

# VERTO

## CAREERS PRIVACY NOTICE

**Effective Date: 1/1/2023**

Verto and its subsidiaries are committed to protecting your privacy. We created this Careers Privacy Notice (“Notice”) to give you confidence as you visit and use the Verto careers site and participate in Verto’s recruitment process (collectively, the “Service”). All references to “we”, “us”, “our”, or “Verto” refer to Verto Education, Inc., a Delaware public benefit corporation, and its subsidiaries. All references to “you”, “your”, or “user” refers to the individual . Do not hesitate to contact us at [people@vertoeducation.org](mailto:people@vertoeducation.org) if you have any questions or want to discuss this Notice. The entity that is responsible for this information is the Verto entity for which you apply for a job and hires you.

This Notice describes the types of personal data we collect about individuals as part of our recruitment process, how we may use the information, with whom we may share it, and the choices and rights available regarding our use of the information. This Notice also describes the measures we take to safeguard the personal data, how long we retain it and how individuals can contact us about our privacy practices and to exercise their rights.

By using the Service and agreeing to this Policy, you consent to the privacy practices described in this Policy.

### **Information We Obtain**

The types of personal data we obtain for recruitment purposes may include:

- Contact information (e.g., name, email and postal address, and phone number);
- Professional or employment-related information, such as your resume or CV, prior employment details, performance-related information (e.g., evaluations and training), talent management information (e.g., education details, certifications, professional associations, skills, and awards and other achievements), historical compensation details, and references;
- Pre-employment screening and background check information; and
- Any other information you provide (e.g., cover letter, photograph, articles, and comments).

Verto may collect this information in a variety of ways, including from application forms, CVs or résumés, identity documents, third parties (such as recruiters, references, or background checks), or through interviews or other forms of assessment.

The information we request as part of the job application process is necessary to enter into a

possible employment contract. Failure to provide this information may prevent us from evaluating or otherwise processing your application.

## **How We Use the Information About You**

Verto uses your personal data for the purposes of carrying out its job application and recruitment process. Such uses include:

- Assessing your skills, qualifications, and interests against our career opportunities and determining your suitability for employment;
- Deciding whether to offer you a job;
- Verifying your information and carrying out reference checks and/or conducting background checks (where applicable) if you are offered a job;
- Communications with you about the recruitment process and/or your job application(s);
- Recommending potential career opportunities based on your skills, qualifications, and interests;
- Creating and/or submitting reports as required under any applicable laws or regulations;
- Where requested by you, assisting you with obtaining an immigration visa or work permit where required;
- Making improvements to Verto's job application and/or recruitment process, including improving diversity, equity, and inclusion in our recruitment practices;
- Fulfilling the purpose for which you provide it; and/or
- Complying with applicable laws, regulations, legal processes, or enforceable governmental requests.

We also use your information if we have a legitimate interest to do so, including staffing open positions at Verto. For example, if your application for employment is not accepted, we may keep your information so we can inform you of future job openings at Verto. You can always opt-out from the communication concerning future job openings by clicking on the unsubscribe link within the email you receive from us or by contacting us as indicated below.

## **Information We Obtain by Automated Means**

We obtain certain information by automated means when you visit our careers site, such as cookies and other technologies. For more information on personal data we may automatically collect, please see our [Privacy Policy](#).

## **Information Sharing**

Verto takes care to allow your personal data to be accessed only by those who need such access to perform their tasks and duties, and to third parties who have a legitimate purpose for processing or accessing it. As such, we may share your personal data as described in this Notice to the following categories of recipients:

- To our subsidiaries, affiliates, or their or our successors or assigns.

