

Gateway Privacy Policy

LAST UPDATED 12/31/2024

About this Privacy Policy and Our Commitment to Your Privacy

This Privacy Policy (these "Policy" or these "Terms") sets forth the terms upon which GreenCompany Inc., a Virginia limited liability company d/b/a/ Gateway, located at 7950 Jones Branch Dr., Floor 8, McLean, VA 22102 (or "Gateway", "we", "us", or "our") collects information from you, our clients (each, a "Client", "you" or "your"), and how we may use and disclose this information when you access our website located at app.careergateway.io (including any successor site) (the "Website" or "Site" or "Platform"). By accessing the Website and/or utilizing our onboarding and training services (the "Services"), which assist employers in training their workforce and aligning company goals and visions, you agree to be bound by these Terms.

Your Consent to this Privacy Policy by Using the Site

As described in this Privacy Policy, we may use and disclose your information to provide you with products and services and to improve your experience using those products and services. By using the Site, or any other website, or online service where this Privacy Policy is posted, you agree to our collection, use, disclosure, and storage of information as described in this Privacy Policy. We reserve the right to update this Privacy Policy at any time to reflect changes in our practices or for legal, operational, or regulatory reasons. Any updates will be posted on this page with a revised "Last Updated" date.

Your continued use of our Site or Services after any changes to this Privacy Policy constitutes your acceptance of the updated policy. If you do not agree with the changes, you should discontinue your use of our Site and Services. For material changes that significantly affect your rights or how we use your personal information, we may require you to provide explicit consent by acknowledging the updated policy before continuing to use our Services.

Third-Party Advertising on Our Site

We do not allow third parties to advertise to Candidates on our Site, unless you provide consent, which is not requested in this Privacy Policy.

How to Contact Us with Questions about this Privacy Policy

Please read this Privacy Policy carefully. If you have questions or complaints regarding our Privacy Policy or privacy practices, please contact us at: Attn: Privacy Concerns, Gateway, 7950 Jones Branch Dr., Floor 8, McLean, VA 22102 or email hanhlinh@careergateway.io. You have

the right to request the erasure of your personal data at any time, subject to any legal obligations we may have to retain certain information. To exercise this right, please contact us using the information provided above.

Information Addressed by this Privacy Policy

We want you to have a clear understanding of the information addressed by this Privacy Policy. We will collect information about you (“Information”) in a variety of ways, including directly from you, through automatic means, or from third parties. The Information that is collected depends on how you use the Site.

Personal Information and Privacy

When you use our Service, Clients who desire to use our onboarding and training services may provide us with information about their employees or consultants, including Client Materials. These materials, which are necessary for us to provide our services, may contain a great deal of personal Information. By providing these materials, you grant Gateway a license to use these materials for the purpose of developing and delivering Training Content. Our goal is to balance our Clients’ need to provide enough Information requisite for us to deliver our services against their employees’ or consultants’ desire for a measure of privacy. We adhere to the principle of data minimization, retaining only the information necessary for the specified purpose and for the duration required to fulfill that purpose.

Information You Provide Directly to Gateway

When you use the Site, you may provide certain information directly to us. For example, without limitation, when you choose to register an Account, you may be required to provide, among other things, your e-mail address, name, and phone number. When you utilize our Services, we may collect information about your employees or consultants. We use this information to tailor our onboarding and training services to meet your needs.

Certain Information in the Services is Not Visible to Other Candidates

Client Information provided to us is not publicly visible to other Clients. Clients may willfully transmit Information to other Clients via our platform.

Information that is Automatically Collected

We and third parties may use automated means to collect information about you, your computer or other device that you used to access the Site, and your use of the Site. These automated means

include common technologies such as cookies or similar technologies. These technologies help us analyze trends, administer the Site, track Candidates' movements around the Site, gather demographic information about our user base as a whole, and otherwise provide you with relevant content (e.g., by gathering your zip or postal code). We may receive reports on an individual as well as aggregated basis based on the use of these technologies by Gateway, and any third-party vendors acting on Gateway's behalf.

Information We Collect from Third Parties

Gateway enters into business relationships with Providers. When you use the Services, we may collect information about you, directly or indirectly, from or through applicable Gateway Providers. With your consent, we may also collect Information from other third parties. Furthermore, Gateway may use Client Materials to train its AI models, provided that such use complies with privacy standards and does not involve sharing or accessing identifying or sensitive data of clients. Gateway commits to conducting regular reviews and audits of its international data transfer practices to ensure ongoing compliance with applicable data protection laws and regulations. These audits will be performed at least annually or more frequently if required by law.

