

# Cookie Policy of [www.smartrecruiters.com/](http://www.smartrecruiters.com/)

To find more information on California consumers and their privacy rights, Users may [read the privacy policy](#).

To find more information on Virginia consumers and their privacy rights, Users may [read the privacy policy](#).

To find more information on Colorado consumers and their privacy rights, Users may [read the privacy policy](#).

To find more information on Connecticut consumers and their privacy rights, Users may [read the privacy policy](#).

To find more information on Utah consumers and their privacy rights, Users may [read the privacy policy](#).

This document informs Users about the technologies that help this Application to achieve the purposes described below. Such technologies allow the Owner to access and store information (for example by using a Cookie) or use resources (for example by running a script) on a User's device as they interact with this Application.

For simplicity, all such technologies are defined as "Trackers" within this document – unless there is a reason to differentiate. For example, while Cookies can be used on both web and mobile browsers, it would be inaccurate to talk about Cookies in the context of mobile apps as they are a browser-based Tracker. For this reason, within this document, the term Cookies is only used where it is specifically meant to indicate that particular type of Tracker.

Some of the purposes for which Trackers are used may also require the User's consent. Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.

This Application uses Trackers managed directly by the Owner (so-called "first-party" Trackers) and Trackers that enable services provided by a third-party (so-called "third-party" Trackers). Unless otherwise specified within this document, third-party providers may access the Trackers managed by them.

The validity and expiration periods of Cookies and other similar Trackers may vary depending on the lifetime set by the Owner or the relevant provider. Some of them expire upon termination of the User's browsing session.

In addition to what's specified in the descriptions within each of the categories below, Users may find more precise and updated information regarding lifetime specification as well as any other relevant information — such as the presence of other Trackers — in the linked privacy policies of the respective third-party providers or by contacting the Owner.

## Activities strictly necessary for the operation of this Application and delivery of the Service

This Application uses so-called "technical" Cookies and other similar Trackers to carry out activities that are strictly necessary for the operation or delivery of the Service.

### First-party Trackers

Storage duration: up to 6 months

### Third-party Trackers

## Tag Management

This type of service helps the Owner to manage the tags or scripts needed on this Application in a centralized fashion. This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

### Google Tag Manager (Google LLC)

Google Tag Manager is a tag management service provided by Google LLC.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – [Privacy Policy](#).

## Collection of privacy-related preferences

This type of service allows this Application to collect and store Users' preferences related to the collection, use, and processing of their personal information, as requested by the applicable privacy legislation.

### iubenda Consent Database (iubenda srl)

The iubenda Consent Database allows to store and retrieve records of Users' consent to the processing of Personal Data, and information and preferences expressed in relation to the provided consent.

In order to do so, it makes use of a Tracker that temporarily stores pending information on the User's device until it is processed by the API. The Tracker (a browser feature called localStorage) is at that point deleted.

Personal Data processed: Data communicated while using the service and Trackers.

Place of processing: Italy – [Privacy Policy](#).

Storage duration:

- ConS JS library localStorage (IUB\_DATA): indefinite

### **iubenda Privacy Controls and Cookie Solution (iubenda srl)**

The iubenda Privacy Controls and Cookie Solution allows the Owner to collect and store Users' preferences related to the processing of personal information, and in particular to the use of Cookies and other Trackers on this Application.

Personal Data processed: Trackers.

Place of processing: Italy – [Privacy Policy](#).

Storage duration:

- \_iub\_cs-\*: 1 year
- usprivacy: 1 year

## **Other activities involving the use of Trackers**

### **Experience**

This Application uses Trackers to improve the quality of the user experience and enable interactions with external content, networks and platforms.

### **Access to third-party accounts**

This type of service allows this Application to access Data from your account on a third-party service and perform actions with it. These services are not activated automatically, but require explicit authorization by the User.

#### **GitHub account access (GitHub Inc.)**

This service allows this Application to connect with the User's account on GitHub, provided by GitHub Inc.

Personal Data processed: device information, email address, Trackers and Usage Data.

Place of processing: United States – [Privacy Policy](#).

