

## **Privacy Policy - United States and Canada**

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### **1. Overview**

Career Allies, Inc., doing business as Tilt (“Tilt”, “we” “our” or “us”) is committed to protecting your privacy. This Privacy Policy explains who we are, how we collect, use, and share Personal Information about you and how you can exercise your privacy rights. This Privacy Policy describes (unless a different privacy notice is displayed) our privacy practices regarding the personal information we collect from individuals in the usual course of business, including when you:

- Visit any of our websites (such as <https://hellotilt.com/>); visit our social media pages; receive communications from us; or register for, attend and/or otherwise take part in any of our events, tutorials, webinars, or contests (collectively “Visitors”); and
- Register to or otherwise use any of the Tilt’s Services as a team member or employee of one of our Customers (collectively “Users”), when we act as a controller of your Personal Information.

“You” may, depending on the context, be a Visitor or a User of one or more of the Tilt Services.

This Privacy Policy does not apply to Personal Information relating to Tilt’s employment or recruitment-related activities. For purposes of this Privacy Policy, “Personal Information” means any information relating to an identified or identifiable individual (e.g., name, address, email address, or phone number). Personal Information does not include publicly available information or aggregated information that does not include personal identifiers.

### **2. About Us**

We are Tilt, a company headquartered in Fort Collins, Colorado. We offer leave management software and services to help companies efficiently handle employee leave of absence through a combination of technology and dedicated human support. In support of our mission to make leave not suck, we provide a hosted platform and related tools, including the Tilt applications (the “Tilt Services”), that help people teams across the United States and Canada more effectively manage and engage with their employees during the leave process to help build employee trust and ensure compliance. You can learn more about Tilt’s Services here: <https://hellotilt.com/platform/>.

### **3. Tilt as a Service Provider/Processor**

Tilt Customers are organizations who use the Tilt Services to help them manage employee leave. Tilt processes Personal Information in these services only according to our Customer’s and their User’s instructions (as defined in our Customer agreements). If you have questions about Personal Information you have entered into the Tilt Services used by one of our Customers, or want to exercise any of your rights regarding your Personal Information, our Customer contract requires that we redirect your inquiry back to that Customer. This Privacy Policy does not apply to the Personal Information we process as a service provider or processor on behalf of our Customers.

Tilt is not responsible for the privacy or security practices of our Customers, which may differ from those set out in this Privacy Policy. Please review the relevant Customer's privacy policy to understand more about their data processing activities.

#### **4. Privacy Principles**

Tilt follows these principles in order to protect your privacy:

- We do not collect any more Personal Information than is necessary to provide the Services or to fulfill our legitimate business purposes;
- We only use your Personal Information for the purposes we specify in this Privacy Policy, unless you are notified otherwise;
- We do not keep your Personal Information after it is no longer needed; and
- Other than as specified in this Privacy Policy, we do not share your Personal Information with third parties and are not in the business of selling your Personal Information.

#### **5. What Information do we Collect?**

The information we collect depends on the ways you interact with Tilt and the choices you make (including your privacy settings), the products and features you use, your location, and applicable law.

##### **A. Information You Provide to Us**

Visitors: When a Visitor to our website contacts us and/or registers for information, content, or an event sponsored by Tilt, we will collect certain personal information so that we may fulfill the Visitor's request or keep in touch with them in connection with our sales and marketing activities (always in accordance with a Visitor's marketing preferences). The Personal Information we collect and we may have collected in the past twelve (12) months include:

- Identifiers, such as your name and business e-mail address;
- Professional or employment-related information, such as company name, job level, functional role, and title;
- Inferences, such as your contact preferences; and
- Any other information you provide to us when completing any "free text" boxes in our forms or when you interact with us in the context of troubleshooting and support.