Updates to retention periods: Gateway reserves the right to modify our data retention periods in response to changes in legal requirements, regulatory guidelines, or internal policies. We will notify users of any significant changes to our retention practices through our website or other appropriate communication channels. It is recommended that users periodically review our Privacy Policy to stay informed about our current data retention practices. Data retention audits:

Gateway is committed to ensuring compliance with data protection regulations and our own privacy policies. We conduct regular internal audits of our data retention practices at least once a year. These audits review our data storage, processing, and deletion procedures to ensure they align with our stated policies and applicable laws. The results of these audits are used to refine and improve our data handling processes as needed.

Cookies and Tokens

Cookies are files that websites send to your computer or other Internet-connected device to uniquely identify your browser or to store information or settings on your device. Our Site may use HTTP cookies, HTML5 cookies, Flash cookies and other types of local storage (such as browser-based or plugin-based local storage, or application-based local storage on a mobile device). We use cookies for purposes such as analytics, personalization, and enhancing site functionality. You may be able to restrict or disable certain cookies. Please note, however, that without cookies, you may not be able to use all of the features of our Site.

We may update our cookie policy from time to time. Any changes will be posted on this page and, where appropriate, notified to you by email. We encourage you to periodically review this page for the latest information on our cookie practices.

Our cookies, tokens and similar technologies (collectively, “Tracking Technologies”) also are used for administering the Site, including without limitation, for authentication, to remember Employers' settings, to customize the content and layout of the Site for Employers, to contact you about the Site, and to improve our internal operations, the content of our Site and our services. Candidates may be able to control the use of, or reject or disable, some Tracking Technologies at the individual browser level. If you reject or disable Tracking Technologies, you may still use our Site, but your ability to use some features or areas of our Site may be limited. We use Tracking Technologies to identify your device and keep track of your Internet session with our Site. Using these Tracking Technologies, we may automatically end your session on our Site after a period of inactivity (as determined by us in our sole discretion). We also use Tracking Technologies that allow us to recognize your device when you return to the Site within a certain period of time (as determined by us in our sole discretion) and automatically log you back into your account with us. UNLESS YOU AFFIRMATIVELY LOG OUT of your account PRIOR TO YOUR SESSION ENDING (whether by you or by us), YOU WILL BE AUTOMATICALLY LOGGED BACK IN THE NEXT TIME YOU OR ANY END-USER OF YOUR DEVICE VISITS OUR SITE within the period of time determined by us. If you do not wish to be automatically logged back in when you (or someone using your device) next initiate a session with our Site (using the same device that is being used for your current session), you should log out of your account (i) prior to ending your session, or (ii) if you will be inactive on our Site for more than a few minutes.

Web Logs

In conjunction with the gathering of data through cookies, Web servers may log records such as your device type, operating system type, device advertising identifier, browser type, domain, and other system settings, as well as the language your system uses and the country and time zone where your device is located. The Web server logs also may record the address of the Web page that referred you to our Site, the IP address (and associated city and state or province for the IP address) of the device you use to connect to the Internet, and data about your interaction with our Site, such as which pages you visit.

Pixels/Web Beacons

To control which Web servers collect information by automated means, we may place tags on our Web pages or in our app called “Web beacons” (or “pixels”), which are files that associate certain behavior with a session or user. We also may include Web beacons in e-mail messages to record whether an email has been opened or whether certain links in such email have been clicked. We or third parties also may send instructions to your device using JavaScript or other

computer languages to store or gather the sorts of data described above and other details about your interactions with the Site. We may use third party pixels on the Site's registration and login pages. For example, we may use these pixels to assess your progress in registering for our Site. If you start but fail to complete the registration process, we may also use third party pixels to deliver reminders to complete your registration. We may also use these pixels to deliver notices about new and existing features on our Site. These reminders and notices may appear on other websites, and third parties who provide the pixels may use the information obtained from pixels for their business purposes.

Online Analytics

We may use third-party web analytics services on our Site, such as those of Google Analytics. These service providers use the sort of technology described in this "Information that is Automatically Collected" section to help us analyze how Employers use the Site, including by noting the third-party Web site from which Employers arrive. The information (including your IP address) collected by the technology will be disclosed to or collected directly by these service providers, who use the information to evaluate your use of the Site.

