

Website Privacy Policy

INTRODUCTION

Welcome to our privacy notice.

We respect your privacy and are committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy here. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

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1. IMPORTANT INFORMATION AND WHO WE ARE PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how we collect and process your personal data through your use of this website. This policy also explains what type of services are provided through our online websites.

This website is not intended for children, and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

The Planet Group complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) as set forth by the U.S. Department of Commerce. The Planet Group 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 . If there is any conflict between the terms in this privacy policy and the EU-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/>. In compliance with the EU-U.S. DPF The Planet Group commits to cooperate and comply with the advice of the panel established by the EU data protection authorities (DPAs) with regard to unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF. As a participant in the DPF, The Planet Group is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

CONTROLLER

Planet Equity Group is made up of different legal entities, Planet Forward-UK, Planet Healthcare, Planet Technology, Planet Forward, Planet Professional, Planet Forward Energy Solutions, Strive Consulting, and 110 Holdings, LLC (DBA Launch Consulting) (referred to as the “Group”). This privacy notice is issued on behalf of all the companies in the Group so when we mention the Group, “we”, “us” or “our” in this privacy notice, we are referring to the relevant company in the Group responsible for processing your data. We will let you know which entity will be the controller for your data when we provide a service to you. Our Chief Technical Officer is the controller and responsible for this website.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise *your legal rights*, please contact the DPO using the details set out below.

CONTACT DETAILS

Full name of legal entity: Planet Equity Group, LLC

Name or title of DPO: Steven Jorgenson, Legal Operations Director Email address: Privacy@theplanetgroup.com

Postal address (US): 800 Hillgrove Ave, #201, Western Springs, IL 60558

Postal address (outside US): 10 Greycoat Place, London, SW1P 1SB

Telephone number (US): +1 708.286.1199

Telephone number (outside US): +44 203 868 1000

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on February 21, 2023 and historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, email address, IP addresses and account username.
- **Contact Data** includes email address and telephone numbers.
- **Work Data** includes CV/work history.
- **Technical Data** includes browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our website.
- **Characteristics of Protected Classifications Under California or Federal Law** includes gender and age.
- **Internet Or Other Electronic Network Activity Information** including pages visited on Company's websites and links clicked; IP address; location information; browser and device data; and language preferences.
- **Profile Information**, including results of self-assessment questionnaires and inferences drawn from the categories of Personal Information listed above to create a profile reflecting a California Consumer's preferences.

We only collect Identity, Contact and Work Data if you apply to a job on our websites, or submit your information to one of our representatives directly, or submit your information indirectly through another website or platform.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

IF YOU FAIL TO PROVIDE PERSONAL DATA

If you fail to provide that data when requested, we may not be able to provide the services to you. We will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Work Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply to use our services;
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

- **Third parties or publicly available sources.** We may receive personal data about you from various third parties as set out below:
 - Technical Data from the following parties:
 - (a) analytics providers such as Google based outside the EU;
 - (b) advertising networks such as Job Boards based inside the EU; and
 - (c) search information providers.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (providing job seeking service to you).
- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [Contact us](#) if you need details about the specific legal grounds we are relying on to process your personal data where more than one basis has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new candidate	(a) Identifiers (b) Non-Public Education Information Characteristics of Protected Classifications Under California or Federal Law Professional or Employment-Related Information (c) Commercial Information (d) Sensory Information (e) Internet or Other Electronic Network Activity Information	(a) Legitimate interest (to provide our services to you)

	(f) Profile Information	
To manage our relationship with you	(a) Identity (b) Contact (c) Work (d) Marketing and Communications	(a) Legitimate interest (to provide our services to you)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content to you	(a) Identity (b) Contact (c) Usage (d) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant to develop our business)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage	Necessary for our legitimate interests (to develop our products/services and grow our business)

SOURCES OF PERSONAL INFORMATION COLLECTED

In the last 12 months, Company collected the following categories of Personal Information about California Consumers from the following sources:

- **Directly From California Consumers:** (a) Identifiers; (b) Characteristics of Protected Classifications Under California or Federal Law; (c) Commercial Information; (d) Sensory Information; (e) Professional or Employment-Related Information; (f) Non-Public Education Information; (g) Profile Information.
- **Data Collection Technologies (described above):** Internet Or Other Electronic Network Activity Information.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookies Policy available on our website.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [Contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table above.

- Internal Third Parties as set out in the *Glossary*.
- External Third Parties as set out in the *Glossary*.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- Government agencies, law enforcement, public authorities, and other parties as required by law (including in litigation or to meet national security and law enforcement requirements).

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

We share your personal data with companies within the Planet Equity Group. This will involve transferring your data outside the European Economic Area (EEA), and outside of the United States from time to time for entities located inside the United States.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.

- We may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- We use Standard Contractual Clauses as a transfer mechanism between third parties.

Please [Contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

In compliance with the data privacy Principles, The Planet Group commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our data privacy policy should first contact The Planet Group at:

Please email Privacy@theplanetgroup.com

The Planet Group has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved data privacy framework complaints concerning Human Resources data and non-Human Resource data transferred from the EU.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are [available in our retention policy which you can request from us by [Contacting us](#).

