

# Privacy Policy

Last updated: 14 November, 2024

Your privacy is important to us and maintaining your trust is our priority. Poplar Technologies Ltd. (“Breakroom”, “us”, “we”, or “our”) operates the Breakroom website and services (the “Site”). We are committed to protecting your Personal Data through our compliance with this Privacy Policy.

This Privacy Policy describes the types of information we may collect from or about you or that you may provide when you visit or use the Site or otherwise connect with us, and how we use that information. You can download a pdf version of the Privacy Policy [here](#).

## 1. Who we are

The Site is operated and owned by Poplar Technologies, which provides an online people-powered job comparison site.

Poplar Technologies Ltd. t/a Breakroom  
c/o Fieldfisher LLP  
Riverbank House, 2 Swan Lane, London  
EC4R 3TT, England, United Kingdom  
Company No. 11559527

## 2. Key terms

We use certain defined terms that appear in this Privacy Policy:

<b>Non-Personal Data</b>	Data that is not considered Personal Data under applicable law. We reserve the right to treat data as Personal Data or Non-Personal Data based on the law applicable to the data and the data subject.
<b>Personal Data</b>	Any information or pieces of information that could identify you either directly (e.g., your name) or, where required by applicable law, indirectly (e.g., through pseudonymized data, such as a unique ID number). This means that Personal Data includes things like email/home addresses, usernames, and user-generated content. It could also include certain Technical Data (defined below) such as unique numerical identifiers like your computer’s IP address or your mobile device’s MAC address, as well as cookies (“Device IDs”), where required by applicable law.

<b>Special Categories of Personal Data</b>	Sensitive Personal Data that reveals racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership; genetic and biometric data; and data concerning health, sex life or sexual orientation.
<b>ZipRecruiter Group</b>	ZipRecruiter, Inc. and its wholly-owned subsidiaries, including ZipRecruiter UK Ltd., ZipRecruiter Canada Ltd., ZipRecruiter Israel Ltd., and Poplar Technologies Ltd.

### 3. Data we collect about you

#### a. Personal Data

We collect and process different kinds of Personal Data about you. The table below identifies the categories of Personal Data that we process:

<b>CATEGORY OF PERSONAL DATA</b>	<b>EXAMPLES OF PERSONAL DATA WE MAY COLLECT UNDER EACH CATEGORY</b>
<b>Identity Data</b>	First and last name
<b>Contact Data</b>	Email address, telephone number, and any other contact information you provide to us
<b>Technical Data</b>	IP address, Device IDs, browser type and version, device information, cookie data, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the Site
<b>Profile Data</b>	Your username, age, preferences, and your responses on any quiz, feedback, or other survey
<b>Professional or Employment-Related Information</b>	Job searches, job applications (including answers to any screening questions), resume/CV (including any information contained therein), work experience, education, and your application status
<b>Business Information</b>	Job title, company name, company location, number of employees at the company, company videos, and other company-level data
<b>Usage Data</b>	Information about how you use our Site, products and services, such as when you login, and Site access dates and times.

CATEGORY OF PERSONAL DATA	EXAMPLES OF PERSONAL DATA WE MAY COLLECT UNDER EACH CATEGORY
<b>Marketing and Communications Data</b>	Your preferences in receiving marketing and other communications from us

## b. Non-Personal Data

We also collect, use and share “Aggregated Data” (where data has been combined or collected in a summary or other form that cannot identify an individual) or “De-Identified Data” (where Personal Data points have been removed so that the remaining data cannot reasonably be linked to an identifiable individual) for any purpose. Aggregated Data and De-Identified Data may each be derived from Personal Data but are not considered Personal Data since it does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Site feature.

## c. If you fail to provide Personal Data where required

Where we need to collect Personal Data by law, or under the terms of a contract we have with you, or a prospective contract, and you fail to provide that Personal Data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our services). If so, we may have to cancel the service you have with us (or have requested from us), and you accept that as a condition of service.

## d. Data that you should not provide to us

We do not require any Special Categories of Personal Data about you in order for you to utilise the Site. If you share your CV/resume with a prospective employer directly using a job application feature on the Site, please carefully consider the information that is contained within your CV/resume, or in any answers to screening questions, and ensure that you are not providing any sensitive or other information that is not necessary for such job application.