Mobile Application Technologies

Our mobile applications may also collect information specific to use of your mobile device, such as unique device identifier and, with your consent, precise geolocation information, motion coprocessor data (e.g. recording information such as steps, distance, and elevation), accelerometer data (showing whether you're stationary or moving), and gyroscope data. We may also use third-party analytics, such as those of Google Analytics.

Collection of Information Across Personal Devices and Applications

Sometimes, we (or our service providers) may use the information we collect—for instance, log-in credentials, IP addresses, hashed email addresses, and unique mobile device identifiers—to locate or try to locate the same unique users across multiple browsers or devices (such as smartphones, tablets, or computers), or work with providers that do this, in order to better tailor content, features, and advertising (for Gateway on other sites), and provide you with a seamless experience across the devices you use to access our services.

Our Use of Information

Use and Storage of Information to Provide You with the Site and Related Services

Gateway, and any third party vendors acting on Gateway's behalf, may use and store your Information to perform activities associated with providing you with the Site and related services

such as: (i) registering you to use the Site and otherwise logging you into the Site, including the authentication of your identity, where applicable, and otherwise enabling your access to the Site; (ii) resolving disputes and/or troubleshooting problems including logging into your account to troubleshoot problems or otherwise help you navigate the Site; (iii) verifying your compliance with your obligations in our Terms of Service or other Gateway policies; (iv) improving the quality of the Site, (v) fulfilling any request you make; (vi) communicating with you; (vii) connecting you with and providing you with information about services, providers of services, resources or programs to which you may have access; (viii) providing you with Site content, including, without limitation, generating recommendations (such as recommended Site activities or services), providing onboarding and training services, helping employers align their workforce with company goals and visions, and processing your preferences and requests; (ix) analyzing, customizing, and personalizing the Site, including through the delivery of tailored content and communications; (x) using Client Materials to develop and deliver Training Content and train AI models, provided such use is in compliance with privacy standards and does not involve sharing or accessing identifying or sensitive data of clients; and (xi) otherwise as directed by you or provided for herein. Except where prohibited by law, and only to the extent permitted by Gateway's agreements with applicable Gateway Providers, we may also use your Information in connection with any other services we make available to you.

Additional Information Regarding Use of Information for Communications with You

Gateway, Gateway Providers, and any third-party vendors acting on Gateway's behalf, may also use your Information to communicate with you (including, without limitation, via email and/or mobile push notifications) about the Site and/or our products and services (and related features and functionality) or those of any Gateway Provider that is providing services to you. Our communications to you will include, without limitation, contacting you by SMS text message or at the email address(es) that you use to register for our Site to communicate with you regarding the Site and actions that you take in connection with the Site.

Your Choices Regarding Our Communications with You

In accordance with applicable law, we will offer you the opportunity to opt out of certain communications, such as, for example, communications that deal with any of our products or services you are not using but that we think might be of interest to you. Where applicable, you can opt out by emailing us at hanhlinh@careergateway.io. However, even if you opt out of such communications, you may continue to receive other transactional, relationship, and/or administrative communications from or through Gateway that are important or related to your Gateway account or the products and services you are using (such as, for example, a notice that there has been a change in one of your services or a change to this Privacy Policy). Please also note that you, not Gateway, have control over certain settings for how communications such as emails and push notifications are displayed on your devices, and the settings you select will affect how Gateway's communications are displayed.

Creation and Use of Combined Data, De-Identified Data, and Aggregated Data As permitted by

law and by Gateway's agreements with applicable Gateway Providers, Gateway, and any third-party vendors acting on Gateway's behalf, may aggregate and/or de-identify your Information and/or combine your Information with other information maintained or available to Gateway and use or disclose such information as follows:

We may use aggregated or combined data to communicate with you about the Site and/or our products and services and disclose such aggregated or combined data to Gateway Provider in connection with providing the Site. We may also use and disclose de-identified data, de-identified

aggregated data, and/or

de-identified combined data for any business purpose, which may include, without limitation, improving our products and services, conducting analytics such as evaluating our Site and developing additional benefits, programs, and services. This includes using Client Materials to train our AI models in a manner that complies with privacy standards and does not involve sharing or accessing identifying or sensitive data of clients. We may also disclose de-identified data to Gateway Provider for analytics purposes.