Users: If you are a User, you (or the administrator from which you have been provided access to the Tilt Services) may provide certain Personal Information to us through the Tilt Services – for example, when you register for a Tilt account to access and use the Tilt Services, or when you consult with customer support, send us an email, or communicate with us in any way (for example, to make a support request). The Personal Information we collect may include:

- Business information (such as your name, job title, the person you report to, phone number, email address, and country);
- Personal information that you provide to us or that is collected on behalf of our customer as it relates to your employment;
- Marketing information (such as your contact preferences);
- Account log-in credentials (such as your email or username and password when you sign up for an account with us and the unique User ID assigned to you in our systems);
- Troubleshooting and support data (which is data you provide or we otherwise access in connection with support queries we receive from you). This may include, for example, contact or authentication data, the content of your chats and other communications with Tilt, and the product or service you are using related to your help inquiry; and

If you ever communicate directly with us, we will maintain a record of those communications and responses. Please note that if you choose not to provide your Personal Information to us, we may not be able to fulfill your request(s) (e.g., to register for an event or to receive marketing communications from us).

## **B. Information We Collect Automatically**

Visitors: As is true of most websites, when you visit our sites or interact with our emails, we gather certain technical information from your browser or device automatically and store it in log files. To the extent that this automatically-collected data includes, or is linked to, Personal Information, we will treat the data in accordance with this Privacy Policy. This information we collect includes:

- Identifiers, such as your internet protocol (IP) addresses and browser type; and
- Internet or other electronic network activity, such as your internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data.

We use this information to analyze trends, to improve and personalize our marketing activities and websites, to administer our websites and guarantee their security and continued proper functioning, to track Visitors' movements around the website, and to gather non-identifiable, demographic information about our user base as a whole. We may link this automatically-collected data to Personal Information provided by Visitors, or to other publicly available information hosted on the internet, so that we can better gauge our Visitors' needs and provide specific information to best serve them.

In some cases, we may use cookies and related technologies to collect or manage certain information from your browser and computer. Please see the section "Cookies and Similar Tracking Technologies" below for more information.

Users: When you use or interact with the Tilt Services, we automatically collect or receive certain information through our Services (for example, in log files) and through other technologies (such as cookies) about your device and usage of the Tilt Services. Please see the section “Cookies and Similar Tracking Technologies” below for more information. The information we collect includes:

- Log and usage data, which is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use the Tilt Services and which we record in log files. This log data may include the Internet Protocol (IP) address, device information, browser type and settings, and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches and other actions you take [for example, which features you use]), device event information (such as system activity, error reports, and hardware settings).
- Device data, such as information about your computer, phone, tablet, or other device you use to access the Tilt Services. This device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information. If you are using our mobile app, we may also collect information about the phone network associated with your mobile device, your mobile device’s operating system or platform, the type of mobile device you use, your mobile device’s unique device ID, and information about the features of our mobile app you accessed.
- This information is used to:
  - maintain the security of the Tilt Services;
  - provide necessary functionality;
  - improve performance of the Tilt Services;
  - assess and improve your experience of the Tilt Services;
  - identify future opportunities for development of the Tilt Services;
  - assess capacity requirements;
  - identify customer opportunities and for the security of Tilt generally (in addition to the security of the Tilt Services); and
  - analyze overall trends to help us provide and improve the Tilt Services and to improve their security and proper functioning.

### **C. Information We Collect from Third Parties**

In order to enhance our ability to provide relevant marketing, offers, and services to you and update our records, we may obtain information about you from other sources, such as public databases, joint marketing partners, affiliate programs, data providers, social media platforms, as well as from other third parties. This information may include your mailing address, job title, functional role, business email, phone numbers, intent data (or user behavior data), IP addresses, social media profiles, social media URLs, and custom profile. We process this data for the purposes of: updating our records; targeted

advertising; event promotion; optimizing our sites and the Tilt Services; and for our sales and marketing activities, including to send marketing emails.

## **6. Website Analytics, Cookies and Tracking Technology**

Cookies and similar tracking technologies, such as beacons, scripts, web beacons and tags, are small bits of text that are stored on browsers or devices by websites, apps, online media and advertisements. We use cookies and similar tracking technologies for purposes such as: authenticating Users, remembering Users' preferences and settings, and understanding the behaviors and interests of Users who interact with or use the site or Tilt Services.

Note that some content or applications, including advertisements, on the Site may be served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use the Site. The information they collect may be associated with your Personal Information or they may collect information, including Personal Information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

### **A. Website Analytics**

We use third-party software tools on our Site to learn more about how visitors navigate the Site and view content. These third-party analytics providers provide us with analytical information collected through the Cookies that we use to improve the Site, to make sure it is easy to use, and to develop content that is both interesting and customized.