# 4. How do we collect your information?

We use different methods to collect Personal Data from and about you, as described below.

## a. Direct interaction

You may give us certain Personal Data when you fill out forms on the Site or correspond with us. This includes Personal Data you provide when you:

- Take our quiz or answer a survey

- Join Breakroom by creating an account
- Sign into Breakroom, including with your Google or Facebook account
- Search for jobs
- Sign up for email job matches
- Save a job
- Save a search query

## b. Automated Technologies or Interactions

As you interact with the Site, we automatically collect Technical Data and Usage Data about your equipment, standard internet log information, and details of visitor behaviour patterns. We do this to find out things, such as the number of visitors to the various parts of the Site. In such cases, we do not make any attempt to find out the identities of those visiting the Site.

We collect this Personal Data and Non-Personal Data by using cookies, server logs and other similar technologies. For more information, please refer to “Cookies and Tracking Technologies” below.

## c. Third Parties

We may receive Personal Data in the form of Technical Data and Usage Data about you from various third parties, such as analytics providers or advertising networks.

For non-users that operate in or work at a business (“Prospective Business Customers”), we also receive Business Information and Contact Data from third-party sources.

# 5. How we use your data

## a. Use of Non-Personal Data

Where permitted by applicable law, we may use your Non-Personal Data for any purpose not prohibited by applicable law or inconsistent with this Privacy Policy or any written representation we have made to you at the point and time of the data collection.

## b. Use of Personal Data

We will only use your Personal Data where permitted by law. Most commonly, we will use your Personal Data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.
- Where you have given us your consent.

### c. Purposes for which we use your Personal Data

In the table below, we have described (i) in what context your Personal Data was collected, i.e., what activity you were involved in when we collected or used your Personal Data; (ii) the types of Personal Data that we hold about you; (iii) how and why we use your Personal Data; and (iv) what our legal basis is for using your Personal Data. We will amend the table from time to time as we offer additional products or services or otherwise as required to comply with applicable law. We have also identified what our legitimate interests are where appropriate. We have provided you with an explanation of some of the terms we use in this table:

- i. **'Legitimate Interest'** means our interest in conducting and managing our business, to enable us to give you the best experience when using the Site, products, and services. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Data for our legitimate interests. We do not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- ii. **'Performance of Contract'** means processing your Personal Data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- iii. **'Comply with a legal or regulatory obligation'** means processing your Personal Data where it is necessary for compliance with a legal or regulatory obligation to which we are subject.
- iv. **'Consent'** means that you consent to our use of your Personal Data for one or more specific purposes. Where we rely on your consent to use your Personal Data, you have the right to withdraw that consent at any time. You can do this by contacting us at [hello@breakroom.cc](mailto:hello@breakroom.cc). However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

CONTEXT IN WHICH YOUR PERSONAL DATA IS COLLECTED	WHAT CATEGORIES OF PERSONAL DATA WE MAY HOLD ABOUT YOU	HOW WE MAY USE YOUR PERSONAL DATA	OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA
Taking the Breakroom	<ul style="list-style-type: none"> <li>• Profile Data</li> </ul>	<ul style="list-style-type: none"> <li>• To provide you with a</li> </ul>	<ul style="list-style-type: none"> <li>• For our legitimate interests</li> </ul>

