

DC Data Vault Privacy Policy

Last Updated: May 24, 2022

PAIRIN Inc. (“**PAIRIN**”) hosts and operates DC Data Vault on behalf of the DC Workforce Investment Council (“**WIC**”). This DC Data Vault Privacy Policy (“**Privacy Policy**”) is designed to help you understand how PAIRIN and WIC (collectively, “**we**,” “**us**,” or “**our**”) collect, use, and share your personal information when you use DC Data Vault, the website located at <https://dc.pairin.com/>, or any other features or services operated by PAIRIN to which we post this Privacy Policy (collectively, the “**Platform**”).

As DC Data Vault evolves, we may update this Privacy Policy to reflect changes in our practices, whether to comply with then-applicable regulations and self-regulatory standards or otherwise. If revisions are made that change the way we collect, use, or share personal information, we will post those changes in this Privacy Policy. We encourage you to review this Privacy Policy periodically so that you keep up to date on our most current practices. Please see additional information regarding amending this Privacy Policy in the Section entitled "Changes to this Privacy Policy" below.

Personal Information We Collect

- **Information You Give Us.** Personal information you may provide through the Platform or otherwise communicate to us includes:
 - **Contact information**, such as your name, address, email address, and phone number.
 - **Account information** you provide to allow us to create and administer your account, such as your date of birth and user preferences.
 - **Demographic information**, such as your gender, ethnicity, marital status, household information, disability status, and veteran status .
 - **Employment information**, such as your employment status, need for employment services, employment history, and other details related to your current, prior, or future employment.
 - **Education information**, such as your education status, highest level of education completed, institutions you attended, transcripts, or any diplomas, certificates, credentials, or licenses you have earned.
 - **Your preferences and goals**, such as your coaching preferences, personal and professional goals, service availability, and language needs.
 - **Program eligibility information**, such as documentation that you upload when requesting certain programs or services.
 - **Correspondence**, such as information you provide when you request information from us or otherwise correspond with us.
 - **Other information** that we may collect that is not specifically listed here but which we will use in accordance with this Privacy Policy.
- **Information From Local Agencies, Education Programs, or Our Partners.** Some local agencies, education programs, or other Services partners may provide personal information to us, such as name, address, date of birth, gender, ethnicity, graduation year, credentials, education history, email address, program enrollment, assessment scores, and employment history. If a Services partner provides us this information about you, we will automatically include that information in your profile on the Platform.
- **Information Collected Automatically.** We and our third party service providers may automatically record certain information about how you use the Platform and the computers or devices you use to access the Platform, such as your Internet Protocol (IP) address, device identifier, approximate geographic location, date and time you access the Platform, pages visited and features used and the order of use, type of computer or other operating device accessing the Platform, browser type, referring source (meaning the

website you visit prior to visiting the Platform), and other similar information about your interactions with and the activities in which you engage while using the Platform. This information may be collected by cookies, plug-ins, web beacons and similar tracking technologies, including:

- o **Cookies**, which are text files that websites store on a visitor's device to uniquely identify the visitor's browser or to store information or settings in the browser for the purpose of helping you navigate between pages efficiently, remembering your preferences, enabling functionality, and helping us understand user activity and patterns. For example, we use third-party services provided by Google Analytics to track and analyze your activity on the Platform. You can learn more about Google Analytics cookies by clicking [here](#) and about how Google protects your data by clicking [here](#). We may also use third-party widgets on the Platform. When you use these third-party widgets by using features of the Platform, the widgets may place cookies associated with these widgets on your computer or other operating device.
- o **Web beacons**, also known as pixel tags or clear GIFs, which are typically used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked, typically to compile statistics about usage of websites and the success of marketing campaigns.

How We Use Your Personal Information

We use your personal information for the following purposes and as otherwise described in this Privacy Policy or at the time of collection:

- **To Operate the Platform.** We use your personal information to provide, operate and improve the Platform, to communicate with you about the Platform (including by sending you announcements, updates, security alerts, and support and administrative messages), to understand your needs and interests, to personalize your experience with the Platform, and to respond to your requests, questions, and feedback related to the Platform. Depending on how you use the Platform, this may include the use of your personal information to help you connect to workforce resources. At your direction, we may also communicate your requests for information or material to partners in the District that can support you.
- **For Research and Development.** We analyze use of the Platform to study trends and users' movements around the Platform, gather demographic information about our user base, improve the Platform, and develop new products and services.
- **To Communicate With You and Connect You With Partners.** We may use your personal information to send you communications via email or other means, and to submit any referrals or other communications to partners that you choose to connect with via the Platform.
- **To Create Anonymous Data.** We may create aggregated and other anonymous data from our users' information. We make personal information into anonymous data by removing information that makes the data personally identifiable. We may use this anonymous data and share it with third parties to understand and improve the Platform, measure impact, and for other lawful business purposes.
- **For Compliance, Fraud Prevention and Safety.** We may use your personal information and share it with government officials, law enforcement or private parties, as we believe appropriate to protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims), to protect against, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, to comply with applicable laws, court orders, subpoenas and other legal process, and requests from government authorities, and where permitted by law in connection with a legal investigation.
- **With Your Consent.** In some cases we may specifically ask for your consent to collect, use or share your personal information, such as when required by law. If you are under 18, in some cases we may ask for parental consent.

