

## Privacy Policy

Effective date: October 12, 2021

At Karat, Inc. (“Karat”), we take your privacy seriously. Please read this Privacy Policy to learn how we treat your personal data. **By using or accessing our services, including our websites (i.e., [www.karat.com](http://www.karat.com) and [central.karat.io](http://central.karat.io)) and our interviewing platform or otherwise performing an interview with us (collectively, “Services”), in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent that we will collect, use and share your information as described in this Privacy Policy.**

If you participate in Karat’s interviewing platform or otherwise perform an interview with us, remember that your use of Karat’s Services is always subject to our Job Candidate Interview Agreement, which incorporates this Privacy Policy.

If you have a disability, you may access this Privacy Policy in an alternative format by contacting [privacy@karat.io](mailto:privacy@karat.io).

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### What this Privacy Policy Covers

This Privacy Policy covers how we treat Personal Data that we gather when you access or use our Services. “Personal Data” means any information that identifies or relates to a particular individual and also includes information referred to as “personally identifiable information” or “personal information” under applicable data privacy laws, rules or regulations. This Privacy Policy does not cover the practices of companies we don’t own or control or people we don’t manage.

#### Personal Data

##### *Categories of Personal Data We Collect*

The following charts detail the categories of Personal Data that we collect and have collected over the past 12 months. The Personal Data we collect, and how we share it, depend upon your interactions with us. For example, we collect and share Personal Data differently depending upon whether you visit or interact with a Karat website (i.e. www.karat.com or central.karat.io), in which case you are a “Website Visitor,” or you are a candidate that is participating in our interviewing platform or otherwise performing an interview with us in which case you are a “Candidate.” Note that you can be both a Website Visitor and a Candidate, including, for example, if you are a Candidate that visits www.karat.com.

Candidate Personal Data

The following chart details the Personal Data that we collect and have collected over the past 12 months from Candidates. We may share your Personal Data with the categories of third parties identified in this table. Note that we may share your Personal Data with employers that refer you to Karat in order to provide our services (“Prospective Employers”). **Only if we first obtain your consent**, we may also share your Personal Data with employers that may be interested in your profile (“Interested Employers”) when you elect to participate in certain product features, offerings, and other opportunities with Karat and/or such Interested Employers. **We value your privacy: we will first explain the opportunities and seek to obtain your informed consent to participate before your Personal Data is shared with Interested Employers, and we will not share your Personal Data for such purposes if you do not provide consent.**

<b><u>Candidate Personal Data</u></b>		
<b><u>Category of Personal Data</u></b>	<b><u>Examples of Personal Data We Collect</u></b>	<b><u>Categories of Third Parties With Whom We Share this Personal Data:</u></b>
<b>Profile or Contact Data</b>	<ul style="list-style-type: none"> <li>• First and last name</li> <li>• Email</li> <li>• Phone number</li> <li>• Mailing Address</li> <li>• Pronoun</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Prospective Employers</li> <li>• Interested Employers</li> </ul>
<b>Device/IP Data</b>	<ul style="list-style-type: none"> <li>• IP address</li> <li>• Type of device/operating system/browser used to access the Services</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Analytics Partners</li> </ul>
<b>Web Analytics</b>	<ul style="list-style-type: none"> <li>• Web page interactions</li> <li>• Referring webpage/source through which you accessed the Services</li> <li>• Non-identifiable request IDs</li> <li>• Statistics associated with the interaction between device or browser and the Services</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Analytics Partners</li> </ul>
<b>Social Network Data</b>	<ul style="list-style-type: none"> <li>• Email</li> <li>• Phone number</li> <li>• User name on the social network</li> <li>• IP address</li> <li>• Information from your social media profile</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Prospective Employers</li> <li>• Interested Employers</li> </ul>
<b>Consumer Demographic Data</b>	<ul style="list-style-type: none"> <li>• Gender</li> <li>• Race</li> <li>• Ethnicity</li> <li>• Disability status</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Prospective Employers</li> <li>• Interested Employers</li> </ul>
<b>Professional or Employment-Related Data</b>	<ul style="list-style-type: none"> <li>• Resume</li> <li>• Job title</li> <li>• Job history</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Prospective Employers</li> <li>• Interested Employers</li> </ul>