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<b>quiz</b>	<ul style="list-style-type: none"> <li>Professional or Employment-Related information</li> </ul>	Breakroom rating for your job <ul style="list-style-type: none"> <li>To contribute to an aggregated Breakroom rating</li> </ul>	in: (i) providing our Site, products and services to you; and (ii) optimising and improving the provision of the Site, services and products <ul style="list-style-type: none"> <li>To perform our contract with you</li> </ul>
<b>Job seeker account creation and management</b>	<ul style="list-style-type: none"> <li>Identity Data</li> <li>Contact Data</li> <li>Technical Data</li> <li>Profile Data</li> <li>Professional or Employment-Related Information</li> </ul>	<ul style="list-style-type: none"> <li>To create and manage your account</li> <li>To help you build your profile during account creation</li> <li>To communicate with you about your account</li> <li>To manage our relationship with you</li> <li>To provide personalised offerings and job matches based on your preferences</li> <li>To allow you to view the jobs you've applied to on the Site</li> </ul>	<ul style="list-style-type: none"> <li>To perform our contract with you so you can create your account and use our Site</li> <li>For our legitimate interests in: (i) providing our Site, products and services to you; (ii) optimising and improving the provision of the Site, services and products; (iii) better engaging with you; and (iv) securing our Site, including mitigating or preventing fraud</li> </ul>
<b>Employer account creation and management</b>	<ul style="list-style-type: none"> <li>Identity Data</li> <li>Contact Data</li> <li>Technical Data</li> <li>Profile Data</li> <li>Business information</li> </ul>	<ul style="list-style-type: none"> <li>To create and manage your account</li> <li>To communicate with you about your account</li> <li>To manage our relationship with you</li> <li>To provide personalised offerings based on your preferences</li> </ul>	<ul style="list-style-type: none"> <li>To perform our contract with you so you can create your account and use our Site</li> <li>For our legitimate interests in: (i) providing our Site, products and services to you; (ii) optimising and improving the provision of the Site, services and products; (iii) better engaging with you; and (iv) securing our Site, including mitigating or preventing fraud</li> </ul>
<b>Searching for jobs</b>	<ul style="list-style-type: none"> <li>Technical Data</li> <li>Professional or Employment-Related Information</li> <li>Business Information</li> </ul>	<ul style="list-style-type: none"> <li>To customise our services for you based upon your activity on the Site, (including, if you are a job seeker your preferences for certain skill sets or certain jobs)</li> </ul>	<ul style="list-style-type: none"> <li>To perform our contract with you so you can use our Site</li> <li>For our legitimate interests in: (i) providing our Site, products and services to you; (ii) optimising and improving the provision of the Site, services and products; (iii) better engaging with you; and (iv) securing our Site, including mitigating or preventing fraud</li> </ul>

CONTEXT IN WHICH YOUR PERSONAL DATA IS COLLECTED	WHAT CATEGORIES OF PERSONAL DATA WE MAY HOLD ABOUT YOU	HOW WE MAY USE YOUR PERSONAL DATA	OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA
<b>Email job alerts</b>	<ul style="list-style-type: none"> <li>● Identity Data</li> <li>● Contact Data</li> <li>● Usage Data</li> <li>● Marketing and Communications Data</li> </ul>	<ul style="list-style-type: none"> <li>● To send you email job matches and alerts, if you registered to receive job alerts</li> <li>● To run analytics or collect statistics</li> <li>● To communicate with you regarding our services</li> <li>● To manage your email settings</li> </ul>	<ul style="list-style-type: none"> <li>● Consent – so you can receive job alert emails</li> <li>● Our legitimate interests to: (i) provide you with the services and products you have requested; (ii) optimising and improving the provision of the Site, services and products; (iii) better engaging with you; and (iv) helping us monitor and improve our alerts.</li> </ul>
<b>Other newsletter and marketing communications</b>	<ul style="list-style-type: none"> <li>● Identity Data</li> <li>● Contact Data</li> <li>● Usage Data</li> <li>● Marketing and Communications Data</li> </ul>	<ul style="list-style-type: none"> <li>● To send you marketing communications (where you have asked us to) which may be of interest to you</li> <li>● To include or exclude you from social media marketing campaigns</li> <li>● To manage your communication settings</li> </ul>	<ul style="list-style-type: none"> <li>● Consent – so you can receive newsletters, and information about products and services that may be of interest to you</li> <li>● Our legitimate interests to: (i) provide you with the services and products you have requested; (ii) optimising and improving the provision of the Site, services and products; (iii) better engaging with you; and (iv) helping us monitor and improve our newsletters and other marketing communications.</li> </ul>
<b>Site administration</b>	<ul style="list-style-type: none"> <li>● Identity Data</li> <li>● Contact Data</li> <li>● Business Information</li> <li>● Technical Data</li> <li>● Usage Data</li> </ul>	<ul style="list-style-type: none"> <li>● To provide administration and IT services, network security, to prevent fraud</li> <li>● To troubleshoot</li> <li>● To perform data analysis, testing, system maintenance, support, reporting and hosting of data</li> <li>● To run analytics or collect statistics</li> <li>● To monitor and improve our Site</li> </ul>	<ul style="list-style-type: none"> <li>● For our legitimate interests in: (i) providing our Site, products and services to you; (ii) optimising and improving the provision of the Site, services and products; and (iii) securing our Site, including mitigating or preventing fraud</li> <li>● To perform our contract with you and provide services to you</li> </ul>
<b>Using the Site</b>	<ul style="list-style-type: none"> <li>● Identity Data</li> <li>● Contact Data</li> <li>● Usage Data</li> <li>● Profile Data</li> <li>● Business Information</li> </ul>	<ul style="list-style-type: none"> <li>● To improve the Site</li> <li>● To analyse your use of the Site, including your preferences, and to tailor content to you</li> <li>● To provide you with the</li> </ul>	<ul style="list-style-type: none"> <li>● Consent – to provide you with the service you have requested</li> <li>● For our legitimate interests in: (i) providing our Site, products and services to</li> </ul>

