

Last updated: May 3, 2022

Volta Talent Strategies LLC is committed to protecting your privacy. This Privacy Policy describes our practices in connection with information that we collect through our websites located at www.voltapeople.com and www.voltacareercenter.com (collectively, the "Site").

This Privacy Policy applies only to our online information-gathering and dissemination practices through the Site, and does not apply to any of our practices conducted offline. If you have any questions or comments about the Privacy Policy or our privacy practices, please contact us at info@voltapeople.com.

IF YOU DO NOT UNDERSTAND OR DISAGREE WITH ANY PART OF THIS PRIVACY POLICY, DO NOT USE THIS SITE.

Visiting the public areas of our Site does not require you to provide any personally identifiable information, such as your name, address, email address, or phone number ("Personal Information"). The cookies used on the public areas of the Site do not gather Personal Information, although your computer's browser may automatically provide us with certain other information, such as the date and time of your visit, your computer's browser type, operating system and IP and any referring and exiting URLs.

PERSONAL INFORMATION WE MAY COLLECT

"Personal Information" is information that identifies you as an individual, such as your name, mailing address, telephone number and email address.

How We May Collect Personal Information

We and our service providers may collect Personal Information through the Site, e.g., when you sign up for any newsletter we publish or send us an email using our "Contact Us" page.

How We May Use Personal Information We may use Personal Information:

We may use Personal Information:

- To respond to your inquiries and fulfill your requests, such as to send you newsletters or publications that you request.
- To send you company updates and mailings relating to our ideas, services or events that we think may be of interest to you.
- To keep a record of your contact information and correspondence, and use it to respond to you, if you contact us through the Site.
- For our business purposes, such as data analysis, audits, fraud monitoring and prevention, enhancing, improving or modifying our services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

How Personal Information May Be Disclosed

Your Personal Information may be disclosed:

- To our third-party service providers that provide services such as website hosting, services- related consulting and monitoring, data analysis, information technology and related infrastructure, customer service, email delivery, auditing and other similar services.
- To identify you to anyone to whom you send messages through the Site.
- To a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

In Addition...

We may use or disclose Personal Information as we understand to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

Except as otherwise disclosed in this Privacy Policy, we will not sell, rent or transfer Personal Information to third parties without your consent.

OTHER INFORMATION WE MAY COLLECT

"Other Information" is any information that does not reveal your specific identity or does not directly relate to an individual, such as: Browser and device information;

- Site usage data and analytics;
- Information collected through cookies, pixel tags and other technologies; and
- Demographic information and other information provided by you.

How We May Collect Other Information

We and our third party service providers may collect Other Information in a variety of ways, including:

- Through your browser or device: Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language and Internet browser type and version. We use this information to ensure that the Site functions properly.
- Using cookies: Cookies are pieces of information stored directly on the computer that you are using. We may use cookies in connection with the Site.
- Using pixel tags and other similar technologies: Pixel tags (also known as web beacons and clear GIFs) may be used in connection with the Site to, among other things, track the actions of users of the Site, measure the success of our marketing campaigns and compile statistics about usage of the Site and response rates.
- IP Address: Your "IP Address" is a number that is automatically assigned to the computer that you are using by your Internet Service Provider (ISP). An IP Address may be identified and logged automatically in our server log files whenever a user accesses the Services, along with the time of the visit and the page(s) that were visited. Collecting IP Addresses is standard practice and is done automatically by many websites and applications. We use IP Addresses for purposes such as calculating usage levels of the Site, helping diagnose server problems and administering the Site.
- From you: Information such as your location, as well as other information, such as your preferred means of communication, is collected when you voluntarily provide this information. Unless combined with Personal Information, this information does not personally identify you or any other user of the Services.
- By aggregating information: Aggregated Personal Information does not personally identify you or any other user of the Services (for example, we may use aggregated Personal Information to calculate the percentage of our users who have a particular telephone area code).
- By using **Google Analytics**, which is a web analysis service provided by Google that collects usage and cookie data. Google utilizes the data collected to track and examine the use of www.voltapeople.com and www.voltacareercenter.com to prepare reports on its activities and share them with other Google services. Google may use the data collected to contextualize and personalize the ads of its own advertising network. Find Google's privacy policy here: www.google.com/policies/privacy/partners/

How We May Use and Disclose Other Information

Please note that we may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat Other Information as Personal Information under applicable law, then we may use it as described in "How We May Collect Other Information" section above, as well as for all the purposes for which we use and disclose Personal Information.

In some instances, we may combine Other Information with Personal Information (such as combining your name with your geographical location). If we combine any Other Information with Personal Information, the combined information will be treated by us as Personal Information as long as it is combined.

THIRD PARTIES

This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any site or service to which the Site links. The inclusion of a link does not imply endorsement of the linked site or service by us. We encourage you to read the privacy policies of other websites you link to from the Sites or otherwise visit.

SECURITY

We seek to use reasonable organizational, technical and administrative measures to protect Personal Information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us in accordance with the "Contacting Us" section below.

YOUR CHOICES

Your choices regarding our use of your Personal Information for marketing purposes

If you no longer want to receive marketing-related emails from us on a going-forward basis, you may opt-out of receiving these marketing-related emails by following the unsubscribe instructions in any such message or by contacting us by email at info@voltagepeople.com. We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you do opt out of receiving marketing-related emails from us, we may still send you important administrative messages, and you cannot opt out from receiving administrative messages.

