

# Harmony Agent Privacy Policy

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## **Introduction**

We at Harmony Agent, Inc. as well as our affiliates (collectively, “we”, “us” or “our”) respect your privacy and are committed to protecting it through our compliance with this Harmony Agent Privacy Policy (this “Policy”). This Policy describes the types of information we may collect from you or that you may provide to us when you visit our website at <https://harmonyforstaffing.com> or <https://harmonyverify.com>, as well as any successor or subdomains thereof and any other websites where we post this Policy (collectively, our “Website”), and our practices for collecting, using, maintaining, protecting and disclosing that information.

This Policy applies to any information that we collect on the Website, as well as any information collected through our AI and human-assisted communication services, including SMS messages, phone calls, and other interactions related to candidate pre-screening, job matching, and interview scheduling (collectively, the “Harmony Agent Services”). This Policy does not apply to any other information that we may collect by any other means, including any information you may provide in connection with your or your organization’s use of any of our applications, software platforms or related services (the “Harmony Agent Services”). If you or your organization are a customer of the Harmony Agent Services, you will need to refer to our agreement with you or your organization for information about our policies and practices for collecting and processing information in connection with your use of the Harmony Agent Services.

**Please read this Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, you can choose not to use our Website or provide us with your information. By accessing or using our Website, you agree to this Policy. This Policy may change from time to time. When we make changes to this Policy, we will post the updated Policy on our Website and update the Policy’s “Last Modified” date. We will also provide notice of any material changes as explained in the section below titled “Changes to Our Privacy Policy.” Your continued use of the Website after we make changes is deemed to be acceptance of those changes.**

## **Information We Collect About You and How We Collect It**

### *Personal Information We Collect*

We may collect several types of information from and about users of our Website. This may include information by which users may be personally identified or information about a user that is maintained in personally-identifiable form (collectively, “Personal Information”). Specifically, we (or our third-party service providers acting on our behalf) may collect the following:

- Personal identifiers and contact information, such as your name, e-mail address, telephone number (including mobile telephone number) and the IP address or mobile device ID of the computer or device used to access and use our Website.

- Your company or organization’s name and/or location.
- Your job title.
- Information regarding how you learned about us, our Website or our products or services.
- Any other information you choose to provide in any forms or messages submitted by you to us through our Website or using the contact information provided on our Website.
- The Technical Information described in the section below titled “*Traffic, Usage and Computer/Device Information.*”

### *How We Collect Information*

We primarily collect Personal Information directly from you as you provide it or submit it to us (or our third-party service providers acting on our behalf), including in connection with:

- Signing up to obtain additional information from us (such as through our periodic e-mails, newsletters or other marketing and promotional information about us or our products or services);
- Contacting us for service requests or to report a problem with the Website; or
- Otherwise submitting an inquiry to us using the contact methods provided on our Website.

We (or our third-party service providers acting on our behalf) may also collect your Technical Information automatically as you navigate through or interact with our Website (see section below titled “*Traffic, Usage and Computer/Device Information*”). Additionally, we may receive your Personal Information from third-party data brokers, resellers, data analytics providers or other similar service providers, such as Apollo.io, from whom we license certain data used to assist us in our business operations, including business-to-business sales prospecting and outreach or other customer relationship management efforts.

In addition to the information collected via our Website, Harmony Agent may collect and process Personal Information through AI-assisted and human-facilitated SMS and phone calls for the purpose of candidate pre-screening, job matching, credentialing, scheduling, and recruitment-related updates. When you engage with Harmony’s SMS or telephonic services, we may collect:

- Call logs, timestamps, and message metadata (e.g., duration, phone number, carrier information).
- Transcripts and recordings of calls, including automated or AI-generated interactions.
- Content of text messages and responses provided by candidates during pre-screening or scheduling.
- Opt-in and opt-out preferences regarding SMS and phone communications.

Harmony Agent uses this information to facilitate recruitment processes, enhance AI model accuracy, ensure compliance with relevant laws, and improve customer service. We do not use call or message content for marketing purposes without explicit consent.