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	<ul style="list-style-type: none"> <li>• Technical Data</li> </ul>	<p>service(s) you requested such as sending your job application, sending you CVs, posting your job ad, and providing you with products that you've requested</p> <ul style="list-style-type: none"> <li>• To run analytics and statistics, including aggregation of Usage Data</li> </ul>	<p>you; (ii) optimising and improving the provision of the Site, services and products; and (iii) securing our Site, including mitigating or preventing fraud</p>
<p><b>Online browsing</b> (including where your Personal Data may be collected by cookies or similar technologies and data analytics)</p>	<ul style="list-style-type: none"> <li>• Usage Data</li> <li>• Technical Data</li> </ul>	<ul style="list-style-type: none"> <li>• To improve our Site, products, services and your user experience</li> <li>• To run analytics and collect statistics</li> <li>• To enable our Site to function properly (ensure proper display of content); create and remember your account login details; interface personalization, such as language, or any user-interface customization (i.e. parameters attached to your device including your screen resolution or font preference), etc.</li> <li>• To understand how you arrived at our Website</li> </ul>	<ul style="list-style-type: none"> <li>• Consent – to provide you with the service you have requested, including to store cookies and similar technologies on your device</li> <li>• For our legitimate interests in: (i) providing our Site, products and services to you; (ii) optimising and improving the provision of the Site, services and products; and (iii) securing our Site, including mitigating or preventing fraud</li> </ul>
<p><b>Submission of user-generated content</b> (such as reviews, profiles, CVs and job ads)</p>	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Usage Data</li> <li>• Profile Data</li> <li>• Business Information</li> <li>• Technical Data</li> </ul>	<ul style="list-style-type: none"> <li>• To send your CV to the employer whose job ad you applied to or to send you CVs of candidates that appear to have the skill set in your job ad</li> <li>• To send you job alert emails where you have opted to receive them directly from us</li> <li>• To display your Job Ad on our Site to facilitate viewing by job seekers</li> <li>• To allow for anonymous reviews or ratings to be posted about your employer</li> <li>• To run analytics and statistics</li> </ul>	<ul style="list-style-type: none"> <li>• Consent – to provide you with the services you have requested, including, but not limited to, posting your job ad, facilitating your job application, and/or distributing your reviews or other content in accordance with any contract we have with you</li> <li>• For our legitimate interests in: (i) providing our Site, products and services to you; (ii) optimising and improving the provision of the Site, services and products, including securing our tools and designing new features; and (iii) securing our Site, including mitigating or preventing fraud</li> <li>• Performance of our contract</li> </ul>



