4.

			in column 3 of this table.	Search as further described in Section 6.7.	column 3 of this table.	
C. Protected classification characteristics under California or federal law.	Date of birth or age, and sex.	For the business or commercial purposes set out in Section 5 of this Privacy Policy.	N/A	Solely for Candidates, to our People Search Customers and for the purposes of offering People Search as further described in Section 6.7.	To the categories of third parties set out in Section 6.2, 6.4, and 6.7 of this Privacy Policy and for the business or commercial purposes set out in column 3 of this table.	From the categories of sources as set out in Section 2.1.4.
D. Internet or other electronic network activity information.	Demographic information, browser types, unique device identifiers, device types, requested URL, referring URL, browser language, the pages you view, the date and time of your visit, domain names, city/state, and statistical data involving the use of the Service.	For the business or commercial purposes set out in Sections 2.3 and 2.4 and 5 of this Privacy Policy.	To the categories of third parties set out in Sections 2.3 and 6.2 of this Privacy Policy and for the business or commercial purposes set out in column 3 of this table.	N/A	To the categories of third parties set out in Section 6.2 and 6.4 of this Privacy Policy and for the business or commercial purposes set out in column 3 of this table.	Automatically collected by us as set forth in Sections 2.3 and 2.4.
E. Audio, electronic, visual, thermal, olfactory, or similar information.	Audio and video recordings of calls or video conference meetings.	For the business or commercial purposes set out in Section 5 of this Privacy Policy.	N/A	N/A	To the categories of third parties set out in Section 6.2 and 6.4 of this Privacy Policy and for the business or	Automatically collected by us.

					commercial purposes set out in column 3 of this table.	
F. Professional or employment-related information.	Job title and description, job history and experience, industry, education history, interests, skills, professional certifications, languages spoken and proficiency, and years of experience.	For the business or commercial purposes set out in Section 5 of this Privacy Policy.	N/A	Solely for Candidates, to our People Search Customers and for the purposes of offering People Search as further described in Section 6.7.	To the categories of third parties set out in Section 6.2, 6.4, and 6.7 of this Privacy Policy and for the business or commercial purposes set out in column 3 of this table.	From the categories of sources as set out in Section 2.1.1. and 2.1.4.
G. Inferences drawn from other personal information.	Inferred salary and years of experience, and profiles we generate based on the People Search Data.	For the business or commercial purposes set out in Section 5 of this Privacy Policy.	N/A	Solely for Candidates, to our People Search Customers and for the purposes of offering People Search as further described in Section 6.7.	To the categories of third parties set out in Section 6.2, 6.4, and 6.7 of this Privacy Policy and for the business or commercial purposes set out in column 3 of this table.	From the categories of sources as set out in Section 2.1.4.

For the avoidance of doubt, with respect to the Service and People Search, we have not collected sensitive consumer information from California residents or households within the last twelve (12) months and, in connection therewith, we do not collect sensitive consumer information from California residents or households.

- b. Purposes for Collection of Consumer Information; Categories of Sources:** We collect consumer information for the business or commercial purposes described in the tables above and in the manner described in Sections 2 and 5 of this Privacy Policy with respect to your information. Regarding the categories of sources from which consumer information is collected, we collect consumer information from the categories of sources described in the tables above and in the manner described in Section 2 of this Privacy Policy with respect to your information.
- c. Disclosures of Consumer Information for a Business or Commercial Purpose:** AdeptID may disclose your consumer information described in the tables above to a third party for a business or commercial purpose, as described in the tables above and in Sections 2 and 6 of this Privacy Policy with respect to your information. In the preceding twelve (12) months, AdeptID has disclosed the categories of consumer information described in the tables above for a business or commercial purpose to the categories of third parties described in the tables above.
- d. Sharing and Sales of Consumer Information:**

  - i. Your consumer information (as described in the tables above) may be shared and/or sold for the business or commercial purposes set forth in the tables above.
  - ii. In the preceding twelve (12) months, AdeptID has shared and/or sold the categories of consumer information as described in the tables above.
  - iii. AdeptID does not have actual knowledge that it shares or sells the consumer information of minors under the age of 16.
- e. California Residents' Rights and Choices:** The CCPA provides California residents with specific rights regarding their consumer information. This Section describes your CCPA rights (to the extent applicable to you) and explains how to exercise those rights.