	<ul style="list-style-type: none"> <li>• Karat’s performance evaluations</li> </ul>	
<b>Non-Public Education Data</b>	<ul style="list-style-type: none"> <li>• Grades or transcripts</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Prospective Employers</li> <li>• Interested Employers</li> </ul>
<b>Geolocation Data</b>	<ul style="list-style-type: none"> <li>• IP-address-based location information</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> </ul>
<b>Photos, Videos, and Recordings</b>	<ul style="list-style-type: none"> <li>• If you participate in a technical interview, photos, videos and/or audio recordings of you and your technical interview</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Prospective Employers</li> <li>• Interested Employers</li> </ul>
<b>Inferences Drawn From Other Personal Data Collected</b>	<ul style="list-style-type: none"> <li>• Profiles reflecting your performance during Karat interviews and our assessment of your performance.</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Prospective Employers</li> <li>• Interested Employers</li> </ul>
<b>Other Identifying Information that You Voluntarily Choose to Provide</b>	<ul style="list-style-type: none"> <li>• Identifying information in emails or letters you send us</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> </ul>
<b>Special Categories of Data under the GDPR</b>	<ul style="list-style-type: none"> <li>• Race</li> <li>• Ethnicity</li> <li>• Disability status</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Prospective Employers</li> <li>• Interested Employers</li> </ul>

Personal Data of Website Visitors and Prospective Customers

When you visit or interact with our website (www.karat.com), we may collect certain Personal Data about you. For example, we may collect your Personal Data through the website if you express an interest in Karat or if you register for an event on our website. We also collect some data about you automatically when you visit our website including, for example, to understand your interactions with our website in order to improve our Services. For additional information on this automatic collection, please see the “Tracking Tools, Advertising and Opt-Out” section further below. We also collect Personal Data of representatives of prospective customers we think may be interested in our Services.

<b><u>Personal Data of Website Visitors and Prospective Customers</u></b>		
<b><u>Category of Personal Data</u></b>	<b><u>Examples of Personal Data We Collect</u></b>	<b><u>Categories of Third Parties With Whom We Share this Personal Data:</u></b>
<b>Profile or Contact Data</b>	<ul style="list-style-type: none"> <li>• First and last name</li> <li>• Email</li> <li>• Phone number</li> <li>• Mailing address</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> </ul>
<b>Device/IP Data</b>	<ul style="list-style-type: none"> <li>• IP address</li> <li>• Type of device/operating system/browser used to access the Services</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Analytics Partners</li> </ul>
<b>Web Analytics</b>	<ul style="list-style-type: none"> <li>• Web page interactions</li> <li>• Referring webpage/source through which you accessed the Services</li> <li>• Non-identifiable request IDs</li> <li>• Statistics associated with the interaction between device or browser and the Services</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Analytics Partners</li> </ul>

<b>Social Network Data</b>	<ul style="list-style-type: none"> <li>• Email</li> <li>• Phone number</li> <li>• User name</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> </ul>
<b>Geolocation Data</b>	<ul style="list-style-type: none"> <li>• IP-address-based location information</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Analytics Partners</li> </ul>
<b>Other Identifying Information that You Voluntarily Choose to Provide</b>	<ul style="list-style-type: none"> <li>• Identifying information in emails or letters you send us</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> </ul>

Categories of Sources of Personal Data

We collect Personal Data about you from the following categories of sources:

- **You**
  - When you provide such information directly to us.
    - When you create an account or use our interactive tools and Services.
    - When you voluntarily provide information in free-form text boxes through the Services or through responses to surveys or questionnaires.
    - When you send us an email or otherwise contact us.
  - When you use the Services and such information is collected automatically.
    - Through Cookies (defined in the “Tracking Tools, Advertising and Opt-Out” section below).
    - If you use a location-enabled browser, we may receive information about your location.
    - If you download and install certain applications and software we make available, we may receive and collect information transmitted from your computing device for the purpose of providing you the relevant Services, such as information regarding when you are logged on and available to receive updates or alert notices.
- **Third Parties**
  - Vendors
    - We may use analytics providers to analyze how you interact and engage with the Services, or third parties may help us provide you with customer support.
    - We may use vendors to obtain information to generate leads.
  - Advertising Partners
    - We receive information about you from some of our vendors who assist us with marketing or promotional services related to how you interact with our websites, applications, products, Services, advertisements, or communications.
  - Social Networks
    - If you provide your social network account credentials to us or otherwise sign in to the Services through a third-party site or service, some content and/or information in those accounts may be transmitted into your account with us.
  - Prospective Employers
    - If you are a candidate that has been referred to our platform, we receive certain Personal Data about you from the Prospective Employer that referred you.

