



Signal Labs Talent/BrassRing Privacy Notice

The information contained in this document is the property of Signal Labs Talent. Except as specifically authorized in writing by Signal Labs Talent, the holder of this document shall: (1) keep all information contained herein confidential and shall protect same in whole or in part from disclosure and dissemination to all third parties and, (2) use same for operating and maintenance purposes only.

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This privacy policy will explain how Signal Labs Talent ("Signal Labs Talent" or "we") uses the personal data we collect from you when you use our Talent Acquisition Suite of Products and related professional services, including Signal Labs Talent Platform, BrassRing ATS, BrassRing Onboarding, BrassRing Lead Manager, and related services (the "Services").

Topics Covered:

- Signal Labs Talent as a Service Provider
- What personal data do we collect?
- What is Signal Labs Talent's legal basis for process personal data?
- How do we collect personal data?
- How will we use personal data?
- Does Signal Labs Talent sell personal data collected by our customers?
- How do we store personal data?
- How do we secure the data?
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Signal Labs Talent as a Service Provider

Signal Labs Talent customers are organizations such as businesses, non-profit organizations, government agencies, and educational institutions, who use our Services to help them manage their personnel and job applicants. Signal Labs Talent processes personal data through these Services only according to our customers' instructions pursuant to a contract. In this way, Signal Labs Talent is a "processor" or a "service provider," while our customers are the "controller" or the "business." If you have questions about personal data you have entered into a Signal Labs Talent Service or want to exercise any of your rights regarding your personal data, the privacy laws and our customer contract requires that we redirect your inquiry back to that Signal Labs Talent customer.

To begin this request please [click here](#).

What data do we collect?

For Customer users of the Services the data collected may include, but is not limited to:

- first name, last name, address, email address, phone number(s)

Signal Labs Talent's Services are customizable by its customers, who can configure the Services to collect a variety of personal data from applicants, which may typically include, but is not limited to:

- first name, last name, address, email address, phone number(s), education history, work experience, CV/resume, information about primary country of residence and citizenship, additional countries of interest, country you are applying to and the eligibility to work there, areas and communities of interest;
- depending on the country, disability, ethnicity, gender, race, religion, or other characteristics of protected classifications under California or federal law;
- For transfers or rehires: employee id, job title, department
- Other data, as configured by customer to complete a job applications

Additionally, we collect business contact information for account management purposes related to the use of Services. This includes account registration information (e.g., name and email), profile information (e.g., company name and title).

What is Signal Labs Talent's legal basis for process personal data?

For individuals that are from the European Economic Area (EEA) or other regions that stipulate a lawful basis for processing personal information (such as under GDPR Article 6), our legal basis for collecting and using their personal information will depend on the nature and circumstances of the processing activity. Where we are the processor for our customers, our legal basis may be fulfilment of a contract, consent, or legitimate interests. Where we are the controller, our legal basis will be consent or legitimate interest where the processing is in our legitimate interests and not overridden by the individual's data protection interests, or fundamental rights and freedoms. These interests are to provide individuals with access to the Services and features of the Services; to send them information they have requested; to ensure the security of our Services by trying to prevent unauthorized or malicious activities; or to enforce compliance with our terms of use, contracts, and other policies.

How do we collect personal data?

Signal Labs Talent customers provide Signal Labs Talent with most of the personal data we collect. We collect data and process data when:

- Customers purchase our Services through a contract and create user accounts to access Services.
- Customers or their personnel or job candidates voluntarily submit information through our Services to complete a job applications, survey, or provide feedback on any of our message boards or via email.
- Use or view our website via browser's cookies.
- Integrations with Customer systems

Signal Labs Talent may also receive personal data indirectly from our customers who upload and share personal data through the Services.

How will we use personal data?

Signal Labs Talent collects personal data on behalf of our Customers at their direction so that we can deliver the Services to its customers. Customers utilize the Services to manage their personnel and their job applicants. We encourage individuals to review the privacy policy of any Signal Labs Talent customer who utilizes the Services for more information. Signal Labs Talent discloses personal data to our subsidiaries and affiliates for the purpose of providing Services to our customers.

Signal Labs Talent uses the data we collect to understand how our websites and Services are being used and to make improvements. For example, we may solicit feedback about experience using our Services, and ways that we can improve them. Additionally, we use questions posted or comments on online community to enrich the content or help guide future enhancements to our products and services.

Signal Labs Talent may use personal information to diagnose technical problems, as well as to prevent, detect, mitigate, and investigate potential security issues, as well as fraudulent or illegal activity.

Does Signal Labs Talent sell personal data collected by our customers?

Signal Labs Talent does not use personal data of our customers for any purposes other than to provide services that our customers have contracted us to provide through our Services, to improve our Services, or as required or permitted by law. Signal Labs Talent does not sell personal data of our customers to third parties for any purpose.

How do we store personal data?

Signal Labs Talent securely stores personal data in Azure Cloud at the following locations. US: Azure US East 2 and US Central
EU: Azure EU North and EU West

How do we secure the data?