- **Google Analytics:** We have enabled Google Analytics. We use this analytics information to evaluate the use of the Site, compile reports on Site activity, and for our use and for providing other services relating to activity on and use of the Site. To prevent Google from using data collected by Google Analytics, follow the instructions to download and install the [Google Analytics Opt-out Browser Add-on](#) for each web browser you use. Using the Google Analytics opt-out browser add-on will not prevent us from using other analytics tools and will not prevent data from being sent to the Site itself or to Google. Opting out will not affect your use of the Site. For more information on how Google uses Personal Information, visit [Google's Privacy Policy](#) and Google's page on [How Google uses data when you use their partners' websites or apps](#).
- **LinkedIn Analytics:** We have enabled LinkedIn Analytics. We use this analytics information to evaluate the use of the Site, compile reports on Site activity, and for our use and for providing other services relating to activity on and use of the Site. To learn more about LinkedIn's privacy practices, please refer to their privacy policy, available [here](#).

- **Hotjar:** We use Hotjar in order to better understand our users' needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users' experience and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behavior and their devices. This includes a device's IP address (processed during your session and stored in a de-identified form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), and the preferred language used to display our website. Hotjar stores this information on our behalf in a pseudonymized user profile. For further details, please see [Privacy | Hotjar](#).

## B. Targeted Advertising

We use service providers and other third parties to serve you customized email, SMS, and internet-based advertisements. Those ad networks use Cookies and other tracking technologies to serve ads based on your prior visits to our Site. These ad networks may place and store cookies on the devices you use to access our Services and collect information, including your browsing behavior, referring websites, and your response to advertisements.

- **LinkedIn Ads:** We use LinkedIn Ads to display search advertisements and to track when you have visited or used our Services. If you click on a LinkedIn Ads advertisement, LinkedIn Ads stores a cookie on your device that is used to track the number of individuals who click on a LinkedIn Ads advertisement and are forwarded to the applicable website. To learn more about LinkedIn's privacy practices, please refer to their privacy policy, available [here](#). LinkedIn allows you to opt out of tracking associated with LinkedIn Ads. You may opt-out [here](#) or [here](#).
- **Facebook Pixel:** Facebook Pixel by Meta is a Cookie that enables us to measure the effectiveness of advertising campaigns served on Facebook. The information collected by that Cookie will be transmitted to and stored by Facebook. For more information about Facebook's privacy practices, please refer to <https://www.facebook.com/about/privacy/>. To opt out, please see <https://www.facebook.com/ads/preferences>.
- **Google Ads:** We may use Google Ads, an online advertising service provided by Google to serve targeted advertisements on our behalf across the Internet. To opt out of remarketing advertising provided through Google, to customize your ad preferences, or to limit Google's collection or use of this information, visit Google's Safety Center, available at <https://safety.google>, and Google's Ad Settings, available at <https://myadcenter.google.com>. Opting out will not affect your use of the Platform.
- **HubSpot Ads Pixel:** We use HubSpot's analytics services. HubSpot collects customer data and browser behavior from our Services to optimize our ad targeting experience. HubSpot's services help track our ads' impact on our Website and allows us to receive insights from our visitors and their Website behavior. To learn more, please visit HubSpot Privacy Policy.

## 7. How do we use your Personal Information?

Tilt processes personal information for the following business and commercial purposes:

- Providing our websites and Tilt Services: In reliance on our legitimate interest, we process your personal information to operate and administer our websites, and to provide, operate, and maintain the Tilt Services;
- Communicating with you about the Tilt Services: We may send you service, technical, and other administrative email, messages and other types of notifications (such as distribution and product updates and product patches and fixes) in reliance on our legitimate interest in administering the Tilt Services and providing certain features. These communications are considered part of the Tilt Services and in most cases you cannot opt out of them. If an opt-out is available, you will find that option within the communication itself;
- Providing necessary functionality: We process your personal information in reliance on our legitimate interest to provide you with the necessary functionality required during your use of our websites and Tilt Services;
- Transactional considerations: We process your personal information to complete transactions and send you related information, including purchase confirmations and invoices, to perform our contract with you and to the extent necessary in reliance on our legitimate interest;
- Handling contact and support requests: If you use the “Schedule a Demo” web form or request support as a User, or if you contact us by other means including via email, we process your Personal Information to perform our contract with you and/or (if we have not entered into a contract with you) to the extent it is necessary for our legitimate interest in fulfilling your requests and communicating with you;
- Administering Events: We process your personal information to plan and host events or webinars for which you have registered or that you attend;
- Developing and improving the Tilt websites and Services: We process your Personal Information to analyze trends and to track your usage of and interactions with our websites, marketing activities, and Tilt Services to the extent it is necessary for our legitimate interest in developing, improving, and troubleshooting our websites, marketing activities, and the Tilt Services and providing you with more relevant content and service offerings, or where necessary, in reliance on your consent;
- Developing and improving our websites and our marketing, sales, and research activities: We process your Personal Information to analyze trends and to track your usage of and interactions with our websites and engagement with our marketing, sales, and research activities to the extent doing so is necessary for our legitimate interest in developing, improving, and troubleshooting the same. This may include analyzing your usage and interactions using AI-powered tools. We may also process your Personal Information to the extent that doing so is necessary for our legitimate interest in providing you with more relevant content and service offerings or, where necessary, in reliance on your consent.
- Sending marketing communications: We will process your Personal Information for marketing purposes in accordance with your preferences, such as to communicate with you via email or SMS about services, features, surveys, newsletters, promotions, or events we think may be of interest to you and/or to provide other news or information about Tilt and/or our select partners, in each case in reliance on our legitimate interest in conducting direct marketing or, where

necessary, with your consent. Please see the “Your Privacy Rights” section, below, to learn how you can control the processing of your Personal Information by Tilt for marketing purposes;

- Legitimate interests: To the extent necessary for our legitimate interests in promoting the safety and security of our websites and services, we use your Personal Information to investigate and prevent fraudulent transactions, unauthorized access to the websites and Tilt Services, and other illegal activities;
- Business purposes: For our business purposes, such as data analysis, audits, fraud monitoring and prevention, developing new products and features, enhancing, improving, or modifying our products and services, identifying usage trends, and expanding our business activities in reliance on our legitimate interests;
- Complying with legal obligations: We process your Personal Information when cooperating with public and government authorities, courts or regulators in accordance with our legal obligations under applicable laws to the extent this requires the processing or disclosure of Personal Information to protect our rights or is necessary for our legitimate interest in protecting against misuse or abuse of our websites, the Tilt Services, protecting personal property or safety, pursuing remedies available to us and limiting our damages, complying with judicial proceedings, court orders or legal processes or to respond to lawful requests;
- Reviewing compliance with applicable usage terms: We process your Personal Information to review compliance with our contract with you or your organization (where applicable) to the extent that it is in our legitimate interest to ensure adherence to the relevant terms; and
- Other purposes: We will process your Personal Information for other purposes about which we notify you in advance, or for which we receive your consent.

## **8. What Information We Share or Disclose to Others**

Tilt will not share Personal Information, or otherwise make your Personal Information available to any other parties except as provided in this Privacy Policy. Parties with whom we may share your Personal Information, pursuant to any applicable agreements, include:

- Event Co-Sponsors: If you sign up for an event or content that is co-hosted by Tilt and one of its partners or co-sponsors, your Personal Information may be shared with that partner or co-sponsor. Please see our partner or co-sponsors’ privacy policies for further information about how they use Personal Information.
- Legal or Regulatory Bodies and Agencies: Tilt will share your information, including Personal Information, in order to respond to investigations, court orders, legal processes, or to investigate prevent or take action regarding illegal activities, suspected fraud, or situations involving potential threats to the physical safety of any person, violations of Tilt’s Terms of Service, or as otherwise required by law. If Tilt is required by law or an order of a court of competent jurisdiction to disclose your information, Tilt will promptly notify you of this requirement, if permitted by the court or applicable law, so that you may seek a protective order or other appropriate relief.
- Service Providers: In order to provide our websites, the Tilt Services to you and undertake our marketing and business activities, it may be necessary for us to disclose your information to contracted third parties and service provider partners who perform certain functions on our behalf. Examples include payment providers (to authorize, record, settle and clear payment card

transactions); cloud hosting providers (to provide data storage and processing services); communications providers (to process new queries, manage our emails, and provide other communication channels between you and Tilt); and analytics companies to perform analysis. These third-party service providers or vendors may use data we provide to them only as instructed by Tilt.