Our Commercial or Business Purposes for Collecting Personal Data

- **Providing, Customizing and Improving the Services**
  - Creating and managing your account or other user profiles.
  - Providing you with the products, services or information you request.
  - Meeting or fulfilling the reason you provided the information to us.
  - Providing support and assistance for the Services.
  - Improving the Services, including testing, research, internal analytics, comparative assessments and benchmarking, and product development.
  - Personalizing the Services, website content and communications based on your preferences.
  - Processing your information to determine eligibility for certain product features, offerings, and other opportunities provided by Karat or other third parties.
  - Doing fraud protection, security and debugging.
  - Carrying out other business purposes stated when collecting your Personal Data or as otherwise set forth in applicable data privacy laws, such as the California Consumer Privacy Act (the “CCPA”).
- **Marketing the Services**
  - Marketing and selling the Services.
  - Showing you advertisements, including interest-based or online behavioral advertising, if you are a Website Visitor. We may also send you marketing emails if you are a potential customer or a potential interview engineer.
- **Corresponding with You**
  - Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about Karat or the Services.
  - Sending emails and other communications according to your preferences or that display content and certain product features, offerings, and other opportunities that we think will interest you.
  - Providing you with support, feedback, and opportunities for you to provide us with feedback regarding Karat or the Services.
- **Meeting Legal Requirements and Enforcing Legal Terms**
  - Fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.
  - Protecting the rights, property or safety of you, Karat or another party.
  - Enforcing any agreements with you.
  - Responding to claims that any posting or other content violates third-party rights.
  - Resolving disputes.

We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated or incompatible purposes without providing you notice.

### **How We Share Your Personal Data**

We disclose your Personal Data to the categories of service providers and other parties listed in this section. Depending on state laws that may be applicable to you, some of these disclosures may constitute a “sale” of your Personal Data. For more information, please refer to the state-specific sections below.

- **Service Providers.** These parties help us provide the Services or perform business functions on our behalf. They include:
  - Hosting, technology and communication providers.
  - Security and fraud prevention consultants.
  - Support and customer service vendors.
- **Advertising Partners.** These parties help us market our services and provide you with other offers related to Karat, such as our Services and new products and features, that may be of interest to you. We may share the Personal Data of Website Visitors with ad networks for such purposes.
- **Analytics Partners.** These parties provide analytics on web traffic or usage of the Services. They include:
  - Companies that track how users found or were referred to the Services.
  - Companies that track how users interact with the Services.
- **Prospective Employers.** We may share certain of your Personal Data, including our assessment of any technical interviews you complete with Karat and recordings of the interviews, with the Prospective Employer that referred you to Karat.
- **Interested Employers.** When you consent to participate in certain product features, offerings, and other opportunities with Karat and/or certain Interested Employers, we may share certain of your Personal Data, including your contact details, your resume, our assessment of any technical interviews you complete with Karat, recordings of the interviews and any other information with Interested Employers that you approve.

#### Legal Obligations

We may share any Personal Data that we collect with third parties in conjunction with any of the activities set forth under “Meeting Legal Requirements and Enforcing Legal Terms” in the “Our Commercial or Business Purposes for Collecting Personal Data” section above.

#### Business Transfers

All of your Personal Data that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part). Should one of these events occur, we will make reasonable efforts to notify you before your information becomes subject to different privacy and security policies and practices.

#### Data that is Not Personal Data

We may create aggregated, de-identified or anonymized data from the Personal Data we collect, including by removing information that makes the data personally identifiable to a particular user. We may use such aggregated, de-identified or anonymized data and share it with third parties for our lawful business purposes, including to analyze, build and improve the Services and promote our business (including marketing and producing white papers and other publications relating to the Services), provided that we will not share such data in a manner that could identify you.

#### **Tracking Tools, Advertising and Opt-Out**

The Services use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, “Cookies”) to enable our servers to recognize your web browser, tell us how and

when you visit and use our Services, analyze trends, learn about our user base and operate and improve our Services. Cookies are small pieces of data— usually text files – placed on your computer, tablet, phone or similar device when you use that device to access our Services. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s). Please note that because of our use of Cookies, the Services do not support “Do Not Track” requests sent from a browser at this time.