### *Traffic, Usage and Computer/Device Information*

Additionally, as you navigate through and interact with our Website or interact with e-mail messages you receive from us, we may automatically collect certain traffic data, usage information and information about your computer equipment or mobile device, such as your IP address or mobile device ID, your browser and operating system, your wireless carrier, the geographic region from which you are accessing the Website, time stamped logs regarding access times and duration of visits, the pages of our Website that you visit, whether you opened the e-mail message we sent to you and whether you clicked on any links in the message, configuration data, clickstream analytics and your actions and patterns when you use our Website or interact with our e-mail messages (collectively, “Technical Information”). The technologies we use for this automatic data collection may include cookies that are stored on the browser of your computer or mobile device, small embedded electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) and other types of embedded code. We collect this information to manage our content and improve users’ use of our Website; to count and review the number of users of our Website and their usage patterns; to track key performance indicators such as pages accessed, frequency of access and other statistical information related to our Website and the performance of our e-mail messages (for example, recording the popularity of certain content and verifying system and server integrity); to identify the portion of users who access our Website via different web browsers or mobile operating systems; to recognize if a user is a return user of our Website; to store information about a user’s visits; to remember a user’s preferences; and for similar purposes in connection with monitoring, maintaining and improving our Website and our e-mail messaging. Third parties may also collect Technical Information and other information on our behalf as further described in the sections below titled “*Use of Personal Information for Marketing Purposes*,” “*Tracking and ‘DO NOT TRACK’*,” “*Use of Google Analytics*” and “*Use of Meta Business Tools*.”

You can set your browser to refuse all or some browser cookies. If you choose not to accept cookies, you may be unable to access certain parts or pages of our Website, or certain parts, pages or features of our Website may not function properly.

### **How We Use Your Information**

#### *Generally*

We may use the information we collect about you or that you provide to us, including Personal Information, to:

- Provide our Website and its contents to you.
- Provide you with information, products or services you request from us.
- Authenticate or otherwise verify your identity in connection with your access to the Website, requests via the Website or otherwise.
- Provide you with support and respond to your inquiries and customer service and support requests, including to investigate and address your concerns and to monitor and improve our responses.

- Update and maintain subscription, e-mail or mailing lists (such as our e-mail lists to receive newsletters or alerts by e-mail).
- Carry out the advertising, promotional and marketing purposes as described in the section below titled “*Use of Personal Information for Marketing Purposes.*”
- Help maintain the safety, security and integrity of our Website, databases and other technology assets and our business.
- Perform research and development activities, which may include, for example, conducting data analyses in order to develop new products and services or to improve existing products and services, and performing quality control activities.
- With respect to Technical Information, fulfill the purposes described in the section above titled “*Traffic, Usage and Computer/Device Information.*”
- With respect to aggregated and de-identified information, fulfill the purposes described in the section below titled “*Use and Disclosure of Aggregated or De-Identified Data.*”
- Notify you about changes to our Website, our products or services or this Policy.
- Respond to lawful requests for information through court orders, subpoenas, warrants and other legal processes or obligations.
- Enforce any contracts between you and us, including for billing and collection, or for the establishment, exercise or defense of legal claims.
- Evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which information (including Personal Information) held by us is among the assets transferred.
- Fulfill any other purpose for which you provide the information.
- Serve any other purpose that we describe when you provide the information and for any other purpose with your consent.
- Facilitate AI and human-assisted SMS and phone communications, including candidate pre-screening, interview scheduling, and recruitment-related updates.
- Improve AI-based screening and matching capabilities through call and SMS data analysis.
- Maintain compliance with relevant legal obligations, including record-keeping and honoring opt-out requests for SMS and phone communications.
- Investigate and resolve disputes or issues related to recruitment communications.

#### *Use of Personal Information for Marketing Purposes*

We (and certain third-party service providers acting on our behalf) may use your information (including Personal Information) for advertising, promotional and other marketing purposes in various ways. This includes:

- Providing you with informational and promotional content and materials regarding the Website and our products and services, such as advertising and promotional information about our products and services or information about special offers or promotions related to our products and services.
- Using third-party tools (such as Google Analytics, Meta Business Tools and LinkedIn Ads – see sections below titled “*Use of Google Analytics*” and “*Use of Meta Business Tools*”) to advertise our products or services to you or other individuals across third-party websites.

Please note that we will not share your mobile information with third parties or affiliates for marketing or promotional purposes.

If you do not want us to use your information in this manner, see the section below titled “*Your Rights and Choices*” for more information about how to opt out of such uses.

#### *Use and Disclosure of Aggregated or De-Identified Data*

We may convert or combine some Personal Information of users into de-identified or aggregated data that does not disclose any of the Personal Information of any individual user. We may use and disclose to third parties any such de-identified or aggregated data (including but not limited to traffic and usage data that does not identify you personally) for any lawful purpose.