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			with you
<b>Enquiries and communications initiated by you</b> (Where your Personal Data is collected when you ask questions relating to our Site, services and/or your account)	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Profile Data</li> <li>• Business Information</li> <li>• Technical Data</li> <li>• Usage such as content of chats, messages, or enquiries; number of messages you've sent and received; when you viewed a message; who responded to your chats</li> </ul>	<ul style="list-style-type: none"> <li>• To respond to and manage your questions, inquiries and communications</li> <li>• To run analytics and statistics</li> <li>• To troubleshoot any problems that you are experiencing</li> </ul>	<ul style="list-style-type: none"> <li>• For our legitimate interests in: (i) responding to any enquiries or messages from you; (ii) fulfilling any requests related to your communication with us; and (iii) securing our Site, including mitigating or preventing fraud</li> <li>• Where we need to comply with a legal or regulatory obligation (for example, data subject rights)</li> </ul>
<b>Reaching out to Prospective Business Customers</b>	<ul style="list-style-type: none"> <li>• Contact Data</li> <li>• Business Information</li> </ul>	<ul style="list-style-type: none"> <li>• To identify Prospective Customers and send marketing materials where permissible by law</li> </ul>	<ul style="list-style-type: none"> <li>• For our legitimate interests in our direct marketing to Prospective Customers</li> </ul>

## d. Automated Decision-Making

We use certain types of automated processing to help improve our Site, products and services to you. For example, we may use automated technologies to send you job alert emails regarding roles that may be of interest to you based upon your profile or search criteria (if you have consented to receive job alert emails), show you jobs that may be of interest to you based on your searches while you are using our Site, and/or show you jobs based upon your application history or CV. Our Site, however, does not include any form of automated decision-making.

## 6. How and where do we store your information?

We will take all steps reasonably necessary to ensure that your data is treated and stored securely and in accordance with applicable data privacy law.

We only keep your personal data for as long as we need to in order to use it as described above, and/or for as long as we have your permission to keep it.

It is important to remember that the transmission of information via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting to us information via the internet.

## 7. How we share or disclose your data

We require third parties to respect the privacy of your Personal Data and to treat it in accordance with the law. We explain in more detail below how we may share or disclose your Personal Data.

### a. Disclosures of Personal Data at your direction

We disclose your Personal Data when you intentionally interact with third parties and when you direct us or intentionally use us to share your Personal Data in connection with the services that we provide to you.

For example, if you are a job seeker, we will share your Personal Data as follows:

- If you apply to a job posting on our Site, we will share your Identity Data, Contact Data, and Professional or Employment-Related Information with the prospective employer and/or their agent of the job to which you applied.
- For any other purpose authorised by you when you provide us with the information or otherwise choose to participate in new features and functions available through the Site.

### b. Disclosures of Personal Data for a business need or other purpose

We describe in detail below the other ways in which we may share or disclose Personal Data with third parties:

#### Internal parties

- **With the ZipRecruiter Group:** We are part of the ZipRecruiter Group, so we may disclose your Personal Data to companies within our corporate family that comprise the ZipRecruiter Group. Access to your Personal Data will be controlled and only granted where necessary to provide our services to you and/or to allow us to perform any necessary or legitimate functions.

#### External parties

- **Service providers, vendors and contractors:** We may disclose your Personal Data to service providers, vendors, or independent contractors that we use to support our business and/or help provide our services to you, including, but not limited to, third-parties that host our Site, perform Site and platform maintenance, perform data and web analytics, provide databases, IT services, customer service, communication services, and email services. We may use the services of these other companies in

relation to our Site, but they will have access to your Personal Data only to perform tasks on our behalf and be subject to contractual obligations to do so.

- **Advertising partners or advertising networks:** We may disclose certain Personal Data about you that is collected through cookies and other tracking technologies. For example, we may use Meta, TikTok, Snapchat, and/or other third party advertising platforms, as part of our marketing. They cannot access any personal details you share with Breakroom, but they may be able to see your Technical Data and Usage Data in order to know if and when to show you adverts, or to track conversions or other analytics.
- **Professional advisors:** We may disclose your Personal Data to professional advisers such as lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance, financial, auditing, and accounting services to us so we can operate our business.
- **Government entities or otherwise as required by law:** We may disclose Personal Data to law enforcement agencies, courts, supervisory authorities, regulatory bodies and certain other third-parties, to the extent that we are permitted or required to do so by law, or in order to comply with our legal and regulatory obligations, or in the interests of national security, or to respond to verified requests relating to a criminal investigation or alleged or suspected illegal activity. We will disclose your Personal Data if we believe that such action is necessary to comply with the law and the reasonable requests of law enforcement or to protect the security or integrity of our Site.
- **Third Parties for purposes of a business transfer:** We may disclose Personal Data in connection with or during negotiations of any proposed or actual financing, merger, purchase, sale, sale or transfer of some or all of our assets or stock, joint venture, or any other type of financing, acquisition or business combination of our company(ies), or all or any portion of our assets, or transfer of all or a portion of our business to another company, including without limitation in the event of a divestiture, restructuring, reorganisation, dissolution or other event, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding. In the event of a merger, divestiture, restructuring, reorganisation, or other sale or transfer of some or all of our assets or stock, Personal Data that we hold about our clients and users of our Site may be one of the assets that will be transferred. We will let you know before your Personal Data is transferred and becomes subject to a different Privacy Policy. If a change happens to our business, the new owners may only use your Personal Data in accordance with this Privacy Policy.
- **Other third parties with your consent:** We may disclose Personal Data to third parties, where you have expressly consented to the disclosure of your Personal Data.