We use the following types of Cookies:

- Essential Cookies. Essential Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Services. Disabling these Cookies may make certain features and services unavailable.
- Functional Cookies. Functional Cookies are used to record your choices and settings regarding our Services, maintain your preferences over time and recognize you when you return to our Services. These Cookies help us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- Performance/Analytical Cookies. Performance/Analytical Cookies allow us to understand how visitors use our Services. They do this by collecting information about the number of visitors to the Services, what pages visitors view on our Services and how long visitors are viewing pages on the Services. Performance/Analytical Cookies also help us measure the performance of our advertising campaigns in order to help us improve our campaigns and the Services’ content for those who engage with our advertising. For example, Google LLC (“Google”) uses cookies in connection with its Google Analytics services. Google’s ability to use and share information collected by Google Analytics about your visits to the Services is subject to the Google Analytics Terms of Use and the Google Privacy Policy. You have the option to opt-out of Google’s use of Cookies by visiting the Google advertising opt-out page at [www.google.com/privacy\\_ads.html](http://www.google.com/privacy_ads.html) or the Google Analytics Opt-out Browser Add-on at <https://tools.google.com/dlpage/gaoptout/>.
- Retargeting/Advertising Cookies. Retargeting/Advertising Cookies collect data about your online activity and identify your interests so that we can provide advertising that we believe is relevant to you. For example, we use Google retargeting/advertising cookies, as well as those provided by other vendors. For more information about this, please see the section below titled “Information about Interest-Based Advertisements.”

You can decide whether or not to accept Cookies through your internet browser’s settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our website and some of the Services and functionalities may not work.

To explore what Cookie settings are available to you, look in the “preferences” or “options” section of your browser’s menu. To find out more information about Cookies, including information about how to manage and delete Cookies, please visit <http://www.allaboutcookies.org/> or <https://ico.org.uk/for-the-public/online/cookies/> if you are located in the European Union.

*Information about Interest-Based Advertisements:*

We may serve advertisements, and also allow third-party ad networks, including third-party ad servers, ad agencies, ad technology vendors and research firms, to serve advertisements through the Services. These advertisements may be targeted to users who fit certain general profile categories or display certain preferences or behaviors (“Interest-Based Ads”). Information for Interest-Based Ads (including Personal Data) may be provided to us by you, or derived from the usage patterns of particular users on the Services and/or services of third parties. Such information may be gathered through tracking users’ activities across time and unaffiliated properties, including when you leave the Services. To accomplish this, we or our service providers may deliver Cookies, including a file (known as a “web beacon”) from an ad network to you through the Services. Web beacons allow ad networks to provide anonymized, aggregated auditing, research and reporting for us and for advertisers. Web beacons also enable ad networks to serve targeted advertisements to you when you visit other websites. Web beacons allow ad networks to view, edit or set their own Cookies on your browser, just as if you had requested a web page from their site.

Users in the European Union should visit the European Interactive Digital Advertising Alliance’s user information website <http://www.youronlinechoices.eu/>.

### **Data Security and Retention**

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, organizational and administrative security measures based on the type of Personal Data and how we are processing that data. You should also help protect your data by appropriately selecting and protecting your password and/or other sign-on mechanism; limiting access to your computer or device and browser; and signing off after you have finished accessing your account. Although we work to protect the security of your account and other data that we hold in our records, please be aware that no method of transmitting data over the internet or storing data is completely secure.

We retain Personal Data about you for as long as you have an open account with us or as otherwise necessary to provide you with our Services. In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. We may further retain information in an anonymous or aggregated form where that information would not identify you personally.

### **Personal Data of Children**

As noted in the Terms of Use, we do not knowingly collect or solicit Personal Data about children under 16 years of age; if you are a child under the age of 16, please do not attempt to register for or otherwise use the Services or send us any Personal Data. If we learn we have collected Personal Data from a child under 16 years of age, we will delete that information as quickly as possible. If you believe that a child under 16 years of age may have provided Personal Data to us, please contact us at [privacy@karat.io](mailto:privacy@karat.io).

### **California Resident Rights**

If you are a California resident, you have the rights set forth in this section. Please see the “Exercising Your Rights” section below for instructions regarding how to exercise these rights. Please note that we may process certain Personal Data of Candidates in our capacity as a service provider to our customers (e.g., Prospective Employers). If we are processing your Personal Data as a service provider, we may suggest

that you also contact the entity that collected your Personal Data to address your rights with respect to such data.