#### *Tracking and “DO NOT TRACK”*

Tracking involves the use of cookies, web beacons or other embedded code or tracking technologies to collect, analyze and store information on a user’s behavior over time on multiple sites, including information on the sites visited, products viewed, products purchased and other online interactions. Tracking information can be used to enable companies to make interest-based (behavioral) advertising available to users on multiple sites that they visit.

We may (or our third-party service providers may on our behalf) collect Personal Information about your online activities over time and across third-party sites for tracking purposes when you use our Website. However, we do not currently allow third parties to collect Personal Information through or using our Website that could be used by them to analyze and store information about your online activities over time and across third-party sites for their own tracking purposes (separate and apart from any services they provide to us in support of our permitted uses of your Personal Information as described in this Policy).

Our Website does not respond to any “do not track” signals sent by your computer, browser or mobile device, and if your computer, browser or mobile device sends a “do not track” signal to our Website, our Website will not treat you differently from users who do not send such signals. For more information on how to disable certain tracking technologies, please visit the Network Advertising Initiative’s Consumer Opt-Out page at <https://thenai.org/opt-out/> and the Digital Advertising Alliance’s Consumer Assistance page at <https://youradchoices.com/>.

#### *Use of Google Analytics*

We use Google Analytics to track and analyze certain traffic and usage statistics regarding the use of our Website, such as the number of visitors to our Website, how visitors are navigating to our Website, visitors’ general geographic region information, how long individuals are visiting our Website, and information about the equipment individuals are using to access our Website (e.g., browser version and operating system). Google Analytics may use a Google Analytics cookie as part of this service, and we may share certain Personal Information with Google Analytics as part of this service. We use this traffic and usage information to gauge, internally, the effectiveness of

our advertising efforts and to make improvements to our Website and our marketing and promotional efforts.

In addition, we may use the following Google Analytics Advertising Features:

- Remarketing
- Google Display Network Impression Reporting
- Google Analytics Demographics and Interest Reporting
- Google Ads (as an integrated service with Google Analytics)

By enabling these features, we and certain third-party vendors use first-party cookies (such as the Google Analytics cookie) or other first-party identifiers, and third-party cookies (such as Google advertising cookies) or other third-party identifiers together for various purposes. The information collected includes demographic information about our Website visitors and general information about our visitors' interests. We use the information collected through our use of the Google Analytics Advertising Features to track our Website visitors' patterns and behaviors, segment our audience, and to better target our advertising and marketing efforts (for our own and others' products and services) and allow third-party vendors to do the same, for example to (1) display targeted advertisements to individuals who viewed a product or service but did not purchase the product or service, (2) target visitors from a certain geographic region with certain ads in Google search results that have previously shown a high degree of success for consumers in that region, (3) advertise our products and services across other websites that you may visit, or (4) allow Google or other third-party vendors to show you ads on websites that you visit after using our Website or clicking on an offer or ad in one of our e-mails or in our Website.

For more information, please review the following:

- Information about Google's use of cookies: <https://policies.google.com/technologies/cookies#types-of-cookies>
- Information about Google's use of information from sites or apps that use Google's services: <https://policies.google.com/technologies/partner-sites>

You can opt out of our use of certain Google Analytics features by updating the "Ads Settings" in your browser (<https://myadcenter.google.com/home>) or mobile device ([www.support.google.com/ads/answer/1660762#mob](http://www.support.google.com/ads/answer/1660762#mob)), by enabling the Google Analytics Opt-out Browser Add-on in your browser (<https://tools.google.com/dlpage/gaoptout>) or by visiting the Network Advertising Initiative's Consumer Opt-Out page ([www.optout.networkadvertising.org/](http://www.optout.networkadvertising.org/)). Because those opt-out and preference control pages are specific to the individual browser used to visit it, and because those pages are not operated by us, we are unable to perform the opt-outs on your behalf.