- To our contractors, business partners, service providers, and other third parties who require the data to carry out work relating to the job applicant and/or recruitment process on our behalf, provided such parties provide at least the same level of privacy protection as is required of Verto. These companies are authorized to use your personal data only as necessary to provide these services to us.
- To a potential buyer (and its agents and advisors) in connection with any proposed merger, acquisition, or any form of sale or transfer of some or all of our assets (including in the event of a reorganization, dissolution or liquidation), in which case, personal data held by us about you will be among the assets transferred to the buyer or acquirer.
- To a third party under the following circumstances where we, in good faith,: (i) believe we are compelled by applicable law or regulation, judicial request from a court of competent jurisdiction, or another legal process or government authority; (ii) find it necessary to exercise, establish or defend our legal rights; (iii) seek to enforce or apply our [Terms of Service](#), [Privacy Policy](#), or terms of any other agreement; (iv) seek to protect Verto’s rights or property; (v) seek to protect Verto’s, our employees, participants, or other Verto stakeholders, or the public from harm or illegal activities; (vi) seek to respond to an emergency which we believe, in good faith requires us to disclose data to prevent harm; or (vii) rely on your consent.
- Upon request, to a Verto employee who referred you to inform them about the limited, general status of the referral.

Please note that we do not sell (as defined in applicable data protection and privacy laws) your personal data (and will not sell it without providing any required notices and/or opt-in/opt-out rights).

Some of these recipients may be located in countries other than the country in which the information originally was collected. Those countries may not have the same data protection laws as the country in which you initially provided the information. If you are located in the European Economic Area (“EEA”), the United Kingdom (“UK”) or Switzerland, your personal data will be transferred to Verto and its service providers in the United States. U.S. laws have not been recognized by the European Commission as providing for an adequate level of data protection. When we transfer your information to recipients in other countries (such as the U.S.), we will protect that information as described in this Notice and will comply with applicable legal requirements providing adequate protection for the transfer of personal data to recipients in countries other than the one in which you provided the information, including by implementing appropriate safeguards based on the European Commission’s Standard Contractual Clauses. Subject to applicable law, you may obtain a copy of these safeguards by contacting us as at [people@vertoeducation.org](mailto:people@vertoeducation.org).

### **Retention of Personal data**

Unless a longer retention period is required by law, we will retain your personal data for as long as is needed to fulfill the purposes outlined in this Notice, or for as long as we have a legitimate business interest that is not outweighed by your data protection interests or fundamental rights and freedoms. When we have no ongoing legitimate business need to process your personal data, we will either delete or anonymize it or, if this is not possible (e.g., because your personal data has been stored in backup archives), then we will securely store your personal data and isolate it

from any further processing until deletion is possible. As such, we reserve the right to use such anonymous data for any legitimate business purpose without further notice to you or your consent.

### **How We Protect Personal data**

We maintain administrative, technical and physical safeguards designed to protect personal data we obtain against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.

### **California Residents**

If you are a resident of the State of California, certain other privacy-related rights may apply to you in accordance with the California Consumer Privacy Act of 2018 (“CCPA”) and the California Privacy Rights Act of 2020 (“CPRA”), including the right to know what personal information about you we have collected, whether your personal information was shared with third-parties in the preceding year and, if so, what categories of personal information were shared, as well as the categories of third parties with whom we shared that personal information. Please see our [California Privacy Notice](#) for more information.

### **Your Rights and Choices**

To the extent provided by applicable law, you may: (1) request access to the personal data we maintain about you; (2) request that we update, correct, amend, or erase your personal data; or (3) request the restriction of our use of your personal data, by contacting us as at [people@vertoeducation.org](mailto:people@vertoeducation.org).

If you are located in the EEA and the UK, you also may object to the use of your personal data in certain situations in which we use that personal data based on our legitimate interests, as described above. Depending on your location, you may have the right to file a complaint with a privacy regulator if you are not satisfied with our response.

### **How To Contact Us**

If you have any questions or comments about this Policy or our Service, please feel free to contact us by email at [people@vertoeducation.org](mailto:people@vertoeducation.org), or by mailing to us your questions or comments to the following address:

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