## c. Non-Personal Data

Where permitted by applicable law, we may share your Non-Personal Data for any purpose not prohibited by applicable law or inconsistent with this Privacy Policy or any written representation we have made to you at the point and time of the data collection.

## d. Sale of Personal Data or use for targeted advertising

Your privacy is our priority, and we do not monetize your Personal Data by selling it to third parties.

After you visit our Site, you may receive targeted advertisements about Breakroom when you visit other websites (i.e., social media sites, search engines or other websites that are unrelated to Breakroom) (collectively, “Other Websites”). This happens because we use third-party vendors to provide you with information about Breakroom based upon your interactions with us. We also may place third-party cookies, scripts, and other tracking technologies on our Site to track your interactions with Breakroom ads placed on Other Websites.

These third-party vendors may additionally collect certain Personal Data about you through cookies and other tracking technologies (see our [Cookie policy](#) for more information). These third-party vendors may work with additional downstream providers in their relationship network that assist the third-party vendor in providing the advertising services to us. When this information is disclosed by Breakroom in the manner described above, it may constitute a “sale” or “use for targeted advertising” under applicable privacy laws. We disclose the following categories of Personal Data with third party advertising partners or advertising networks for the purpose of showing you ads about Breakroom:

- Identity Data
- Contact Data
- Transaction Data
- Business Information
- Profile Data

## 8. Where else your information will be held

We may transfer certain Personal Data about you to ZipRecruiter, Inc. located in the United States for some of the purposes listed above. ZipRecruiter, Inc. is certified under the UK Extension to the EU-US Data Privacy Framework and therefore deemed to provide an adequate level of protection for Personal Data under UK data protection law.

## 9. How long your Personal Data will be kept

Different retention periods apply for different types of Personal Data and in determining the appropriate retention period, we consider several criteria, including, but not limited to, the purpose for which we hold your Personal Data, our legal, accounting, reporting and/or regulatory obligations in relation to that Personal Data (e.g., financial or tax reporting obligations), whether our relationship with you is ongoing (e.g., where you use more than one of our products and/or services), any specific request you may have made in relation to the deletion of your Personal Data, or where we have a legitimate interest in relation to the management of our own rights (e.g., the defence of any claims). In some circumstances we may anonymize your Personal Data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Once you no longer have a relationship with us, we will retain or securely delete or destroy your Personal Data subject to the foregoing and in accordance with applicable laws and regulations. If you request to receive no further contact from us, we will keep some basic information about you on our suppression list in order to avoid sending you unwanted materials in the future.

## 10. Your rights

We respect your privacy rights and provide you with reasonable access and rights to the Personal Data that you may have provided through your use of the Site, in accordance with applicable law.

You may have different privacy rights under applicable laws depending on the country you are in when you visit or access our Website.