- **Business Transfers:** If Tilt is involved in a merger, acquisition, or sale of all or apportion of its assets, Personal Information may be transferred to the acquiring person or entity, in which case you will be notified via email and/or a prominent notice on our website of any such change in ownership or uses of Personal Information, as well as any choices you may have regarding your Personal Information.
- **Advertising Partners:** We may partner with third party advertising networks, exchanges, and social media platforms to display advertising on our websites or to manage and service advertising on other sites and we may share Personal Information with them for this purpose. Please see the “Website Analytics, Cookies and Tracking Technology” section, above, for further information.

## **9. How We Protect Your Information**

Your Personal Information is important to us. Tilt maintains a comprehensive written information security program that complies with applicable law and generally accepted industry standards. Our program includes appropriate administrative, technical, and physical safeguards, and procedures and practices to protect Personal Information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, however, is 100% secure. Therefore, we cannot guarantee its absolute security. If you have any questions about security on our website, the Tilt web application owned and operated by Tilt, or the Tilt Services, please contact us using the contact information below.

## **10. Use by Children**

The Tilt Services and site are not intended for use by persons under the age of 16 in the United States (or under the age of majority in Canada, as applicable). We do not seek or knowingly collect Personal Information from individuals under the age of 16, and we request that such individuals not provide such information. If you are under 16 and a resident of the United States (or under the age of majority in your respective Canadian jurisdiction), you may not use either the Tilt Services or Site. If we learn we have collected or received Personal Information from a child under the age of 16, we will take reasonable measures to promptly delete such information from our systems.

## **11. Data Retention**

We will retain your Personal Information for as long as is necessary to fulfill the services that you have requested, comply with any laws or regulations, resolve disputes, and/or enforce our agreements, unless we receive a verified request under an applicable privacy law for earlier deletion of such Personal Information. Where permitted under applicable law, Tilt may retain your data longer for a legitimate business interest where business benefit is not outweighed by your personal rights and freedoms. Data

entered into the Tilt Services and processed on behalf of our Customers as a service provider or processor is retained in accordance with any applicable agreement between Tilt and its Customer.

## **12. De-Identified/Aggregated Data**

We may aggregate or de-identify Personal Information we collect through our website and when operating our business. Once information or data has been de-identified and/or aggregated, such information is no longer Personal Information. Tilt may use or share such de-identified or aggregated data for any legal purpose at its sole discretion.

## **13. Social Media and Plug-Ins**

Our online Services may use social media plug-ins (e.g., the Facebook “Like” button and “Share to Twitter” button) to enable you to easily interact with certain social media websites (e.g., Facebook, Twitter, Instagram) and share information with others. When you visit our online Services, the operators of the available social media plugins can place a cookie on your device, enabling such operators to recognize individuals who have previously visited our online Services. If you are logged into these social media websites while visiting our online Services, the social media plugins allow the relevant social media website to receive information that you have visited our online Services or other information.

The social media plugins also allow the applicable social media website to share information about your activities with our online Services with other users of the social media website. For example, Facebook Social Plugins allow Facebook to show your “Likes” and comments on our online Services to your Facebook friends. Facebook Social Plugins also allow you to see your friends’ Facebook activity on our online Services. We do not control any of the content from the social media plugins. We may also interact with you on social media platforms. If you contact us on one of our social media platforms, request Services, or otherwise communicate directly with us on social media, we may contact you to interact with you. For more information about social media advertising and social media plugins from other social media websites, please refer to those website’s privacy and data-sharing statements.

We use the YouTube application programming interface (API) services to allow you to access YouTube content from our Services. Your use of YouTube is governed by YouTube’s Terms of Services and Privacy Policy. We encourage you to read the YouTube Terms of Service and Privacy Policy, which are available on its website at <https://www.youtube.com/t/terms>.