We take appropriate precautions including organizational, technical, and physical measures to help safeguard against accidental or unlawful destruction, loss, alteration, and unauthorized disclosure of, or access to, the Personal Data we process or use. While we follow generally accepted standards to protect Personal Data, no method of storage or transmission is 100% secure. You are solely responsible for protecting your password, limiting access to your devices and signing out of websites and Services after your sessions.

Where does Signal Labs Talent transfer personal data?

To facilitate our business practices and delivery of our Services, personal data may be collected, accessed from, transferred to or stored in the United States or in other countries where we operate, including countries outside the EEA. Personal data may be accessed by Signal Labs Talent personnel providing Services in any country where we have facilities or in which we engage third party service providers (processors or sub-processors), including Ireland, the Netherlands, India, United Kingdom, and United States. In instances where we transfer personal data outside the EEA, we implement appropriate safeguards to ensure an adequate level of data protection, such as use of Standard Contract Clauses as approved by the European Commission, or taking other measures to ensure an adequate level of data protection under EU law.

What are personal data protection rights?

Data subjects in various jurisdictions have data protection rights.
EU/UK/Switzerland

Data subjects in the EEA are entitled to the following:

- **The right to access** - They have the right to request copies of their personal data from a Signal Labs Talent customer.
- **The right to rectification** - They have the right to request that a Signal Labs Talent customer correct any information they believe is inaccurate. They also have the right to request a Signal Labs Talent customer to complete information they believe is incomplete.
- **The right to erasure** - They have the right to request that a Signal Labs Talent customer erase their personal data, under certain conditions.
- **The right to restrict processing** - They have the right to request that an Signal Labs Talent customer restrict the processing of their personal data, under certain conditions.
- **The right to object to processing** - They have the right to object to an Signal Labs Talent customer's processing of their personal data, under certain conditions.
- **The right to data portability** - They have the right to request that a Signal Labs Talent customer transfer the data that we have collected to another organization, or directly to them, under certain conditions.

If you have questions about personal data you have entered into a Signal Labs Talent Service or want to exercise any of your rights regarding your personal data, the privacy laws and our customer contract requires that we redirect your inquiry back to that Signal Labs Talent customer. All requests by users to exercise their rights/delete their data will be forwarded to the respective Data Controllers and be dealt with according to the Data Controllers' direction.

NOTE: Anyone, including those outside of the jurisdictions specifically mentioned above, can make a request to have their data deleted

To begin this request please [click here](#).

California Residents

California residents have specific rights under California law regarding their personal information, including the right to request that we disclose certain information about our collection and use of their personal information over the past 12 months; the right to request that we delete their personal information that we have collected, subject to certain exceptions; and the right to opt out of the sale of their personal information. We are only required to respond to two such requests per individual each year. Individuals also have the right not to be discriminated against if they exercise any of their rights under California privacy law.

If an individual makes such a request, the Signal Labs Talent customer has one month to respond under normal circumstances. Signal Labs Talent will cooperate and assist its customers in the processing of this request at their direction. If an individual asks Signal Labs Talent directly to exercise one of these rights, Signal Labs Talent will notify its customer of the receipt of such request and direct them to the Signal Labs Talent customer.

Text Messaging Information

- By turning on text messaging, you are explicitly consenting to receive text messages about jobs from this company's Talent Gateway(s).
- If you opt-in: message and data charges may apply. Message frequency may vary. You can opt-out of messaging at any time by texting "STOP" or by logging into your profile and turning this setting off.

What are cookies?

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit our websites or use our Services, we may collect information from you automatically through cookies or similar technology.

For further information, visit allaboutcookies.org.

How do we use cookies?

Signal Labs Talent uses cookies in a range of ways to improve your experience on our websites or as part of the application services we provide, including:

- Track the logged in users' information (encrypted)
- Maintain state for load balancing and performance
- Track preferences and acknowledgements (e.g. consent to store cookies)

What types of cookies do we use?

There are a number of different types of cookies, however, our websites and services use:

- Functional - Signal Labs Talent uses these cookies so that we recognize you on our website and remember your previously selected preferences or maintain your logged in identity to our services. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.
- The services only use session cookies

- For more information about cookie usage in our websites see <https://brassring.com/privacy-policy/> (Website Privacy Policy)

How to manage cookies

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser.

However, in a few cases, some of our website features may not function as a result. However, disabling cookies will prevent the use of the Services.

Privacy policies of other websites

The Signal Labs Talent Services may contain links to other websites.

Our privacy policy applies only to our Services, so if you click on a link to another website, you should read their privacy policy.

Changes to our privacy policy

Signal Labs Talent keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 6 July 2023.

How to contact us

If you have any questions about Signal Labs Talent's privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

Or write to us at: 448 North LaSalle, Suite 9-107, Chicago IL 60654

Please [click here](#).

How to contact the appropriate authority

Should you wish to report a complaint or if you feel that Signal Labs Talent has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office
Phone: 0303 123 1113 (local) or +44 1625 545 745 (international). You can also learn more by visiting: <https://ico.org.uk/global/contact-us/>.