## LIGHTCAST PRIVACY POLICY

#### 1. Introduction

This Privacy Policy (the "Policy") covers the processing of personal information by Obsidian BG Holdings LP and its group companies doing business under the Lightcast name ("we," "us," or "Lightcast"). Lightcast and all its group companies will have access to personal information covered by this Policy.

This Policy applies whether you provided personal information directly to us or we obtained it from a third party.

Additional information for residents of some states and countries can be found on our State Privacy Rights page.

### 2. What we collect

# Information you give us

We may collect and store personal information when you interact with us in the following ways:

<u>Marketing Information</u>. If you contact us about our services, download content from our websites, subscribe to alerts, or request a demo on our website, the forms you complete or the emails you send may include information about you. The categories of personal information we may collect include: your full name, contact information, and the organization with whom you are associated.

<u>Job Application Information</u>. When you apply for a job at Lightcast, we will ask you to provide us with personal information about yourself so we can evaluate your application. The categories of personal information we may collect include: your full name, contact information, employment history, educational history, financial information (such as salary, benefits, and tax information), and any other information you choose to share with us.

<u>User Information</u>. When you interact with our products and services, we may ask you to provide us with personal information to enable you to access our products and services. The categories of personal information we may collect include: your full name, contact information, password, and the organization with whom you are associated. We do not intentionally collect sensitive personal information.

## Information collected automatically online

<u>Website Analytics</u>. We collect information about your interactions with our website, including, for example: the type of device or browser you're using, your IP address, your browsing behavior while on our website, the websites you visited before or after visiting our site, and

your browsing behavior, such as which pages you viewed, which resources you downloaded, and which forms you filled out.

We use cookies, web beacons, and other mechanisms to analyze trends, administer the website, track users' movements around the website, and to gather demographic information about our user base as a whole. Users can control the use of cookies at the individual browser level or go to the <a href="Network Advertising Initiative Opt Out">Network Advertising Initiative Opt Out</a> to opt out of automated online marketing campaigns. Lightcast uses third-party web analytics services to track activity on Lightcast websites.

### Information from other sources

<u>Business Contact Information</u>. Additionally, we may receive personal information from third-parties, information you disclose publicly, or information you provide to us ("business contact information"). Lightcast collects current and historic business contact information. The categories of information collected about individuals may include: full name, demographic information, business and personal contact information, current and historical employment information, current and historical educational information, and information related to your social media profiles.

We may also collect general, aggregated, or statistical information about companies, industries, and salaries, and may associate this information with individual profiles. We do not intentionally collect sensitive personal information, such as financial, racial, ethnic, sexual orientation, or health information. If an individual discloses sensitive personal information in data we receive, we may inadvertently collect and store that information.

## 3. Why we collect information

We collect and process personal information directly from you or third parties for one of the following purposes: providing and improving our products and services, marketing, selling, or licensing our brand, products and services, evaluating candidates and hiring employees, and otherwise operating our business. We collect and process personal information based upon one or more of the following reasons:

### Consent

In some instances, Lightcast processes your information after obtaining your consent. Your consent may be obtained by third parties on Lightcast's behalf. You have the right to withdraw such consent at any time and we will cease to process data after consent is withdrawn.

## Legitimate Interest

Lightcast processes your personal data when it is in our or our clients' legitimate interest to do so and when these interests are not overridden by your rights. Our and our clients' legitimate interests include: having information about potential business customers, candidates, and labor market participants organized in one searchable database, and having access to current, complete, and insightful information; being able to identify individuals who work for a certain company, in a specific role, or have a certain estimated net worth, enabling customers to identify relevant contacts, generate and contact potential B2B leads, and aggregating statistical insights for the purpose of understanding patterns and trends.

## Legal Obligations

Lightcats may process your data to comply with our legal and regulatory obligations e.g. preventing, investigating and detecting crime, fraud, and prosecuting offenders, including working with law enforcement agencies. We may also be required to maintain personal information for a certain period of time by applicable laws, regulations, or our financial auditors.

# **Contractual Obligations**

Lightcast may process personal information where we have a contract with the individual or an organization who supplied the personal information for the purpose of receiving services. In such cases, we process the personal information to comply with our obligations under the contract.