How We Share Your Personal Information

We may share your personal information with the following parties and as otherwise described in this Privacy Policy or at the time of collection:

- Administration and Staff of Services Partners. Your account is meant to connect you to and help you connect you to workforce programs throughout the District of Columbia. If you connect your account to an agency, workforce center or other Services partners using the Platform as part of a career, job, and education planning program, then professional staff at that agency or site designated by the administration of the agency or site to have access to your personal information so that they may assist you in a guidance capacity with your workforce preparation. If you choose to not connect your account to an agency or site, then you will not be able to make full use of the Platform.
- As Directed by You. Any time you request that we perform a task that involves a transfer of personal information, the information related to the performance of that task will be made available to a recipient you designate. For example:
 - o If you express interest in a resource displayed on the Platform, your personal information will be shared with the relevant partner.
 - o If you request that a company receive specific information you have directed to be sent to them for a job or internship application.
- Professionals. As part of the Platform, you may have the opportunity to connect with professionals to help you connect to education, career, and support resources, and otherwise provide assistance in connection with the Platform.
- Replacement Vendor. In the event that WIC decides to internally operate or hire a new party (other than PAIRIN) to operate a site similar to the Platform or that otherwise replaces the Platform, WIC may use your personal information in connection with such replacement site and/or share your personal information with the new operator of the replacement site.
- Required by Law. We may share personal information with law enforcement agencies if we reasonably believe unlawful activities have occurred or the personal information may aid in an ongoing investigation. We may also share personal information with law enforcement if we determine, in our sole judgment, that you have violated our agreements or policies or that the release of your personal information may protect the rights, property, interests, or safety of us or any third party. We may share personal information as required by, or permitted by, law, whether in response to subpoenas, court orders, other legal processes, or as we believe is necessary to exercise our legal rights, including defending against legal claims that have been or might be brought against us.
- Business Transfers. PAIRIN may sell, transfer, or otherwise share some or all of our business or assets, including personal information, in connection with a business deal (or potential business deal) such as a corporate divestiture, merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy or dissolution of PAIRIN.
- Service Providers. We may share your personal information with service providers that perform services for PAIRIN. These services are used for the operation of our business and in the operation of the Platform, such as email delivery, IT providers, hosting, technical support, analytics services, and legal and other professional advice.
- Affiliates. PAIRIN may share personal information with its affiliates and subsidiaries, including companies that PAIRIN owns or controls, that own or control PAIRIN, or that are under common ownership or control with PAIRIN, regardless of whether these companies share PAIRIN's same name.

Your Choices

Users have the following choices in connection with the Platform:

- **Modify or Remove Account Information.** You may update the personal information that you previously provided to your account on the Platform by logging into your account and updating your profile. If you want to remove personal information that is in a required field (and not replace it with other data), you will need to contact support@pairin.com and request that your account be inactivated. Please recognize that if you delete information, it will no longer be available on the Platform so that, for example, if an employer to which you previously submitted an application were to attempt to retrieve that application from the Platform after you made the deletion, the deleted information would no longer be accessible. Similarly, when accessed over the Platform, personal information that has been updated or otherwise modified will appear in its then current form, rather than in the form in which it may have been submitted at some earlier time. Please note that if you modify or delete any personal information, we may retain the earlier-submitted personal information.
- **Opt out of emails.** You may be able to opt out of certain email communications from us by following the unsubscribe instructions in the email.
- **Cookies and similar technologies.** Most browsers let you remove or stop accepting cookies from the websites you visit. To do this, follow the instructions in your browser's settings. Many browsers accept cookies by default until you change your settings. If you do not accept cookies, however, you may not be able to use all functionality of the Platform and it may not work properly. For more information about cookies, including how to see what cookies have been set on your browser and how to manage and delete them, visit www.allaboutcookies.org.

We use Google Analytics on the Platform. You can prevent the use of Google Analytics relating to your use of the Platform by downloading and installing a browser plugin available from Google [here](#).

- **Do Not Track.** Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" or similar signals. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

Children

The Platform is not intended for anyone under the age of 13. If you are a parent or guardian and believe we may have collected personal information from a child under the age of 13, please contact us so that we can delete the child's information.

Third Party Sites and Services

The Platform may contain links to other websites and services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any third party. We do not control third party websites, applications or services, and are not responsible for their actions. Other websites and services follow different rules regarding their collection, use and sharing of your personal information. We encourage you to read their privacy policies to learn more.

Security

The security of your personal information is important to us. We employ a number of reasonable organizational, technical, and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your personal information. If you have a user account for the Platform, you are solely responsible for maintaining and protecting the confidentiality of your account password and other account information in your possession.

Retention and Storage

We will retain your personal information in our databases and applications to fulfill the purpose for which the information was collected. Because DC Data Vault is intended to connect you education, career and support resources, the personal information you put into DC Data Vault will be retained until you ask us to remove your information. Note that even after you ask that we remove your personal information from our databases, it may be impossible to remove some personal information, such as personal information tracked in our web server log files

and personal information that may reside in backup files. Personal information may also be required to be retained for other purposes, such as to comply with applicable laws, rules, regulations, or guidelines; to prevent fraudulent activity; to protect ourselves against liability; to resolve disputes; to comply with WIC's requirements; and to enforce our contractual or other rights.

International Data Use

We are headquartered in the United States and have affiliates and service providers in other countries, and your personal information may be collected, used and stored in the United States or other locations outside of your home country. Privacy laws in the locations where we handle your personal information may not be as protective as the privacy laws in your home country.

Changes to this Privacy Policy

We may amend this Privacy Policy from time to time. We will post any updated Privacy Policy here, and you should review this page regularly to make sure you are aware of its terms. You can determine if this Privacy Policy has been revised since your last visit to the Platform by referring to the "last updated" date at the top of this Privacy Policy. If we make any substantial changes to this Privacy Policy, we may also notify you through the Platform, via email, or using another method. In all cases, your continued use of the Platform after we post an updated Privacy Policy means that you accept any changes made in the updated Privacy Policy.

How to Contact Us

Please direct all questions or comments about this Privacy Policy to privacy@pairin.com, support@pairin.com, or the address below:

PAIRIN Inc.
Attn: Privacy
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