  - i. Access to Specific Information and Data Portability Rights:** You may have the right to request that AdeptID disclose certain information to you about our collection and use of your consumer information over the past twelve (12) months or such other period required by the CCPA. Once we receive and confirm your verifiable consumer request (in the manner described in Section 13.6 below), to the extent required by the CCPA, we will disclose to you:

    1. The categories of consumer information we collected about you.
    2. The categories of sources for the consumer information we collected about you.
    3. Our business or commercial purpose for collecting, sharing, or selling that consumer information.
    4. The categories of third parties to whom we disclose that consumer information.
    5. The specific pieces of consumer information we collected about you (also called a data portability request).

6. If we shared, sold, or disclosed your consumer information for a business or commercial purpose, two separate lists disclosing (i) sharing or sales, identifying the consumer information categories that each category of third party purchased or received; and (ii) disclosures for a business or commercial purpose, identifying the categories of recipients to whom such consumer information was disclosed and the consumer information categories that each category of recipient obtained.

ii. **Deletion Request Rights:** You have the right to request that AdeptID delete any of your consumer information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm a verifiable request from you or your authorized agent (in each case if you are a California resident) in the manner described in Section 13.6 below (“**verifiable consumer request**”), we will delete (and notify our service providers and/or contractors to delete and notify all third parties to whom we have shared or sold the consumer information to delete, unless this proves impossible or involves disproportionate effort) your consumer information from our records, unless an exception applies or retention of your consumer information is otherwise permitted by the CCPA. We may deny your deletion request if retaining the information is reasonably necessary for us or our service provider(s) and/or contractor(s) to:

1. Complete the transaction for which we collected the consumer information, provide a product or service that you requested, take actions reasonably anticipated by you within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
2. Help to ensure security and integrity to the extent the use of your consumer information is reasonably necessary and proportionate for those purposes.
3. Debug to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise that consumer’s free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
6. Engage in public or peer-reviewed scientific, historical, or statistical research that conforms or adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the ability to complete the research, if you have provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us and compatible with the context in which you provided the information.
8. Comply with a legal obligation.

- iii. **Correction Request Rights:** You have the right to request that we correct inaccurate consumer information about you that we maintain, taking into account the nature of the consumer information and the purposes of the processing of the consumer information. If we receive a verifiable consumer request from you to correct inaccurate consumer information, we will use commercially reasonable efforts to correct such inaccurate consumer information as directed by you, pursuant to Section 1798.130 of the CCPA and regulations adopted pursuant to the CCPA.

f. **Exercising Access, Data Portability, Correction, and Deletion Rights:**

- i. To exercise the access, data portability, correction, and deletion rights described in Section 13.5 above, please submit a verifiable consumer request to us by either: (1) calling us at 1-855-617-5719; (2) visiting <https://www.adept-id.com/>; or (3) contacting us in accordance with Section 13.2. Only you, or someone legally authorized to act on your behalf (such as an authorized agent), may make a verifiable consumer request related to your consumer information. Someone legally authorized to act on your behalf (such as an authorized agent) may make a verifiable consumer request on your behalf, provided that you have duly authorized that person or entity to make such a verifiable consumer request on your behalf and provided that that person or entity can provide verification of their authority to make such a request on your behalf where required. You may also make a verifiable consumer request on behalf of your minor child. You may make a verifiable consumer request for access or data portability no more than twice within a twelve (12) month period. The verifiable consumer request must: (i) provide sufficient information that allows us to reasonably verify you are the person about whom we collected consumer information or an authorized agent; and (ii) describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. We cannot respond to your request or provide you with consumer information if we cannot verify your identity or authority to make the request and confirm the consumer information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use consumer information provided for the purposes of verification of a consumer request to verify the requestor's identity or authority to make the request. We use the following process to verify consumer requests: in the event you make a request under this Section, we may take various approaches to verify your identity depending on the nature of your request. These approaches may include reaching out to you by e-mail or initiating video conferencing or telephone calls with you or otherwise to ask you questions pertaining to the information we have about you. For instructions on exercising sharing or sale opt-out rights, see Section 13.7 below.
- ii. We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to ninety (90) days), we will inform you of the reason and extension period in writing. If you have an account with us, we may deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your consumer information that is readily useable and should