#### *Use of Meta Business Tools*

We may use various advertising services and business tools provided by Meta (operator of the Facebook website) in connection with our Website. The services and tools we may use are

summarized here: <https://www.facebook.com/legal/terms/business tools>. In connection with our use of these services and tools, Meta may use cookies, web beacons, and other storage technologies to collect or receive information from the Website and elsewhere on the Internet and use that information to provide measurement services and target ads to you and others. These technologies may include, but are not limited to, Meta Pixel, Conversions API, App Events via Facebook SDK, Offline Conversions, and App Events API. In connection with this service we may provide your e-mail address to Meta along with the e-mail addresses of our other users, and Meta may use this information to find other users of its Facebook platform with similar demographics and interests as indicated in the profiles and activities on Facebook of our users generally, to help us better target our advertising efforts on Facebook to those other Facebook users. You can opt out of certain Meta advertising features by visiting the Network Advertising Initiative's Consumer Opt-Out page at <https://thenai.org/opt-out/> and the Digital Advertising Alliance's Consumer Assistance page at <https://youradchoices.com/control> or by adjusting the privacy settings in your Facebook profile. Because those opt-outs, preference control pages, and privacy settings are specific to the individual browser used to visit them or the individual Facebook profile, and because those opt-outs, preference control pages, and privacy settings are not operated or controlled by us, we are unable to perform the opt-outs, set your preferences, or adjust the privacy settings on your behalf.

### **Disclosure of Your Information**

We may share your Personal Information with third parties in the following circumstances:

- We may disclose Personal Information to any contractors, service providers and other third parties who need to know such information (or such contractors, service providers or other third parties may collect Personal Information directly from you on our behalf while you use our Website) in order to provide services to us that support our hosting, maintenance, operation and promotion of our Website and our business and our permitted uses of Personal Information under this Policy. For example, we may disclose information to certain third parties (such as, for example, the third parties listed below) who perform the following services on our behalf:
  - Website analytics and digital advertising (for example, Google Analytics, Meta Business Tools and LinkedIn Ads)
  - Website and database hosting (for example, Amazon Web Services)
  - Customer relationship management and e-mail marketing (for example, HubSpot and Apollo.io)
- We may disclose Personal Information to (or permit Personal Information to be collected on our Website by) certain third parties as described in the Section above titled "*Tracking and 'DO NOT TRACK.'*"
- We may disclose Personal Information to our affiliates or to a buyer or other successor to our business in the event of a sale of equity or assets, reorganization, merger, divestiture or a similar corporate transaction, whether as a going concern or as part of a bankruptcy, liquidation or similar proceeding, and any due diligence review with respect to any such proposed transaction.

- We may disclose Personal Information to comply with any court order, law or legal process, including to meet national security and law enforcement requirements or to respond to any government or regulatory request or audit.
- We may disclose Personal Information to enforce or apply any legal agreements between us and you, or if we believe disclosure is necessary or appropriate to protect the rights, property or safety of our users or others.
- We may share call and SMS data with third-party service providers who facilitate communication technologies, transcription services, call analytics, and customer relationship management tools. These service providers are contractually required to use the data solely for providing these services and must adhere to applicable data privacy and security laws.

We may also disclose your Personal Information for any purpose disclosed when the information is provided, and for any other purpose with your consent. We may disclose all forms of Personal Information for each of the purposes described above.

### **Third-Party Sites and Services**

Our Website and e-mail messages to you may include links to blogs, social media and third-party websites. These third-party sites have their own privacy policies and terms of use and are not controlled by this Policy. You should carefully review any terms, conditions and policies of such third-party sites before visiting them or supplying them with any Personal Information. If you follow a link on our Website or e-mail messages to any third-party site, any information you provide to that site will be governed by its own terms of use and privacy policy and not this Policy.

We are not responsible for the privacy or security of any information you provide to a third-party website or the information practices used by any third-party site, including links to any third-party site from our Website or e-mail messages. We make no representations, express or implied, concerning the accuracy, privacy, safety, security or the information practices of any third-party site. The inclusion of a link to a third-party site on our Website or in our e-mail messages does not constitute any type of endorsement of the linked site by us. We are not responsible for any loss or damage you may sustain resulting from your use of any third-party website or any information you share with a third-party website.

### **Your Rights and Choices**

You have certain choices regarding the Personal Information you provide to us. You can set your browser to refuse all or some browser cookies. If you choose not to accept cookies, you may be unable to access certain parts or pages of our Website, or certain parts or features of our Website may not function properly.

If you do not wish to have your Personal Information used by us to contact you with promotional or informational content or messages, you may send us an e-mail stating your request to



[hello@harmonyverify.com](mailto:hello@harmonyverify.com) or you can opt out by simply clicking on the “Unsubscribe” or similar link in the most recent e-mail you received from us and by following the prompts that appear. This opt-out does not apply to information provided as a result of a product or service purchase, customer service or support service inquiry, or other informational or transactional communications, nor does it apply to your disclosure to a third party that is acting on our behalf and under our instruction in support of our permitted uses of your Personal Information.