## 4. How we use your information

### Website Analytics

We may use website analytics for the following purposes:

- to administer our sites and deliver a personalized experience for users, such as to serve secure pages to our users without asking them to sign in repeatedly;
- to ensure the proper functioning and improve the efficiency of our sites;
- to collect information regarding users' visits to our sites (including IP addresses) and the resources they access on the sites;
- to analyze user behavior and optimize the design and content of our sites.

# Marketing Information

We may use marketing information for the following purposes:

- to market our products and services to individuals, as an employee of an existing client or prospective client entity, including to provide promotional materials or offers for products and services from Lightcast;
- to send marketing-related communications to individuals who have requested them, or individuals in key roles at current or prospective clients who we believe may be interested in Lightcast's services;
- to market our products and services via email, postal mail, social media platforms, telephone, and text or direct messages.

# **Job Application Information**

We may use job application information for the following purposes:

- to identify and interview candidates for employment;
- to extend offers of employment and retain in employee files.

## **User Information**

We may use user information for the following purposes:

- to administer log-ins (where applicable) to Lightcat's products and services and deliver the services under the agreed terms of service;
- to respond to questions and provide support, including providing organizations with information about the services Lightcast offers;
- to send updates to our mailing list with information on news, offers, and updates about Lightcast products and services.

### **Business Contact Information**

We may use business contact information for the following purposes:

 to build our labor market intelligence database to enable our customers to analyze labor market data, individual labor market participants, and identify sales leads;

- to enable our clients or their customers to enrich their existing customer relationship management records and receive timely updates of changes;
- to undertake research and compile statistical aggregated reports based on data held in Lightcast's labor market intelligence database;
- to run our own marketing campaigns and promote our services.

## 5. Data Retention

We will hold your personal data for as long as is necessary for the relevant purpose. 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.

## 6. How we protect your information

We have implemented reasonable and customary administrative, technical, and physical security measures to help prevent unauthorized access to personal information. Despite these measures, no data transmission over the internet can be entirely secure, and we cannot guarantee or warrant the security of any information you transmit via our websites or apps.

You are responsible for maintaining the security of your credentials used to access any Lightcast service or account, and you must report suspected unauthorized activity to us.

We make reasonable efforts to restrict access to information to only those employees, contractors, and agents who need such access in order to operate, develop, improve, or deliver our programs, products, and services.

### 7. Sharing Personal Information

Third Party Service Providers

We may share your personal information with third parties who help us in the delivery of our products and services to you. We disclose information to companies and individuals we engage to perform functions on our behalf. Examples include hosting our web servers and analyzing data. We require third party vendors to maintain personal information as confidential information and to not share the information with any other party or use that data for any other purpose.

## Other third parties

We may share your personal information to other third parties including: 1) As necessary to comply with our legal obligations, including in order to respond to a lawful government request, court order, administrative or judicial process (such as a subpoena or search warrant); 2) As necessary to establish, exercise or defend our legal rights; 3) As necessary to protect your vital interests (for example, we may need to share your personal information with third parties in the event of an emergency); and 4) Where we have otherwise obtained your consent.

### 8. Miscellaneous

### **Protection of Children**

We do not knowingly collect personal information from or about anyone under the age of 16. If a parent or guardian becomes aware that his or her child has provided us with or we are in possession of their child's information without their consent, he or she should contact us at privacy@lightcast.io. We will delete such information from our files within a reasonable time.

## Data Subject Access Requests

Some jurisdictions provide certain rights regarding your personal information. A summary of each right and how you can exercise it is set out in the Jurisdiction Specific Page. To exercise any rights provided in your jurisdiction of residence (such as the right to access or deletion of your information), please complete the form <a href="here">here</a>. Such requests should include information to allow us to verify your identity (e.g., your name, address, email address or other information reasonably required).

Where we receive your request to exercise one of these rights, we will respond without undue delay and within the time required by applicable law. This may be extended in certain circumstances, e.g., where requests are complex or numerous. Due to the volume of requests we receive, we do not accept requests via email and will redirect you to the form linked above.

## Changes to this Policy

From time to time, we may change and/or update this Policy. If this Policy changes in any way, we will post an updated version on this website. We recommend you regularly review this website to ensure that you are always aware of our information practices and any changes to such. Any changes to this Policy will go into effect on posting to this page.

### How to Contact Us

If you have any questions or comments about this Policy, please contact us at:

Telephone: 617-468-4022

Email: <a href="mailto:privacy@lightcast.io">privacy@lightcast.io</a>

Last Updated: August 4, 2023