If there are any conflicts between this section and any other provision of this Privacy Policy and you are a California resident, the portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following rights apply to you, please contact us at [privacy@karat.io](mailto:privacy@karat.io).

### Access

You have the right to request certain information about our collection and use of your Personal Data over the past 12 months. In response, we will provide you with the following information:

- The categories of Personal Data that we have collected about you.
- The categories of sources from which that Personal Data was collected.
- The business or commercial purpose for collecting Personal Data.
- The categories of third parties with whom we have shared your Personal Data.
- The specific pieces of Personal Data that we have collected about you.

If we have disclosed your Personal Data to any third parties for a business purpose over the past 12 months, we will identify the categories of Personal Data shared with each category of third party recipient.

### Deletion

You have the right to request that we delete the Personal Data that we have collected about you. Under the CCPA, this right is subject to certain exceptions: for example, we may need to retain your Personal Data to provide you with the Services or complete a transaction or other action you have requested. If your deletion request is subject to one of these exceptions, we may deny your deletion request.

### Exercising Your Rights

To exercise the rights described above, you or your Authorized Agent (defined below) must send us a request that (1) provides sufficient information to allow us to verify that you are the person about whom we have collected Personal Data (e.g., your email address, name (if applicable), and date of interview (if applicable)), and (2) describes your request in sufficient detail to allow us to understand, evaluate and respond to it. Each request that meets both of these criteria will be considered a "Valid Request." We may not respond to requests that do not meet these criteria. We will only use Personal Data provided in a Valid Request to verify your identity and complete your request. You do not need an account to submit a Valid Request.

We will work to respond to your Valid Request within 45 days of receipt. We will not charge you a fee for making a Valid Request unless your Valid Request(s) is excessive, repetitive or manifestly unfounded. If we determine that your Valid Request warrants a fee, we will notify you of the fee and explain that decision before completing your request.

You may submit a Valid Request using the following methods:

- Call us at: (509) 761-9141
- Email us at: [privacy@karat.io](mailto:privacy@karat.io)

You may also authorize an agent (an “Authorized Agent”) to exercise your rights on your behalf. To do this, you must provide your Authorized Agent with written permission to exercise your rights on your behalf, and we may request a copy of this written permission from your Authorized Agent when they make a request on your behalf.

#### Personal Data Sales Opt-Out and Opt-In

We will not sell your Personal Data, and have not done so over the last 12 months. To our knowledge, we do not sell the Personal Data of minors under 16 years of age.

#### We Will Not Discriminate Against You for Exercising Your Rights Under the CCPA

We will not discriminate against you for exercising your rights under the CCPA. We will not deny you our goods or services, charge you different prices or rates, or provide you a lower quality of goods and services if you exercise your rights under the CCPA. However, we may offer different tiers of our Services as allowed by applicable data privacy laws (including the CCPA) with varying prices, rates or levels of quality of the goods or services you receive related to the value of Personal Data that we receive from you.

#### **Other State Law Privacy Rights**

##### California Resident Rights

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of Personal Data to third parties for such third parties’ direct marketing purposes; in order to submit such a request, please contact us at [privacy@karat.io](mailto:privacy@karat.io). However, Karat does not disclose Personal Data to third parties for such third parties’ direct marketing purposes.

##### Nevada Resident Rights

If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Data to third parties who intend to license or sell that Personal Data. You can exercise this right by contacting us at [privacy@karat.io](mailto:privacy@karat.io) with the subject line “Nevada Do Not Sell Request” and providing us with your name and the email address associated with your account. However, Karat does not sell Personal Data.

#### **European Union Data Subject Rights**

##### EU Residents

If you are a resident of the European Union (“EU”), United Kingdom, Lichtenstein, Norway or Iceland, you may have additional rights under the EU General Data Protection Regulation (the “GDPR”) with respect to your Personal Data, as outlined below.

For this section, we use the terms “Personal Data” and “processing” as they are defined in the GDPR, but “Personal Data” generally means information that can be used to individually identify a person, and “processing” generally covers actions that can be performed in connection with data such as collection, use, storage and disclosure. Karat will be the controller of your Personal Data processed in connection with the Services.