You may send us an e-mail at [hello@harmonyverify.com](mailto:hello@harmonyverify.com) to request access to any Personal Information you have provided to us, or to correct or delete that Personal Information. The following will apply with respect to each such request:

- For security reasons, we may need to request specific information from you to help us confirm your identity before we correct or delete any of your Personal Information.
- We will evaluate such requests on a case-by-case basis. In certain cases we cannot delete your Personal Information. For example, if we have provided you with an account to access certain parts of our Website, we cannot continue to maintain your account in connection with our Website without retaining certain portions of your Personal Information, so a request to delete certain forms of Personal Information may require the deletion of your account and cessation of services to you.
- We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you do not wish to receive AI-assisted or human-facilitated SMS or phone calls from us, you may opt out by:

- Replying **STOP** to any SMS message you receive from us.
- Requesting to be removed from call lists by emailing **hello@harmonyverify.com**.
- Adjusting your communication preferences in your account settings (if applicable).

Opting out of these communications will not affect your ability to use other Harmony Agent Services, and no candidate is required to consent to AI-assisted communications as a condition of job placement.

### **Users Outside of the United States**

Our Website is hosted in the United States and provided from the United States. It is possible that certain information will be stored on servers in multiple other countries on the “cloud” or other similar distributed hosting platforms. If you are accessing our Website from Canada, the European Union, Asia or any other jurisdiction with laws governing personal data collection, use and disclosure that differ from United States laws, please note that by using the Website and providing your Personal Information to us and others through the Website you are expressly and knowingly consenting to the transfer of your Personal Information from your home country to the United

States and other jurisdictions as indicated above (where laws may differ from the laws of your jurisdiction) and you are expressly and knowingly consenting to our use and disclosure of such Personal Information in accordance with this Policy.

### **California “Shine The Light” Disclosure**

The California Civil Code permits California residents with whom we have an established business relationship to request that we provide a list of certain categories of Personal Information that we have disclosed to third parties for their direct marketing purposes during the preceding calendar year. To make such a request, please send an e-mail to [hello@harmonyverify.com](mailto:hello@harmonyverify.com). Please mention that you are making a “California Shine the Light” inquiry. However, please know that we do not currently disclose Personal Information to third parties for their direct marketing purposes.

### **Nevada Residents: Sale Opt-Out Rights**

Nevada residents who wish to exercise their sale opt-out rights under Nevada Revised Statutes Chapter 603A may submit a request to this designated address: [hello@harmonyverify.com](mailto:hello@harmonyverify.com). Please mention that you are making a “Nevada Sale Opt-Out Right” request. However, please know we do not currently sell data triggering that statute’s opt-out requirements.

### **Children Under the Age of 16**

Our Website and our products and services are not intended to be used by children under 16 years of age, and no one under age 16 may provide any information to us or others on or using the Website or otherwise. We do not knowingly collect Personal Information from children under age 16. If you are under 16 years of age, do not use or provide any information on the Website or otherwise use our services, or provide any information about yourself to us, including your name, address, telephone number, e-mail address, IP address or mobile device ID or any screen name or username you may use. If we learn we have collected or received Personal Information from a child under 16 years of age without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under age 16, please contact us at [hello@harmonyverify.com](mailto:hello@harmonyverify.com).

### **Data Security**

We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration and disclosure. The safety and security of your information also depends on you. If we have given you (or if you have chosen) a password for access to certain parts of our Website, you are responsible for keeping that password confidential. We ask you not to share your password with anyone. Unfortunately, the transmission of information over the Internet is not completely secure. Although we have implemented security measures that we think are adequate, we cannot guarantee the security of your Personal Information transmitted to or using our Website. Any transmission of Personal Information is at your own risk. We are not responsible for the circumvention of any privacy settings or security measures contained on our Website.

### **Changes to Our Privacy Policy**

We post any changes we make to our Policy on this page. If we make material changes to how we treat our users' Personal Information, we will notify you by e-mail to the primary e-mail address we have on file for you or through a notice on our Website home page. The date the Policy was last revised is identified at the top of the page. You are responsible for periodically visiting our Website and this Policy to check for any changes.

### **Contact Information**

We are Harmony Agent, Inc., a Delaware corporation. To ask questions or to submit comments about this Policy or our privacy practices, you may contact us via e-mail at [hello@harmonyverify.com](mailto:hello@harmonyverify.com).