How you can access, change or suppress your Personal Information

You may request to review, correct, update, suppress or otherwise modify any of your Personal Information that you have previously provided to us through the Services, or object to the use or processing of such Personal Information by us. You may exercise these rights by contacting us by email at info@voltagepeople.com.

Access and Change. We allow our users the option to access and obtain a copy of their Personal Information and to rectify such Personal Information if it is not accurate, complete or updated. However, we may first ask you to provide us certain credentials to permit us to identify your Personal Information.

To Delete Personal Information or Restrict Processing. You may request that we delete your Personal Information or restrict its processing. We may postpone or deny your request if your Personal Information is in current use for the purposes for which it was collected or for other legitimate purposes such as compliance with legal obligations.

Withdrawing Your Consent. You have the right to withdraw your consent to the processing of your Personal Information.

Right of Data Portability. Where technically feasible, you have the right to ask to transfer your Personal Information in accordance with your right to data portability.

In your request, please make clear what Personal Information you would like to have changed, whether you would like to have your Personal Information that you have provided to us suppressed from our database or otherwise let us know what limitations you would like to put on our use of your Personal Information that you have provided to us. For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes, and there may also be residual information that will remain within our databases and other records, which will not be removed.

ONWARD TRANSFER OF YOUR INFORMATION

Your information will be collected, processed, stored and used by us, and if/when applicable may be passed to and processed by our subsidiaries and/or affiliated companies. Information contributed by or collected from users may be stored and processed in any country in which we or our affiliates, subsidiaries or agents maintain facilities, and which may be outside of the European Economic Area. If there is a transfer of your Personal Information outside the EEA we will, in the absence of an EC Adequacy decision relevant to the destination country or to the transfer, seek to rely on appropriate safeguards such as a valid Privacy Shield certification, or enter into appropriate EC approved standard contractual clauses (see http://ec.europa.eu/justice/data-protection/international-transfers/transfer/index_en.htm). By using the Site, you acknowledge and agree that you may be transferring your information, including Personal Information, outside of the country in which you have contributed it, and that you consent to any such transfer of information outside of your country to a country that may not offer the same level of protection for information as the country in which you reside. We may have legal liability in cases of onward transfer to third parties of data from EU or Swiss individuals received pursuant to the EU-U.S. Privacy Shield and Swiss-U.S. Privacy Shield.

PRIVACY SHIELD NOTICE

We comply with the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks as set forth by the U.S. Department of Commerce regarding the transfer of Personal Information from the EU and Switzerland to the U.S. For purposes of this Privacy Shield Notice, "Personal Information" includes information that identifies, directly or indirectly, a client or consumer in the EU or Switzerland. Volta Talent Strategies LLC has self-certified to the U.S. Department of Commerce and declared its commitment to adhere to the Privacy Shield Principles of Notice; Choice; Accountability for Onward Transfer; Security; Data Integrity and Purpose Limitation; Access; and Recourse, Enforcement, and Liability (the "Principles").

You can learn more about Privacy Shield at <https://www.privacyshield.gov> and see our Privacy Shield self-certification at <https://www.privacyshield.gov/list>. Volta Talent Strategies LLC's self-certification to the Privacy Shield is subject to the investigatory and enforcement authority of the Federal Trade Commission.

We encourage EU and Swiss individuals who have questions or complaints about how we process their Personal Information under Privacy Shield to contact us at info@voltapeople.com. We will work to resolve your issue as quickly as possible, but in any event within 45 days of receipt. If you have an unresolved privacy or data use complaints that we have not addressed satisfactorily, please contact, free of charge, our dispute resolution provider, JAMS, at <https://www.jamsadr.com/eu-us-privacy-shield>. If you are an EU or Swiss individual and unable to resolve any complaints through any of the above methods, you may be able to invoke binding arbitration through a Privacy Shield panel, in accordance with the Privacy Shield Framework at <https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint>

RETENTION PERIOD

We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

USE OF SERVICES BY MINORS

The Sites are not directed to nor intended for use by any individual under the age of thirteen (13), and therefore such individuals are requested and advised not to provide Personal Information through the Sites.

SENSITIVE INFORMATION

You agree not send or disclose to us any sensitive Personal Information (e.g., Social Security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, or health) on or through the Site or otherwise to us unless specifically required in connection with an engagement for which there are agreed terms.

UPDATES TO THIS PRIVACY POLICY

We may change this Privacy Policy. Please take a look at the "Last Updated" legend at the top of this page to see when this Privacy Policy was last revised. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on the Site. When we make material changes to this Privacy Policy, we will notify you by using the email address you have provided to us. Your use of the Site following these changes means that you accept the revised Privacy Policy.

CONTACTING US

If you have any questions about this Privacy Policy, please contact us by email at info@voltagepeople.com, or please write to the following address:

Volta Talent Strategies LLC
Attn: Chief Executive Officer
1330 Avenue of the Americas, Floor 23
New York, NY 10019

Please note that email communications are not always secure; so please do not include sensitive personal or professional information in your emails to us through the Site.