### **Displaying content from external platforms**

This type of service allows you to view content hosted on external platforms directly from the pages of this Application and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

#### **Wistia widget (Wistia, Inc.)**

Wistia is a video content visualization service provided by Wistia, Inc. that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – [Privacy Policy](#).

#### **Google Fonts (Google LLC)**

Google Fonts is a typeface visualization service provided by Google LLC that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – [Privacy Policy](#).

## Measurement

This Application uses Trackers to measure traffic and analyze User behavior to improve the Service.

### Analytics

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

#### Meta Events Manager (Meta Platforms, Inc.)

Meta Events Manager is an analytics service provided by Meta Platforms, Inc. By integrating the Meta pixel, Meta Events Manager can give the Owner insights into the traffic and interactions on this Application.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt out](#).

Storage duration:

- `_fbp`: 3 months

#### Google Analytics 4 (Google LLC)

Google Analytics 4 is a web analysis service provided by Google LLC (“Google”). Google utilizes the Data collected to track and examine the use of this Application, 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.

In Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data center or server. Users can learn more by consulting [Google’s official documentation](#).

Personal Data processed: Trackers.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#).

Storage duration:

- `_ga`: 2 years
- `_ga_*`: 2 years

### Heat mapping and session recording

Heat mapping services are used to display the areas of this Application that Users interact with most frequently. This shows where the points of interest are. These services make it possible to monitor and analyze web traffic and keep track of User behavior.

Some of these services may record sessions and make them available for later visual playback.

#### Crazy Egg (Crazyegg)

Crazy Egg is a heat mapping service provided by Crazy Egg, Inc.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – [Privacy Policy](#).

## Marketing

This Application uses Trackers to deliver personalized marketing content based on User behavior and to operate, serve and track ads.

### Advertising

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on this Application, possibly based on User interests.

This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below. Some of the services listed below may use Trackers to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User's interests and behavior, including those detected outside this Application. For more information, please check the privacy policies of the relevant services. Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

#### **Taboola (Taboola Inc.)**

Taboola is an advertising service provided by Taboola Inc.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#).

Storage duration:

- \*:session-data: indefinite
- COu: 1 month
- \_\_tbwt: indefinite
- \_data: 1 day
- \_tb\_sess\_r: 30 minutes
- \_tb\_t\_ppg: 30 minutes
- abLdr: 3 hours
- abMbl: 3 hours
- br: 30 minutes
- cnx\_roi: 1 month
- eng\_mt.crossSessionsData.SessionsHistory: indefinite
- eng\_mt.numOfTimesMetricsSent: indefinite
- eng\_mt.scrollDepth: indefinite
- eng\_mt.sessionDepth: indefinite
- eng\_mt.sessionStartTime: indefinite
- eng\_mt.timeOnSite: indefinite
- eng\_mt.ver: indefinite
- redirect\_data: 1 month
- rng: 1 day
- roi\_cookie: 1 month
- sessionid: 1 day
- t\_gid: 1 year
- taboola global:last-external-referrer: indefinite
- taboola global:local-storage-keys: indefinite
- taboola global:lspb: indefinite
- taboola global:tblci: indefinite
- taboola global:user-id: indefinite
- taboola\_fp\_td\_user\_id: 1 year
- taboola\_select: 1 year
- taboola\_session\_id: duration of the session
- tb\_click\_param: 50 seconds
- tbl-exm-apperance: indefinite
- tbl-exm-history: indefinite
- tbl-session-referrer: indefinite
- tbl\_rtus\_id: indefinite
- trc\_cache: indefinite
- trc\_cache\_by\_placement: indefinite
- trc\_cookie\_storage: 1 year

#### **Demandbase (Demandbase Ltd.)**

Demandbase is an advertising service provided by Demandbase Ltd.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt out](#).

Storage duration:

- tuuid: 2 years

- tuuid\_lu: 2 years

#### **Salesforce (Salesforce.com, Inc.)**

Salesforce is an advertising service provided by Salesforce.com, Inc.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#).

#### **Meta ads conversion tracking (Meta pixel) (Meta Platforms, Inc.)**

Meta ads conversion tracking (Meta pixel) is an analytics service provided by Meta Platforms, Inc. that connects data from the Meta Audience Network with actions performed on this Application. The Meta pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Meta Audience Network.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt out](#).