## **14. Your Consumer Privacy Choices**

- **Update your Personal Information.** You may update your Personal Information by contacting us using the information in the “Contact Us” section below or by contacting us at [legal@hellotilt.com](mailto:legal@hellotilt.com).
- **Delete Your Account.** If you no longer wish to use the Services or access your account or account information, you may request us to delete your account by contacting us at [legal@hellotilt.com](mailto:legal@hellotilt.com). This will result in the full, permanent deletion of your account and associated information. We will not be able to recover your account after it has been deleted.
- **Update Your Browser Settings.** If you wish to limit or opt out of third-party advertising, you can do one or more of the following:

- o The Options/Settings section of most internet browsers will tell you how to manage cookies and other technologies that may be uploaded to your device, including how to disable such technologies. You can disable our cookies, or all cookies, through your browser settings, but please note that disabling cookies may impact some of the features of our Website and prevent them from operating as intended. You can learn more about cookies, including how to see what cookies have been uploaded to your device and how to manage and delete them, by visiting [All About Cookies](#).
- **Digital Advertising Preferences.**
  - o You can change your preferences with respect to certain online ads, and to obtain more information about ad networks and online behavioral advertising, visit the [National Advertising Initiative Consumer Opt Out page](#) and the [Digital Advertising Alliance's Consumer Choice Tool](#). Please note that even if you opt out of receiving interest-based advertising, you may still receive advertisements, but they will be more general in nature. In addition, the electronic device you use to visit our Website may offer relevant privacy settings; please see the device settings for details.
- **Global Privacy Control.** You may opt out of the sale or sharing of your Personal Information by broadcasting a Global Privacy Control ("GPC") signal, an opt-out preference signal, using a browser and/or browser extension that supports the GPC signal. If you choose to use the GPC signal, you will need to turn it on for each supported browser or browser extension you use (<https://globalprivacycontrol.org/orgs>).
- **Opt Out of Marketing Messages.** If you sign up to receive marketing communications and materials, you consent to receive such communications at the location or contact information you provide.
  - o **Email.** If you no longer wish to receive email marketing messages from Tilt, you should use the "unsubscribe" option that can be found in each marketing email we send or contact us using the information provided below. Within 10 days of receipt of your unsubscribe request, we will remove you from our distribution list unless you resubscribe.
  - o **Phone.** You may request that we remove you from our telephone marketing list and refrain from sharing your telephone number with third parties by contacting us using the contact information provided below.

## 15. Leaving Our Website And/Or Linking To Third Parties

We strive to ensure that any information you send us is safe. When you leave Tilt's website and go to another linked website, we are not responsible for the content or availability of the linked website. Please be advised that we do not represent either the third party or you if you enter into a transaction on the third-party website. Further, the privacy and security policies of the linked website may differ from those practiced by us. The inclusion of any link does not imply our endorsement of any other company, its website(s), or its product(s) and/or services(s). We are not responsible for the privacy practices or content of any other website.

## **16. Your State and Country Specific Privacy Rights**

### **A. State-Specific Privacy Rights (United States)**

If you are a Texas or Nebraska resident, applicable state law provides you with certain rights regarding your Personal Information or Personal Data. These rights are subject to limitations such as (a) exceptions permitted by applicable law and (b) verification of your identity. This section provides a summary of your privacy rights and explains how to request to exercise those rights with us.

In the event of a conflict between this Section and the remainder of this Policy, this Section shall govern for residents of Texas and Nebraska. Certain capitalized terms not defined in this Policy have the meaning set forth in the Texas Data Privacy and Security Act (“TDPSA”) or the Nebraska Data Privacy Act (“NDPA”).

### **B. Your Privacy Rights**

#### **1) Right to Opt Out**

Texas and Nebraska residents may request us not to Sell or Share your Personal Information.

Honoring Opt-Out Preference Signals. Texas and Nebraska residents may direct us not to process their Personal Information for targeted advertising or “Sell” their Personal Information by enabling the GPC on the browsers or browser extensions that support it. To learn more about the GPC, visit <https://globalprivacycontrol.org>. If you choose to use the GPC, you will need to turn it on for each supported browser or device you use.

You may also submit an opt-out request by:

- Completing our webform at: <https://forms.gle/gTvn72ziqYHsFxS29>
- Emailing us at [legal@hellotilt.com](mailto:legal@hellotilt.com).

#### **2) Right to Access**

Texas and Nebraska residents have the right to confirm whether we are processing their Personal Data and to access such Personal Data.

#### **3) Right to Request Deletion**

Texas and Nebraska residents have the right to request that Tilt delete their Personal Information or Personal Data that we collected from them. We will comply with such requests and direct our service providers to do the same, subject to certain exceptions permitted by applicable law.