If there are any conflicts between this section and any other provision of this Privacy Policy, the policy or portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following applies to you, please contact us at [privacy@karat.io](mailto:privacy@karat.io). Please note that we may act as a processor when we collect certain Personal Data about Candidates from the Prospective Employers. In these cases, we may suggest that you also contact the controller party (typically, the Prospective Employer that referred you to Karat) to address your rights with respect to such data.

### Personal Data We Collect

The “Categories of Personal Data We Collect” section above details the Personal Data that we collect from you.

### Personal Data Use and Processing Grounds

The “Our Commercial or Business Purposes for Collecting Personal Data” section above explains how we use your Personal Data.

We will only process your Personal Data if we have a lawful basis for doing so. Lawful bases for processing include consent, contractual necessity and our “legitimate interests” or the legitimate interest of others, as further described below.

### With respect to Candidate Personal Data:

- Contractual Necessity: We process the following categories of Personal Data as a matter of “contractual necessity,” meaning that we need to process the data to perform under our Job Candidate Interview Agreement with you, which enables us to provide you with the Services. When we process data due to contractual necessity, failure to provide such Personal Data will result in your inability to use some or all portions of the Services that require such data.
  - Profile or Contact Data
  - Professional or Employment-Related Data
  - Non-Public Education Data
  - Photos, Videos, and Recordings
  - Inferences Drawn from other Personal Data Collected
- Legitimate Interest: We process the following categories of Personal Data when we believe it furthers the legitimate interest of us or third parties:
  - Consumer Demographic Data
  - Device/IP Data
  - Web Analytics
  - Social Network Data
  - Geolocation Data
  - Consumer Demographic Data
  - Other Identifying Information You Voluntarily Choose to Provide
  - We may also de-identify or anonymize Personal Data to further our legitimate interests.

Examples of these legitimate interests include (as described in more detail above):

- Providing, customizing and improving the Services.
- Marketing the Services.

- Quality control.
- Corresponding with you.
- Meeting legal requirements and enforcing legal terms.
- Completing corporate transactions.
- **Consent:** In some cases, we process Personal Data based on the consent you expressly grant to us at the time we collect such data. When we process Personal Data based on your consent, it will be expressly indicated to you at the point and time of collection.
- **Other Processing Grounds:** From time to time we may also need to process Personal Data to comply with a legal obligation, if it is necessary to protect the vital interests of you or other data subjects, or if it is necessary for a task carried out in the public interest.

With respect to Personal Data of Website Visitors and Prospective Customers:

- We process the following categories of Personal Data when we believe it furthers the legitimate interest of us or third parties:
  - Profile or Contact Data
  - Device/IP Data
  - Web Analytics
  - Social Network Data
  - Geolocation Data
  - Other Identifying Information that You Voluntarily Choose to Provide
- Examples of these legitimate interests include (as described in more detail above):
  - Providing, customizing and improving the Services.
  - Marketing the Services.
  - Quality control.
  - Corresponding with you.
  - Meeting legal requirements and enforcing legal terms.
  - Completing corporate transactions.
- **Consent:** In some cases, we process Personal Data based on the consent you expressly grant to us at the time we collect such data. When we process Personal Data based on your consent, it will be expressly indicated to you at the point and time of collection.
- **Other Processing Grounds:** From time to time we may also need to process Personal Data to comply with a legal obligation, if it is necessary to protect the vital interests of you or other data subjects, or if it is necessary for a task carried out in the public interest.

Sharing Personal Data

The “How We Share Your Personal Data” section above details how we share your Personal Data with third parties.

EU Data Subject Rights

You have certain rights with respect to your Personal Data, including those set forth below. For more information about these rights, or to submit a request, please email us at [privacy@karat.io](mailto:privacy@karat.io). Please note that in some circumstances, we may not be able to fully comply with your request, such as if it is frivolous or extremely impractical, if it jeopardizes the rights of others, or if it is not required by law, but in those circumstances, we will still respond to notify you of such a decision. In some cases, we may also need you

to provide us with additional information, which may include Personal Data, if necessary to verify your identity and the nature of your request.