**For Data Subjects in the United Kingdom or otherwise subject to the GDPR,** you have the following rights with respect to your Personal Data:

<b>YOUR RIGHTS</b>	<b>WHAT CAN YOU REQUEST</b>
Right to <b>Information</b>	The right to know what Personal Data we hold about you and how we use it.
Right to <b>Access</b>	The right to be provided with a copy of your Personal Data (subject to certain restrictions).
Right of <b>Rectification</b>	The right to require us to correct any incomplete or inaccurate Personal Data we hold about you, though we may need to verify the accuracy of the new data you provide to us. If you have a user

YOUR RIGHTS	WHAT CAN YOU REQUEST
	account with us, you also have the option of correcting your information directly in your account.
Right to <b>erasure/be forgotten</b>	This enables you to ask us to delete or remove Personal Data where there is no good reason for us to continue to process it. Note, however, that we may not always be able to comply with your request for erasure and in such circumstances, will notify our reasons to you.
Right to <b>restrict processing</b>	The right to require us to restrict processing of your Personal Data, i.e., you can request that we suspend the processing of your Personal Data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
Right to request <b>data portability</b>	In certain circumstances, you have the right to request the transfer of your Personal Data to you or to a third party in a commonly used machine-readable format. Note, however, that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
Right to <b>object to processing</b>	You have the right to object to the processing of your Personal Data in the following circumstances: (a) at any time to your Personal Data being processed for direct marketing (including profiling); or (b) in certain other situations, to our continued processing of your Personal Data, e.g., our processing of your Personal Data when such processing is based on our legitimate interests. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
Right to <b>withdraw consent</b> at any time	You have the right to withdraw your consent at any time where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent,

YOUR RIGHTS	WHAT CAN YOU REQUEST
	we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
<b>Right not to be subject to a decision based solely on automated decision-making</b>	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you. However, your right does not apply if: (a) you gave us your explicit consent to use your Personal Data to make our decision; (b) we are allowed by law to make our decision; or (c) our automated decision was necessary to enable us to enter into a contract with you.

**For data subjects in the United States:** Depending on applicable law, you may have the following rights with respect to your Personal Data:

YOUR RIGHTS	WHAT CAN YOU REQUEST
Right to <b>Information</b>	The right to know whether we process Personal Data about you and, if so, what Personal Data we hold about you and how we use it.
Right of <b>Access</b>	The right to be provided with a copy of your Personal Data (subject to certain restrictions under applicable law).
Right to <b>Delete</b>	Where required under applicable law, the right to request that we delete your Personal Data (subject to certain restrictions under applicable law).
Right of <b>Rectification/Correction</b>	The right to require us to correct any incomplete or inaccurate Personal Data we hold about you, though we may need to verify the accuracy of the new data you provide to us. If you have a user account with us, you also have the option of correcting your information directly in your account.
Right to <b>Withdraw Consent At Any Time</b>	You have the right to withdraw your consent at any time where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

YOUR RIGHTS	WHAT CAN YOU REQUEST
Right to <b>Opt-Out of Sale/Targeted Advertising</b>	Where required under applicable law, you have the right to opt-out of the sales of your Personal Data or the processing of your Personal Data for purposes of targeted advertising. To submit an opt-out request, you (or your authorised representative) may visit our <a href="#">Your Privacy Choices</a> page.

If you have any complaints about how we handle Personal Data, please send an email to [hello@breakroom.cc](mailto:hello@breakroom.cc). We welcome the opportunity to help you with any concern or questions you may have about the use of our services, and we will respond to your request within a reasonable timeframe.

**For residents located in Nevada:** Nevada residents who wish to exercise their sale opt-out rights under Nevada Revised Statutes Chapter 603A may submit a request to [hello@breakroom.cc](mailto:hello@breakroom.cc). However, please know Breakroom does not currently sell data triggering the opt-out requirements under Nevada Revised Statutes Chapter 603A.

**For residents located in certain U.S. states:** If required under applicable state privacy law, you may also have the right to: (i) opt out of processing of Personal Data for purposes of profiling in furtherance of decisions that produce legal or similarly significant effects (if such profiling occurs); (ii) request a list of third parties with whom we have disclosed personal data; and (iii) appeal any decision by ZipRecruiter, including a decision not to take an action relating to your applicable rights, by sending an email [hello@breakroom.cc](mailto:hello@breakroom.cc).

**a. Method for requesting information pursuant to your rights**

If you would like to exercise any of the data subject rights identified in the table above (each, a "Rights Request"), please send your request in an email to [hello@breakroom.cc](mailto:hello@breakroom.cc).