allow you to transmit the information from one entity to another entity without hindrance. If your requests are manifestly unfounded or excessive, in particular because of their repetitive character, we may either charge a reasonable fee, taking into account the administrative costs of providing the information or communication or taking the action requested, or refuse to act on the request and notify you of the reason for refusing the request.

**g. Notice of Right to Opt-Out of Sale/Sharing of Consumer Information**

- i. If you are 16 years of age or older, you have the right to direct us to not sell or share your consumer information at any time (the “**right to opt-out**”). We do not sell or share the consumer information of California residents we actually know are less than 16 years of age. California residents who opt-in to consumer information sales or sharing may opt-out of future sales or sharing at any time.
- ii. To exercise the right to opt-out, you (or your authorized agent) may submit a request to us by visiting the following Internet Web page link:

**[Do Not Sell or Share My Personal Information](#)**

- iii. Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize consumer information sales or sharing. However, you may change your mind and opt back in to consumer information sales or sharing at any time by visiting the following Internet Web page link:

**<https://www.adept-id.com/opt-out-preferences/>**

- iv. You do not need to create an account with us to exercise your opt-out rights. We will only use consumer information provided in an opt-out request to review and comply with the request.
- v. Someone legally authorized to act on your behalf (such as an authorized agent) may make a request on your behalf under this Section 13.7, provided that you have duly authorized that person or entity to make such request on your behalf and provided that that person or entity can provide verification of their authority to make such a request on your behalf where required.
- vi. Please note that you may opt-out of sharing by using a universal opt-out mechanism or opt-out preference signal (on the browsers and/or browser extensions that support such a signal), such as Global Privacy Control (“GPC”). You can learn more about Global Privacy Control by visiting [www.globalprivacycontrol.org](http://www.globalprivacycontrol.org). Such universal opt-out mechanism or opt-out preference signal will apply solely to information we collect via your browser. However, in connection with our offering of People Search, please note that we collect People Search Data from third-party partners (such as data brokers) who provide us with employment or other professional-related data. Such People Search Data is not collected through any browser or device and the People Search Data we may collect about you is not tied to your browser or device. Accordingly, you would not be able to use an opt-out preference signal to opt out of the sale of data collected in connection with People Search, because that

People Search Data is not tied to your browser or device. For clarity, using an opt-out preference signal will not opt you out of the sale of your data via People Search. If you want to exercise your opt-out rights with respect to People Search Data, please follow the instructions above in Section 13.7.2. And if we detect you are using a universal opt-out mechanism or opt-out preference signal, we may prompt you to consider whether you would like to submit a manual request to opt out of sales.

**h. Non-Discrimination**

- i. We will not discriminate against you for exercising any of your CCPA rights, including, unless permitted by the CCPA, by:
  - 1. Denying you goods or services;
  - 2. Charging you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
  - 3. Providing you a different level or quality of goods or services;
  - 4. Suggesting that you may receive a different price or rate for goods or services or a different level or quality of goods or services; or
  - 5. Retaliating against an employee, applicant for employment, or independent contractor, as defined in subparagraph (A) of paragraph (2) of subdivision (m) of Section 1798.145 of the CCPA for exercising their rights under the CCPA.
- i. **Consumer Information Retention.** We will retain your consumer information in accordance with Section 10 of this Privacy Policy.
- j. **Contact.** If you have any questions or concerns relating to this Privacy Policy and/or our consumer information practices, please contact us in accordance with Section 13.2.