- **Access:** You can request more information about the Personal Data we hold about you and request a copy of such Personal Data.
- **Rectification:** If you believe that any Personal Data we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data.
- **Erasure:** You can request that we erase some or all of your Personal Data from our systems.
- **Withdrawal of Consent:** If we are processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have to then provide express consent on a case-by-case basis for the use or disclosure of certain of your Personal Data, if such use or disclosure is necessary to enable you to utilize some or all of our Services.
- **Portability:** You can ask for a copy of your Personal Data in a machine-readable format. You can also request that we transmit the data to another controller where technically feasible.
- **Objection:** You can contact us to let us know that you object to the further use or disclosure of your Personal Data for certain purposes, such as for direct marketing purposes.
- **Restriction of Processing:** You can ask us to restrict further processing of your Personal Data.
- **Right to File Complaint:** You have the right to lodge a complaint about Karat's practices with respect to your Personal Data with the supervisory authority of your country or EU Member State. A list of Supervisory Authorities is available here: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en).

### Transfers of Personal Data

The Services are hosted and operated in the United States (“U.S.”) through Karat and its service providers, and if you do not reside in the U.S., laws in the U.S. may differ from the laws where you reside. By using the Services, you acknowledge that any Personal Data about you, regardless of whether provided by you or obtained from a third party, is being provided to Karat in the U.S. and will be hosted on U.S. servers, and you authorize Karat to transfer, store and process your information to and in the U.S., and possibly other countries.

Karat has certified to the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks set forth by the U.S. Department of Commerce regarding the collection and use of Personal Data transferred from the EU and Switzerland to the U.S., respectively. Although the Privacy Shield is no longer a valid lawful basis on which Karat may rely to transfer personal data from the EU to the U.S. pursuant to the GDPR, Karat continues to comply with both the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks. For more information about the Privacy Shield Program, and to view Karat's certification, please visit [www.privacyshield.gov](http://www.privacyshield.gov). Karat is committed to the Privacy Shield Principles of (1) notice, (2) consent, (3) accountability for onward transfer, (4) security, (5) data integrity and purpose limitation, (6) access and (7) recourse, enforcement and liability with respect to all Personal Data received from within the EU and Switzerland in reliance on the Privacy

Shield. The Privacy Shield Principles require that we remain potentially liable if any third party processing Personal Data on our behalf fails to comply with these Privacy Shield Principles (except to the extent we are not responsible for the event giving rise to any alleged damage). Karat's compliance with the Privacy Shield is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission.

Please contact us at [privacy@karat.io](mailto:privacy@karat.io) with any questions or concerns relating to our Privacy Shield Certification. If you do not receive timely acknowledgment of your Privacy Shield-related complaint from us, or if we have not resolved your complaint, you may also resolve a Privacy Shield-related complaint through JAMS, an alternative dispute resolution provider located in the U.S. You can visit <https://www.jamsadr.com/file-an-eu-us-privacy-shield-or-safe-harbor-claim> for more information or to file a complaint, at no cost to you. Under certain conditions, you may also be entitled to invoke binding arbitration for complaints not resolved by other means.

### **Changes to this Privacy Policy**

We're constantly trying to improve our Services, so we may need to change this Privacy Policy from time to time, but we will alert you to any such changes by placing a notice on the Karat website, by sending you an email and/or by some other means. Please note that if you've opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes. Use of information we collect is subject to the Privacy Policy in effect at the time such information is collected.

### **Contact Information:**

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Data or your choices and rights regarding such collection and use, please do not hesitate to contact us at:

- (509) 761-9141
- [www.karat.com](http://www.karat.com)
- [privacy@karat.io](mailto:privacy@karat.io)
- 1414 NE 42nd St, Ste 204  
Seattle, WA 98105-6271 USA

If you are located in the European Union or the United Kingdom (UK), you may use the following information to contact our Data Protection Officer and our European Union- and UK-Based Member Representatives:

- **Dr. Felix Wittern (DPO):**  
[privacy@karat.io](mailto:privacy@karat.io)  
Fieldfisher Tech Rechtsanwaltsgesellschaft mbH, Am Sandtorkai 68, 20457 Hamburg, Germany
- **EU Member Representative:**  
[Karat@LionheartSquared.eu](mailto:Karat@LionheartSquared.eu)  
Lionheart Squared (Europe) Ltd, 2 Pembroke House, Upper Pembroke Street 28-32, Dublin  
D02 EK84, Republic of Ireland

- **UK Member Representative:**  
Karat@LionheartSquared.co.uk  
Lionheart Squared Limited, Attn: Data Privacy, 17 Glasshouse Studios, Fryern Court Road,  
Fordingbridge, Hampshire, SP6 1QX, United Kingdom

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