**b. No fee usually required**

You will not usually be required to pay a fee to exercise your privacy rights. However, we may charge a reasonable fee if your Rights Request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your Rights Request in these circumstances and, in such case, we will notify you within a reasonable timeframe regarding our reasons for refusing to act on your Rights Request.



### c. What we may need from you

Once we receive your Rights Request, we may need to request specific information from you to help us confirm your identity and ensure your right to access or delete your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive or delete it.

If it is not clear as to what you are requesting, we may also need to contact you for clarification so we can more fully respond to your request. If we cannot locate any records about you, we may also ask you for additional information to assist us in locating records, if they exist.

### d. Opt Out of Marketing Communications

You may opt out of receiving any, or all, of our email marketing communications by following the unsubscribe link or instructions provided in any email we send or by contacting us at [hello@breakroom.cc](mailto:hello@breakroom.cc).

## 11. California Privacy Rights

California residents have the right to request certain information regarding our disclosure of personal information (as defined by the California Shine the Light Act) to third parties for their direct marketing purposes unless we provide them with an ability to exercise choice regarding such disclosures. We comply with this law by providing California residents with the ability to opt-out of, or prospectively withdraw their consent, if they have previously opted-in to, the disclosure of Personal Data to third parties for their direct marketing purposes. If you are a California resident, to receive confirmation of how we comply with this law, or to make a request or to opt out at any time, please contact us at [hello@breakroom.cc](mailto:hello@breakroom.cc) or mail us at the address provided in Section 16 below. Any request must include "California Shine the Light Request" in the first line of the description and must include the requestor's name, street address, city, state, and ZIP code.

#### **California Privacy Notice:**

If you are a visitor or user of the Site who resides in the State of California, you can view the Breakroom "California Privacy Notice" by clicking [here](#).

## 12. Cookies and Tracking Technologies

Breakroom and third parties may use cookies or other tracking technologies (e.g., pixels, tags, scripts, etc.) ("Tracking Technologies") to analyse trends, administer the Site, track users'

movements around the Site, to gather information about our user base as a whole, to attribute traffic on our Site to a specific source, or as otherwise described in this Privacy Policy.

You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our Site. For more information about the types of cookies and Tracking Technologies that we, and certain third parties use, why we use them, and how you can control these, please review our [Cookie Policy](#).

## **13. Links to third party websites and social media features**

Our Site may contain links to other third-party services, such as websites, locations, platforms, applications or services that are not operated by us. We use these third party links to support and enhance your experience of the Site.

You should note that clicking on a third party link may direct you to that third party's services. We strongly advise you to review the privacy policy of every site you visit. We have no control over, and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

## **14. Minors and children**

We do not knowingly collect personal data from anyone under 16. If you are a parent or guardian and you are aware that your child has provided us with personal data, please contact us at [hello@breakroom.cc](mailto:hello@breakroom.cc). If we become aware that we have collected personal data from anyone under the age of 16 without verification of parental consent, we will take steps to remove that information from our servers.

## **15. Questions or Complaints**

If you have a complaint, or if you have questions or requests regarding your Personal Data, please email us at [hello@breakroom.cc](mailto:hello@breakroom.cc).

If we are not able to address your concern and if you are located in the EEA, Switzerland, or the U.K., you have the right to lodge a complaint with the Data Protection Authority where you are located or where the issue took place. Contact information for the Information Commissioner's Office (ICO), which is the supervisory authority in the U.K., can be found at <https://ico.org.uk/make-a-complaint>.

## **16. Changes to this Privacy Policy**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

If we make any material changes to this Privacy Policy, you will be notified by placing a prominent notice on our Site, or by displaying the new privacy policy on this page.

## **17. How to contact us**

If you have any questions about this Privacy Policy or our Personal Data practices, please contact us by using one of the communication methods below:

- Email: [hello@breakroom.cc](mailto:hello@breakroom.cc)
- Mailing Address: Poplar Technologies Ltd. t/a Breakroom, c/o Fieldfisher LLP, Riverbank House, 2 Swan Lane, London, EC4R 3TT, England, United Kingdom

Please ensure that your query is clear, particularly if it is a request for information about the Personal Data we hold about you.