Disclosure of Information. We may share your Information in the following circumstances:

Disclosures to Service Providers and Gateway Providers With the limited exceptions discussed

below, we do not share your information with third parties, unless you tell us to. We will not share your personal information under any circumstance with any third parties for the purpose of allowing them to conduct direct marketing to you. In this section, we describe the potential uses of your information in greater detail.

With Third Parties That Request: As stated above, we primarily share your information, including your personal information, with third parties for the purpose of providing onboarding and training services to employers. Specifically, at the direction of the employers, we will submit your information to the appropriate third parties for purposes of facilitating your onboarding or training. For example, if your employer has requested a specific training program, then we will share your information, as provided by your employer and supplemented by Gateway, with third parties that work with Gateway to provide the training program. The third party's use of your personal information will be governed by the third party's own terms of service and privacy policy, not Gateway's; Gateway does not have any control over your information once it is submitted to a third party for training purposes. While we work with reputable third-party service providers, we cannot represent how any of them will use your personal information in connection with their Services, and recommend that you review their terms of use and privacy policies before requesting their services.

To Perform Services on Our Behalf: We may hire vendor companies to provide limited services on our behalf, such as payment processing, background checks, sending postal and electronic

mail, providing technical support, and to assist us in providing the products and services that you request from us. We only provide those service providers with the information necessary to perform the requested service.

Additional Disclosures with Your Consent

With your consent outside of this Privacy Policy, we may share your Information with third party Providers or allow them to collect information from the Website in some ways not specifically described in this Privacy Policy.

Safety, Security and Compliance with Law

Your Information and the contents of your communications through the Site may be disclosed to third parties as required by law, such as to comply with a subpoena or similar legal process, or when we reasonably believe disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, report improper or unlawful activity, or respond to a government request.

Subsidiaries and Affiliated Companies

Except where prohibited by law or precluded by contract, we may share your Information with any subsidiaries or other affiliated companies under the control of, or under common control with, Gateway for the purposes set out in this Privacy Policy.

Sale, Merger or Similar Transaction

We may share your Information in connection with any proposed or actual merger, reorganization, a sale of some or all our assets, a financing or acquisition of all or a portion of our business by another company, or to a receiver, trustee or successor in interest in bankruptcy, in which case such company may continue to process your Information as set forth in this Privacy Policy (except where prohibited by law) or otherwise with your consent.

We Do Not Control the Privacy Policies of Third Parties

Our Site may contain links that enable you to visit or use other third-party websites, resources or programs. However, we do not have control over the other websites, resources, or programs that you choose to visit, so this Privacy Policy does not apply to information collected or that you provide while visiting such other websites, resources, or programs. You should refer to the privacy policies, if any, applicable to the other websites, resources, or programs.

Data Security and Integrity

The security of your Information is important to us. We follow security standards to protect the Information submitted to us from loss, interference, misuse, unauthorized access, disclosure, alteration or destruction, both during transmission and once we receive it. This includes ensuring that any data used for AI training is anonymized or de-identified and complies with this privacy policy. These safeguards vary based on the sensitivity of the Information that we collect, process and store and the current state of technology. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security. We also maintain procedures to help ensure that such data is reliable for its intended use and is accurate, complete and current. If you have any questions about data security and integrity on our Site, you can contact us at hanhlinh@careergateway.io.

Be Sure to Log Off When Using Public or Third-Party Computers

As described above, we use Tracking Technologies that automatically log you back into your account with us unless you affirmatively log out of your account prior to your session ending (whether you end your session or we end your session, for example if our Site has “timed out” – i.e. we have ended your session automatically after a period of inactivity as determined by us in our sole discretion). If you log into the Site using a public computer or device, or a computer or device of that belongs to or is shared with another person, you should affirmatively log out of your account. Otherwise, the next user of that computer or device may be able to access your account and your Information in your account if your session has not ended.

Managing and Updating Information

To access, review, update and/or delete certain Information, you may contact us at hanhlinh@careergateway.io, and you may update and/or delete certain Information by logging into the Site and updating your account. We will respond to your request within a reasonable and lawful timeframe under the circumstances of your request. Please remember, however, if we have already disclosed some of this Information to third parties, we cannot access that Information any longer and cannot force the deletion or modification of any such Information by the parties to whom we have made those disclosures. Additionally, if you modify certain Information on our Site that we received from a third party, we reserve the right, but are not obligated, to share the updated information back to that third party. As a result, you will need to provide updated information to those third parties if you want to be sure they have your updates.