**14. Additional Information for Certain U.S. State Residents**

As used in this Section 14, the term “Other State Laws” refers to certain U.S. state laws (other than the CCPA) including any regulations promulgated thereunder such as the Colorado Privacy Act, the Connecticut Act Concerning Personal Data Privacy and Online Monitoring, the Texas Data Privacy and Security Act, or the Virginia Consumer Data Protection Act, and other substantially similar U.S. state laws that may become effective from time to time.

Please be aware that the Other State Laws may not apply to AdeptID and consequently may not give you certain rights even if you are a resident of a state that has adopted a general data protection law. Generally, Other State Laws apply to businesses that meet certain thresholds based on the amount of information a business processes of individuals residing in a given state during a calendar year. In many states, the relevant threshold requires that AdeptID process the information of a certain number of individuals in such state in a calendar year, which, depending on the state, AdeptID may not meet. For the avoidance of doubt, this Section 14 shall only apply to the extent we are regulated by, and you are granted rights by, such Other State Laws.

Without limitation of any other provision in this Privacy Policy, in connection with the Service and

People Search:

- AdeptID processes the information described in the Sections 1 and 2 of this Privacy Policy for the purposes described in the Sections 2 and 5 of this Privacy Policy; and
- AdeptID may disclose each of the categories of information described in the Sections 1 and 2 of this Privacy Policy to the categories of third parties described in the Sections 2.3 and 6 of this Privacy Policy.

Without limitation of the foregoing, for ease of reference, please find below a description of the categories of information we collect and for what purpose(s):

<b>Categories of Information Collected</b>	<b>Purposes for Which We Collect or Use the Information</b>
Name, address, e-mail address, general geographic location, role, company name, company type, use case, API key, telephone number, the contents of any message you submit to us, and social media handles (including Github or similar platforms).	For the business or commercial purposes set out in Section 5 of this Privacy Policy.
Date of birth or age, and sex.	For the business or commercial purposes set out in Section 5 of this Privacy Policy.
Demographic information, browser types, unique device identifiers, device types, requested URL, referring URL, browser language, the pages you view, the date and time of your visit, domain names, city/state, and statistical data involving the use of the Service.	For the business or commercial purposes set out in Sections 2.3 and 2.4 and 5 of this Privacy Policy.
Job title and description, job history and experience, industry, education history, interests, skills, professional certifications, languages spoken and proficiency, and years of experience.	For the business or commercial purposes set out in Section 5 of this Privacy Policy.
Inferred salary and years of experience, and profiles we generate based on the People Search Data.	For the business or commercial purposes set out in Section 5 of this Privacy Policy.

**14.1 Your Rights**

Under the Other State Laws, you may have the right under certain circumstances to:

- Confirm whether we process your information and to access such information.
- Correct inaccuracies in your information, taking into account the information's nature and our purpose for processing it.
- Delete certain information we may hold about you.
- Data portability.

- To the extent applicable, opt-out of information processing for targeted advertising, sales, or profiling in furtherance of decisions that produce legal or similarly significant effects.
- To the extent applicable, request a list of specific third parties to whom we have disclosed your information or information relating to identified or identifiable natural persons in general.
- To the extent applicable, the right to question the results of profiling in furtherance of decisions that produce legal or similarly significant effects concerning you, to be informed of the reason that the profiling resulted in the decision, and, if feasible, to be informed of what actions you might have taken to secure a different decision and the actions that you might take to secure a different decision in the future. You also have the right to review the information used in the profiling. And if the decision is determined to have been based upon inaccurate information, taking into account the nature of the personal data and the purposes of the processing of the personal data, you have the right to have the information corrected and the profiling decision reevaluated based upon the corrected information.

To exercise any of these rights or, where applicable, withdraw your consent (to the extent the Other State Laws grants such rights to you with respect to our processing of your information), your or your authorized agent may contact us in accordance with Section 12 of this Privacy Policy. To appeal a decision regarding a consumer rights request, please contact us in accordance with Section 12 of this Privacy Policy. If possible, it would be helpful if you could detail the basis of your appeal in your communication.

We use the following process to verify any requests: in the event you or your authorized agent make a request to exercise your rights under the Other State Laws, we may take various approaches to verify your identity depending on the nature of your request. These approaches may include reaching out to you by e-mail or initiating video conferencing or telephone calls with you or otherwise to ask you questions pertaining to the information we have about you.