#### **4) Right to Correct**

Texas and Nebraska residents have the right to request that we correct their inaccurate Personal Information or Personal Data. If we receive such a request, we will use commercially reasonable efforts to comply. If necessary, we may ask for documentation showing that the Personal Information or Personal Data we maintain is inaccurate.

## 5) Right to Data Portability

Texas and Nebraska residents have the right to request a copy of the Personal Information or Personal Data that we collected from them in a portable and, to the extent technically feasible, readily usable format.

### **B. How to Exercise Your Rights to Access, Delete, Correct, and Data Portability**

To exercise the access, data portability, correct, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Completing our webform at <https://forms.gle/gTvn72ziqYHsFxS29>
- Emailing us at [legal@hellotilt.com](mailto:legal@hellotilt.com).

### **C. Verifiable Consumer Request**

Except when we receive a request to opt out, we cannot respond to your request without sufficient information to allow us to reasonably verify your identity and confirm that the Personal Information or Personal Data is related to you.

When we receive your request to exercise your rights: (a) We will acknowledge receipt of your request; (b) We will try to match the information you provide in making the request with information we already maintain; (c) If required to verify your identity, we may ask you to provide additional information, including Personal Information or Personal Data; (d) We will consider various factors when determining how to verify your identity, such as the sensitivity and value of the data, the risk of harm, and the likelihood of fraud.

We will only use Personal Information or Personal Data provided in a verifiable consumer request to verify the requestor's identity or authority to make the request. If you maintain an account with us, we may use that account to respond to your request and/or verify your identity. If we are unable to verify your identity as required by applicable laws and regulations, we will decline to comply with your request, and let you know why.

### **D. Who Can Exercise Your Rights?**

Only you, or a person that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Information. You may also make a verifiable consumer request on behalf of your minor child.

Texas and Nebraska residents have a right to submit a request to opt out through an authorized agent. You may designate an authorized agent to make a request on your behalf to exercise your rights by doing the following: (1) Provide the authorized agent written permission to do so; (2) Verify your identity. We may deny a request from an authorized agent if we do not have proof that they are authorized by you to act on your behalf. We will not require authorized agents to verify your identity to effectuate an opt-out request. We may deny a request from an authorized agent if we do not have proof that they are authorized by you to act on your behalf.

#### **E. When We Will Respond**

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time, we will inform you of the reason and extension period.

If you have an account with us, we will 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.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. We will not charge a fee to process or respond to your request unless it is excessive, repetitive, or manifestly unfounded.

#### **F. Right to Non-Discrimination**

Texas and Nebraska residents have the right to not receive discriminatory treatment for exercising any of their rights under the TDPSA or NDPA. We do not discriminate against you if you exercise any of your privacy rights described in this Policy.

#### **G. Appeals Process for Texas and Nebraska Residents**

Texas and Nebraska residents have the right to appeal a denied request to exercise your privacy rights. You must submit your appeal within 60 days of your receipt of our denial. You may submit your appeal to us by contacting us at any of the following:

- Emailing us at [legal@hellotilt.com](mailto:legal@hellotilt.com).
- Writing us at:

Career Allies, Inc. d/b/a Tilt  
1281 E Magnolia St., Unit D-B19  
Fort Collins, Colorado 80524

**When We Will Respond.** We will respond to your appeal within 60 days of receipt. When we respond we will include any action taken or not taken, including an explanation of the reason or reasons for the decision.

#### **B. California Residents: Additional Privacy Disclosures**

California's "Shine the Light" Law. Separate from the CCPA, California's "Shine the Light" law permits Users of the Site that are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. We do not disclose your Personal Information to third parties for the purpose of directly marketing their goods or services to you unless you request such disclosure. If you have any questions regarding this policy, or would like to change your preferences, you may contact us at: the address listed above in Section 13 (How to Contact Us).

#### **C. Canadian Residents: Your Canadian Privacy Rights**

**Your Canadian Privacy Rights.** Under Canadian privacy laws you have certain rights to access and correct Personal Information, subject to identity verification requirements and certain exceptions.

**Right to Access.** You have the right to confirm that we hold Personal Information about you, receive an explanation about how we use your Personal Information, and obtain access to your Personal Information.