Certain Information is necessary in order for us to provide the Site and our related Services; therefore, if you delete such necessary Information you will not be able to use the Site or receive our Services related to onboarding and training for employers' workforce. In the course of providing these services, we may use your information to develop and deliver Training Content

and to train our AI models, in compliance with privacy standards and without accessing sensitive or identifying data. If you wish to have your account deactivated, you may contact us at hanhlinh@careergateway.io. After we receive your request, within a reasonable timeframe under the circumstances of your request, we will deactivate your account; provided, however, that: 1) All accounts owing payment have been adequately settled; 2) Gateway (and our third-party vendors acting on our behalf), our Gateway Provider, and any other applicable third parties may continue to use and share for any purpose de-identified data and aggregated or combined data developed using your Information that has been de-identified; and 3) Gateway may continue to use Information in your deactivated account for compliance with applicable regulations. Also, please note that even though you may deactivate your account or request the deletion of your Information, we may be required (by law or otherwise, such as to prevent fraud, resolve disputes, or troubleshoot problems) to retain this information, in which case we will comply with your deletion request only after we have fulfilled such requirements. We may also keep a copy of your Information to protect our legal rights, such as in connection with your use of the Site or your agreement to our Terms of Service, as permitted or required by applicable law.

California Do-Not-Track Disclosure Requirements (for California Candidates)

We are committed to providing you with meaningful choices about the information collected on our Site for third-party purposes. However, we do not recognize or respond to browser-initiated Do Not Track signals, as the Internet industry is currently still working on Do Not Track standards, implementations, and solutions.

We will provide a list of the categories of personal information, if any, disclosed to third parties during the immediately preceding calendar year for third-party direct marketing purposes, along with the names and addresses of these third parties. This request may be made no more than once per calendar year. We reserve our right not to respond to requests submitted other than to the email or postal address specified above. You should put "California Privacy Rights" in the subject line and in your request. You must provide us with specific information regarding yourself so that we can accurately respond to the request. We acknowledge the California Consumer Privacy Act (CCPA) and comply with its requirements for businesses collecting personal information from California residents, including but not limited to the right to know, the right to delete, and the right to opt-out of the sale of personal information. California law permits customers of Gateway who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please write us:

Gateway

7950 Jones Branch Dr., Floor 8, McLean

VA 22102

Email: hanhlinh@careergateway.io.

We will provide a list of the categories of personal information, if any, disclosed to third parties during the immediately preceding calendar year for third-party direct marketing purposes, along with the names and addresses of these third parties. This request may be made no more than once per calendar year. We reserve our right not to respond to requests submitted other than to the email or postal address specified above. You should put “California Privacy Rights” in the subject line and in your request. You must provide us with specific information regarding yourself so that we can accurately respond to the request.

Retention of Personal Data

Personal data will be retained only for so long as reasonably necessary for the purposes set out in this Privacy Policy, including the development and delivery of Training Content and the training of AI models. We consider criteria such as applicable rules on statute of limitations and at least the duration of your use of our Site and Services. Information may persist in copies made for backup and business continuity purposes for additional time. We ensure that any data used for AI training is anonymized or de-identified and complies with this privacy policy. For users in the European Union, we comply with the General Data Protection Regulation (GDPR) in our data processing activities. In compliance with GDPR requirements, we maintain a record of processing activities for personal data under our responsibility. For users in Canada, we comply with the Personal Information Protection and Electronic Data Documents Act (PIPEDA) in our collection, use, and disclosure of personal information. For international data transfers, we comply with applicable legal requirements, including the use of Standard Contractual Clauses (SCCs) or other approved transfer mechanisms, to ensure the protection of personal data transferred across borders

Modifications to this Privacy Policy

From time to time, we may update this Privacy Policy to reflect changes to our information practices. If we make changes to this Privacy Policy, they will be reflected in an updated Privacy Policy that will be posted on the Site, and all changes will be effective upon such posting or upon any later date specified by us in writing. We encourage you to periodically review this page for the latest information on our privacy practices. You can determine when this Privacy Policy was last revised by referring to the “Effective Date” legend at the top of this Privacy Policy. By continuing to use the Site or any services following the effective date of any updated Privacy Policy, you are agreeing to be bound by the terms and conditions of such updated Privacy Policy.

Contact

Email: hanhlinh@careergateway.io
Phone: (571) 281-8928
Mail: Gateway

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