#### **14.2 Opt-Out Preference Signals**

Please note that you may opt-out of targeted advertising by using a universal opt-out mechanism or opt-out preference signal (on the browsers and/or browser extensions that support such a signal), such as Global Privacy Control (“GPC”). You can learn more about Global Privacy Control by visiting [www.globalprivacycontrol.org](http://www.globalprivacycontrol.org). Such universal opt-out mechanism or opt-out preference signal will apply solely to information we collect via your browser.

However, in connection with our offering of People Search, please note that we collect People Search Data from third-party partners (such as data brokers) who provide us with employment or other professional-related data. Such People Search Data is not collected through any browser or device and the People Search Data we may collect about you is not tied to your browser or device. Accordingly, you would not be able to use an opt-out preference signal to opt out of the sale of data collected in connection with People Search, because that People Search Data is not tied to your browser or device. For clarity, using an opt-out preference signal will not opt you out of the sale of your data via People Search. If you want to exercise your opt-out rights with respect to People Search Data, please follow the instructions below in Section 14.5. And if we detect you are using a universal opt-out mechanism or opt-out preference signal, we may prompt you to consider whether you would like to submit a manual request to opt out of sales.

#### **14.3 Deidentified Data**

Please note that to the extent we consider Deidentified Data outside the scope of the Other State Laws because it is not identifiable, then, to the extent required by the Other State Laws, we hereby publicly commit to process Deidentified Data in our possession only in a de-identified

fashion and not attempt to re-identify such Deidentified Data. “Deidentified Data” means data that cannot reasonably be linked to an identified or identifiable individual, or a device linked to that individual.

#### **14.4 Profiling**

***In connection with People Search, we would like you to be aware that we may use algorithms to create profiles about Candidates using the People Search Data and generate other insights and analysis through use of such People Search Data so that an evaluation can be made about a Candidate’s fit for a particular position.*** Please see this page for more information as to the logic used in the profiling process: <https://docs.adept-id.com/docs/modeling-faqs>. These profiles may be used in furtherance of decisions by People Search Customers related to the provision of employment opportunities. We take commercially reasonable steps designed to ensure that the profiles provided by People Search are accurate, used in a fair manner, and to reduce potential bias, for more information on how our models are audited, please see this page: <https://docs.adept-id.com/docs/model-audit-report>. The creation of profiles may benefit you in allowing People Search Customers to efficiently identify you for an open position without requiring as much human involvement that a manual recruiting process would entail.

To the extent our creation of profiles is considered “profiling” under the Other State Laws, you may opt out of our creation of such profiles by <https://www.adept-id.com/opt-out-preferences/>

#### **14.5 Selling**

***In connection with People Search, we may sell the People Search Data described in Section 1 of this Privacy Policy, including profiles (as further described in Section 14.3) to People Search Customers (as further described in Section 6.7 of this Privacy Policy).***

To the extent our selling of profiles is constitutes a sale of your information under the Other State Laws, you may opt out of such sales by <https://www.adept-id.com/opt-out-preferences/>

#### **14.6 Targeted Advertising**

***In connection with the promotion of our products and services, we may engage in targeted advertising.*** This means that we (or our commercial partners) may display an advertisement to you that is selected based on information that we obtained or inferred over time from your activities across other websites, applications or other online services to predict your preferences or interests. You may opt out of targeted advertising by <https://www.adept-id.com/opt-out-preferences/>

#### **14.7 Retention**

We will retain your information in accordance with Section 10 of this Privacy Policy.

### **15. Additional Information for Texas Residents**

The entity maintaining this website is a data broker under Texas law. To conduct business in Texas, a data broker must register with the Texas Secretary of State (Texas SOS): <https://www.sos.state.tx.us/statdoc/data-brokers.shtml>.

### **16. Additional Information for Nevada Residents**

Nevada residents may have the right to opt out of the sale of their information. Nevada residents may opt out of such sales by <https://www.adept-id.com/opt-out-preferences/>