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*

- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please [Contact us](#).

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object should we process your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify

whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Seek binding arbitration for certain claims as set forth in Annex I of the DPF Principles, provided that you have invoked binding arbitration by delivering notice to The Planet Group and following the procedures and subject to conditions set forth in Annex I of the Principles.

10. YOUR CALIFORNIA PRIVACY RIGHTS

Right to Know

California Consumers have the right to submit a verifiable request to know:

- The categories and specific pieces of Personal Information that Group has collected about them;
- The categories of sources from which Group collected the Personal Information;
- The categories of Personal Information that Group sold or disclosed to a third party (other than a service provider) for a business purpose and the categories of recipients of that information; and
- The business or commercial purposes for Group's collection, disclosure, or sale of the Personal Information.

Right to Delete

California Consumers have the right to submit a verifiable request for deletion of their Personal Information that Group has collected from the Consumer.

Request Update

California Consumers can also submit verifiable request updates to their Personal Information that Group has collected from the Consumer.

Right to opt out of the Sale of Personal Information

California Consumers have a right to opt-out of the sale of the Personal Information. However, as stated above, Company does not and will not sell Personal Information

How to Exercise Your Rights

Group will respond to requests in accordance with applicable law if it can verify the identity of the individual submitting the request and validate the request itself. California Consumers can exercise their rights in the following ways:

- Complete the "Online Request Form" to create a new Consumer Request.
- Contact by telephone: 708.286.1199 for assistance with the Online Request Form.

Requests by Authorized Agents

You may designate an authorized agent to exercise your right to know, your right to delete and request updates by submitting to us a completed "Authorized Agent Designation" form. You can obtain the designation form by writing to:

The Planet Group
Attn: Data Privacy Officer
800 Hillgrove Ave, #201
Western Springs, IL 60558

If an authorized agent submits a request on your behalf, the authorized agent must submit with the request either (a) a power of attorney that is valid under California law, or (b) a document signed by you that authorizes the authorized agent to submit the request on your behalf. In addition, we may ask you to follow the applicable process described above for verifying your identity.

How We Will Verify Your Requests

The processes that we follow to provide access and verify the identity of the person making a request to know, update or delete data about whom we have collected personal information are described below. All consumer requests require multiple verifications to confirm the identity of the person making any requests and to provide the requested accesses. All Consumer Requests require verification of a consumer's identity to confirm they are who they say they are and additional documentation if you are submitting requests on behalf of someone else.

Under the CCPA, a business is only required to respond to requests that are "Verifiable Consumer Requests." A verifiable consumer request is defined as a request that is made by a consumer, by a consumer on behalf of the consumer's minor child, or by a natural person or a person registered with the Secretary of State, authorized by the consumer to act on the consumer's behalf, and that the business can reasonably verify to be the consumer about whom the business has collected personal identifiable information.

All Consumer Requests for Personal Information:

- Consumer will need to provide one of the following to verify their personal identity: Scanned Driver License, Birth Certificate, Utility Bill or Passport when making a request for themselves.
- Consumer will additionally need to provide a scanned Power-Of-Attorney if the consumer request is on behalf of someone else for any reason.

All Consumer Update Requests To Personal Information also require:

- Consumer will additionally need to provide proof of the changes requested.

Your Right to Information About Disclosures of Personal Information for Direct Marketing Purposes:

Under California law, California Consumers can request information from us about whether we have disclosed Personal Information to any third parties for the third parties' direct marketing purposes. We will not sell your Personal Information to, or share it with, third-party companies for their direct marketing purposes without your consent. California Consumers desiring to request further information about our compliance with these laws or who have questions or concerns about our privacy practices and policies are welcome to contact us using the contact information below.

Minors Under 13 Years of Age

We respect the privacy of children. Our Services are not designed to attract an audience younger than thirteen (13), and we do not knowingly collect Personal Information from children under thirteen (13). If you are under the age of thirteen (13), you are not permitted to use our Services and should not send any information about yourself to us through the Services. Please contact us using the contact details below if you believe we may have collected information from your child under the age of thirteen (13), and we will work to delete it.

11. GLOSSARY

LEGITIMATE INTEREST means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [Contacting us](#).

PERFORMANCE OF CONTRACT means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

COMPLY WITH A LEGAL OR REGULATORY OBLIGATION means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

EXTERNAL THIRD PARTIES

Service Providers, including other companies we provide services to, providers of data collection technologies, providers of data analytics services, and website providers, or third-party advertising networks.

INTERNAL THIRD PARTIES

Other companies in the Group and who are based in the UK and US.

12. Additional Information

The Planet Group complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) as set forth by the U.S. Department of Commerce. The Planet Group 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 . If there is any conflict between the terms in this privacy policy and the EU-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/>. In compliance with the EU-U.S. DPF The Planet Group commits to cooperate and comply with the advice of the panel established by the EU data protection authorities (DPAs) with regard to unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF.

The Planet Group is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC). Under certain circumstances, you have the right to invoke binding arbitration to get relief under this Privacy Policy. The Planet Group remains liable and responsible for personal data in any cases where onward transfers occur.