Storage duration:

- \_fbp: 3 months
- fr: 3 months

#### **NextRoll (NextRoll, Inc.)**

NextRoll is an advertising service provided by NextRoll, Inc. NextRoll, Inc. performs a hash of the User's email address in order to serve targeted advertising to other devices connected to them (i.e. cross-device tracking).

Personal Data processed: device information, purchase history, Trackers, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example) and Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#).

Storage duration:

- \_\_adroll: 14 hours
- \_\_adroll\_bounce\_closed: 5 years
- \_\_adroll\_bounced3: 5 years
- \_\_adroll\_consent\_data: indefinite
- \_\_adroll\_consent\_params: duration of the session
- \_\_adroll\_fpc: 2 years
- \_\_adroll\_load\_stats: 1 month
- \_\_adroll\_shared: 2 years
- \_\_adroll\_tcf\_banner\_seen: indefinite

#### **Demandbase conversion tracking (Demandbase Ltd.)**

Demandbase conversion tracking is an analytics service provided by Demandbase Ltd. that connects data from the Demandbase advertising network with actions performed on this Application.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – [Privacy Policy](#) – <https://www.demandbase.com/privacy-policy/#information-choices>.

#### **Managing contacts and sending messages**

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

#### **Marketo Email Marketing (Adobe Systems Incorporated)**

Marketo Email Marketing is an email address management and message sending service provided by Adobe Systems Incorporated

Personal Data processed: Trackers, Usage Data and various types of Data.

Place of processing: United States – [Privacy Policy](#).

### **Remarketing and behavioral targeting**

This type of service allows this Application and its partners to inform, optimize and serve advertising based on past use of this Application by the User.

This activity is facilitated by tracking Usage Data and by using Trackers to collect information which is then transferred to the partners that manage the remarketing and behavioral targeting activity.

Some services offer a remarketing option based on email address lists.

Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

#### **LinkedIn Website Retargeting (LinkedIn Corporation)**

LinkedIn Website Retargeting is a remarketing and behavioral targeting service provided by LinkedIn Corporation that connects the activity of this Application with the LinkedIn advertising network.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#).

Storage duration:

- AnalyticsSyncHistory: 1 month
- JSESSIONID: duration of the session
- UserMatchHistory: 1 month
- bcookie: 1 year
- bscookie: 1 year
- lang: duration of the session
- lidc: 1 day
- lissc: 1 year
- lms\_ads: 1 month
- lms\_analytics: 1 month

### **Activities that do not fit the above categorizations**

#### **Data Privacy Framework compliance**

SmartRecruiters comply with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce.

SmartRecruiters U.S. entities adhering to the DPF principles:

-SmartRecruiters, Inc.

SmartRecruiters has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) under the UK Extension to the EU-U.S. DPF.

SmartRecruiters has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

SmartRecruiters is responsible for the processing of personal data it receives, under the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and Swiss-U.S. DPF and subsequently transfers to a third party acting as an agent on its behalf. SmartRecruiters complies with the EU-U.S. DPF Principles and the Swiss-U.S. DPF Principles for all onward transfers of personal data from the EU, UK, and Switzerland, including the onward transfer liability provisions.

The Federal Trade Commission [OR U.S. Department of Transportation] has jurisdiction over SmartRecruiters's compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF. In certain situations, SmartRecruiters may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/s/participant-search>.

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, SmartRecruiters commits to refer unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF to TRUSTe, an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit <https://feedback-form.truste.com/watchdog/request> for more information or to file a complaint. These dispute resolution services are provided at no cost to you.

For complaints regarding EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and Swiss-U.S. DPF compliance not resolved by any of the other DPF mechanisms, you have the possibility, under certain conditions, to invoke binding arbitration. Further information can be found on the official DPF website: <https://www.dataprivacyframework.gov/s/article/ANNEX-I-introduction-dpf?tabset-35584=2>.

### **Data Privacy Framework SmartRecruiters adhesion**

SmartRecruiters, Inc. complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce.

SmartRecruiters, Inc. has certified to the U.S.

Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF.

SmartRecruiters, Inc. has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S.

Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF.

If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern.

To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>

### **SmartRecruiters is protecting your Privacy**

SmartRecruiters is committed to protect your privacy. Should we ask you to provide certain information by which you can be identified when using this website and our services, then you can be assured that it will only be used in accordance with this privacy policy.

### **How to manage preferences and provide or withdraw consent**

There are various ways to manage Tracker related preferences and to provide and withdraw consent, where relevant:

Users can manage preferences related to Trackers from directly within their own device settings, for example, by preventing the use or storage of Trackers.

Additionally, whenever the use of Trackers is based on consent, Users can provide or withdraw such consent by setting their preferences within the cookie notice or by updating such preferences accordingly via the relevant consent-preferences privacy widget, if available.

It is also possible, via relevant browser or device features, to delete previously stored Trackers, including those used to remember the User's initial consent preferences.

Other Trackers in the browser's local memory may be cleared by deleting the browsing history.

With regard to any third-party Trackers, Users can manage their preferences via the related opt-out link (where provided), by using the means indicated in the third party's privacy policy, or by contacting the third party.

### **Locating Tracker Settings**

Users can, for example, find information about how to manage Cookies in the most commonly used browsers at the following addresses:

- [Google Chrome](#)
- [Mozilla Firefox](#)
- [Apple Safari](#)
- [Microsoft Internet Explorer](#)
- [Microsoft Edge](#)
- [Brave](#)
- [Opera](#)

Users may also manage certain categories of Trackers used on mobile apps by opting out through relevant device settings such as the device advertising settings for mobile devices, or tracking settings in general (Users may open the device settings and look for the relevant setting).

### **How to opt out of interest-based advertising**

Notwithstanding the above, Users may follow the instructions provided by [YourOnlineChoices](#) (EU and UK), the [Network Advertising Initiative](#) (US) and the [Digital Advertising Alliance](#) (US), [DAAC](#) (Canada), [DDAI](#) (Japan) or other similar services. Such initiatives allow Users to select their tracking preferences for most of the advertising tools. The Owner thus recommends that Users make use of these resources in addition to the information provided in this document.

The Digital Advertising Alliance offers an application called [AppChoices](#) that helps Users to control interest-based advertising on mobile apps.

### **Consequences of denying the use of Trackers**

Users are free to decide whether or not to allow the use of Trackers. However, please note that Trackers help this Application to provide a better experience and advanced functionalities to Users (in line with the purposes outlined in this document). Therefore, if the User chooses to block the use of Trackers, the Owner may be unable to provide related features.

### **Owner and Data Controller**

SmartRecruiters, Inc.  
166 Geary St  
15th Floor Suite #1612  
San Francisco, CA 94108

**Owner contact email:** [dpo@smartrecruiters.com](mailto:dpo@smartrecruiters.com)

Since the use of third-party Trackers through this Application cannot be fully controlled by the Owner, any specific references to third-party Trackers are to be considered indicative. In order to obtain complete information, Users are kindly requested to consult the privacy policies of the respective third-party services listed in this document.

Given the objective complexity surrounding tracking technologies, Users are encouraged to contact the Owner should they wish to receive any further information on the use of such technologies by this Application.

### **Definitions and legal references**

#### **Personal Data (or Data)**

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

#### **Usage Data**

Information collected automatically through this Application (or third-party services employed in this Application), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

#### **User**



The individual using this Application who, unless otherwise specified, coincides with the Data Subject.

### **Data Subject**

The natural person to whom the Personal Data refers.

### **Data Processor (or Processor)**

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

### **Data Controller (or Owner)**

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Application. The Data Controller, unless otherwise specified, is the Owner of this Application.

### **This Application**

The means by which the Personal Data of the User is collected and processed.

### **Service**

The service provided by this Application as described in the relative terms (if available) and on this site/application.

### **European Union (or EU)**

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

### **Cookie**

Cookies are Trackers consisting of small sets of data stored in the User's browser.

### **Tracker**

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

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### **Legal information**

This privacy statement has been prepared based on provisions of multiple legislations.

This privacy policy relates solely to this Application, if not stated otherwise within this document.

Latest update: March 08, 2024