**Right to Rectification.** You have a right to examine and challenge the accuracy and completeness of your Personal Information, and have your Personal Information amended where appropriate.

**Right to Withdraw Your Consent.** You have the right to withdraw your consent to processing your Personal Information at any time, subject to legal or contractual restrictions and reasonable notice. If your withdrawal of consent implicates the quality of our Services to you, we will notify you.

**Right to Complain to a Data Protection Authority.** You also have the right to lodge a complaint regarding the processing of your Personal Information with the applicable data protection authority. Please contact your local data protection authority for more information.

**How to Exercise Your Rights.** To exercise your rights described in this Section, you may submit your request to us by contacting us using the contact information listed below.

### **Data Transfers and Consent To Processing Outside of Canada or Quebec**

We are based in the United States. We may transfer your Personal Information to the United States in connection with the operation of our business.

To assist us in meeting our operational and legal obligations, we may also transfer or make your Personal Information accessible to one of our service providers located either in Canada (both inside and outside Quebec) or throughout the world.

When we transfer your Personal Information outside of Canada, your Personal Information may be available to government officials in the United States or other countries. These countries have privacy laws that differ from Canadian privacy laws.

### **Additional Terms Applicable to Quebec Residents Only**

If you are a resident of Quebec, Quebec law provides you with additional rights regarding the use of your Personal Information, subject to identity verification requirements and certain exceptions.

**Right to Restriction of Processing.** You have a right to direct us to cease disseminating your Personal Information or to de-index any hyperlink attached to your name that provides access to the information by a technological means, if the dissemination of the information contravenes the law or a court order.

**Right to Request Deletion.** You have a right to request that we delete Personal Information we collected from you. We will comply with such requests, and direct our Service providers to do the same, subject to certain exceptions permitted by applicable law.

**Right to Portability.** You may request copies of the Personal Information you have provided to us. Where possible, we will deliver the copy of your Personal Information to you using a structured, commonly used, and machine-readable format. Alternatively, you may request that we send your Personal Information to another business.

Translations. This Privacy Statement may be provided in several languages. In the event of conflict or inconsistency, the English language version of this Privacy Statement controls, unless otherwise required by applicable law. En cas de conflit ou d'incohérence, la version anglaise de cette politique de confidentialité contrôle, sauf si la loi applicable l'exige.

How to Exercise Your Rights. To exercise your rights described in this Section, you may submit your request to us by contacting us using the information below.

## **17. How to Contact Us**

You can exercise your rights yourself or depending on your country or state, you may be able to designate an authorized agent to exercise these rights on your behalf. Please note that to protect your personal information, we will verify your identity by a method appropriate to the type of request you are making. For example, this could include sending an email to an account on record, or asking you to identify a recent communication. We may also request that your authorized agent sign a declaration under the penalty of perjury attesting to their designation as your authorized agent, and that they have written permission from you to make requests on your behalf. We may also need to verify your authorized agent's identity to protect your personal information.

Please use the contact details below if you would like to:

- Access this policy in an alternative format;
- Exercise your rights;
- Learn more about your rights or our privacy practices;
- Designate an authorized agent to make a request on your behalf; or

For questions related to this Privacy Policy, or about any of your rights.

E-Mail: [legal@hellotilt.com](mailto:legal@hellotilt.com)

Alternatively, you can write to us at:

Career Allies, Inc. d/b/a Tilt  
1281 E Magnolia St., Unit D-B19  
Fort Collins, Colorado 80524  
USA

To contact Tilt's Data Protection Officer, please email [security@hellotilt.com](mailto:security@hellotilt.com).

## **18. Updates to this Privacy Policy**

We may modify this Privacy Policy from time to time in our sole discretion without prior notice to you. The most current version of the Privacy Policy will govern our collection, use, and disclosure of information about you. You are responsible for ensuring we have an up-to-date, active, and deliverable email address for you, and for periodically reviewing this Privacy Policy for changes. We will indicate at the top of the Privacy Policy when it was most recently updated. Accordingly, please refer to this Privacy Policy frequently as it may change.

If we make material changes to the Privacy Policy which lessen your rights, we will notify you by email and/or by posting a notice through the site prior to or on the effective date of the changes. By continuing to access or use the site and Tilt Services after those changes become effective you agree to the terms of the revised Privacy Policy.