

One Dynamo Privacy Policy Version 1.0

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Purpose

The One Dynamo Companies, including Dynamo Technologies, LLC and Victory Solutions, LLC (hereinafter “**Dynamo**” or “**we**”) value the privacy of individuals who use our websites and related services (collectively, our “**Services**”). This Privacy Policy explains how we collect, use, and share the information of US residents who use our Services (“**Users**,” “**you**,” or “**your**”). By using our Services, you agree to the collection, use, disclosure, and processing of your information as described by this Privacy Policy. Beyond this Privacy Policy, your use of our Services is also subject to our <https://dynamo.works/terms-of-service> and any additional agreements you may enter into with us.

We collect Personal Data from US residents and comply with the consumer privacy laws of California, Colorado, Connecticut, Delaware, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Texas, Tennessee, Utah, and Virginia (“US Privacy Law”). For the purposes of this Privacy Policy, “Personal Data” means information that is linked or reasonably linkable to a particular individual or household. However, the following categories of information are not Personal Data:

- Publicly available information;
- Deidentified or aggregated data; or
- Information otherwise excluded from the scope of US Privacy Law.

This Privacy Policy provides the following information to US residents:

- Categories of Personal Data we collect;
- Purposes for which we use Personal Data;
- Categories of Personal Data we share with third parties;
- Categories of third parties with which we share Personal Data; and
- How US residents can exercise their rights under US Privacy Law.

1. Information We Collect

We may collect a variety of information about you or your devices from various sources. This section describes that information in general terms. You can find a more detailed category-by-category breakdown of the information we collect in the Categories of Non-Sensitive Personal Data and the Categories of Sensitive Personal Data sections below.

Registration Information. If you sign up for an account, register to use our Services, or sign up for emails or other updates, we may ask you for basic contact information, such as your Name, Email, Phone Number, and Mailing Address. We may also collect certain demographic information when you register for our Services, including your Age, Date of Birth, Place of Birth, Gender, Marital Status, Dependent Information, and Emergency Contact Details.

Communications. If you contact us directly, we may collect additional information from you. For example, when you reach out to our customer support team, we may ask for your name, email address, mailing address, phone number, or other contact information so that we can verify your identity and communicate with you. We may also store the contents of any message or attachments that you send to us, as well as any information you submit through any of our forms or questionnaires.

Events. If you register for an event that we host, whether in-person or online, we may collect relevant information like your name, phone number, and email address, as well as specific information relevant to the event for which you are registering.

Device Information. We may collect information about the devices and software you use to access our Services, such as your IP address, MAC address, web browser type, operating system version, device identifiers, or similar information.

Usage Information. To help us understand how you use our Services and to help us improve them, we may collect data about your interactions with our Services. This includes information such as crash reports, session lengths and times, the pages or other content you view, and any searches you conduct on our site.

Location Information. We may collect inferred location data (such as through IP address lookup) from your devices when you use our Services. We use this information to provide location-relevant Services and to detect and manage security risks.

Cookies and Similar Technologies. We and our third-party partners may collect information using cookies, pixel tags, or similar technologies. Cookies are small text files containing a string of alphanumeric characters. We may use both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits.

Information We Receive from Sources Other than You. We may receive information about you from other sources, including from third parties that help us update, expand, and analyze our records, identify new customers, or detect or prevent fraud. We may also receive information about you from social media platforms, such as when you interact with us on those platforms

or access our social media content. What information we receive from third parties is governed by the privacy settings, policies, and/or procedures of those third parties, and we encourage you to review them.

2. Categories of Non-Sensitive Personal Data We Collect

The tables below outline the non-sensitive categories of Personal Data Dynamo collects about US residents, what we use that data for, and whether and how it is shared with third parties.

We collect Non-Sensitive Personal Data:

- From our affiliates (“affiliates” are businesses that share common ownership with Dynamo)
- From our business partners (“business partners” are companies that we have a pre-existing commercial relationship with)
- From third-party sources, such as applicant tracking systems and benefit providers
- Automatically collected from or sent by the individual's device

Category: Identifiers	
Examples and Purpose for Collection	The Identifiers we collect may include your name, home address, email address, phone number, date of birth, place of birth, age, and gender. We collect this information to provide, maintain, and improve our Services, to communicate with you, to facilitate HR administration, and to detect and manage security risks.
Profiling	We do not use this information for profiling in furtherance of decisions that produce legal (or similarly significant) effects.
Targeted Advertising	We do not engage in targeted advertising or share this information for targeted advertising purposes
Sale	We do not sell this information to third parties
Other Disclosures	We do not otherwise share this information to third parties
Retention Period	For as long as reasonably necessary to provide, maintain, and improve our Services, facilitate HR administration, and detect and manage security risks, or as required by applicable law.

Category: Personal Characteristics	
Examples and Purpose for Collection	The Personal Characteristics we collect may include your marital status, dependent information, and emergency contact details. We collect this information for HR administration purposes, including payroll, recruitment, and staff administration.
Profiling	We do not use this information for profiling in furtherance of decisions that produce legal (or similarly significant) effects.
Targeted Advertising	We do not engage in targeted advertising or share this information for targeted advertising purposes
Sale	We do not sell this information to third parties
Other Disclosures	We may share this information with payroll and benefit providers and administrators to facilitate HR administration and the provision of employee benefits.
Retention Period	For as long as reasonably necessary to facilitate HR administration, including recruitment, or as required by applicable law.
Category: Professional Data	
Examples and Purpose for Collection	The Professional Data we collect may include your employment history, professional qualifications, and other information relevant to the recruitment and employment process. We collect this information for recruitment, staff administration, and payroll purposes.
Profiling	We do not use this information for profiling in furtherance of decisions that produce legal (or similarly significant) effects.
Targeted Advertising	We do not engage in targeted advertising or share this information for targeted advertising purposes
Sale	We do not sell this information to third parties
Other Disclosures	We may share this information with Affiliates and Business Partners. We share Professional Data with payroll and benefit providers and administrators to facilitate HR administration and the provision of employee benefits.
Retention Period	For as long as reasonably necessary to facilitate recruitment, staff administration, or as required by applicable law.

Category: Educational Data	
Examples and Purpose for Collection	The Educational Data we collect may include your educational history and qualifications. We collect this information for recruitment and staff administration purposes.
Profiling	We do not use this information for profiling in furtherance of decisions that produce legal (or similarly significant) effects.
Targeted Advertising	We do not engage in targeted advertising or share this information for targeted advertising purposes
Sale	We do not sell this information to third parties
Other Disclosures	We may share this information with Affiliates and Business Partners. We share Educational Data with payroll and benefit providers and administrators to facilitate recruitment and employee administration.
Retention Period	For as long as reasonably necessary to facilitate recruitment and staff administration, or as required by applicable law.

3. Categories of Sensitive Personal Data We Collect

The tables below outline the categories of Sensitive Personal Data Dynamo collects about US residents, what we use that data for, and whether and how it is shared with third parties. Dynamo obtains affirmative consent from US residents to process Sensitive Personal Data to the extent required by US Privacy Law. US residents that have given Dynamo consent to process their Sensitive Personal Data may withdraw that consent by sending an email to legal@dynamo.works with the subject line "Privacy Rights Request".

We collect Sensitive Personal Data:

- From our affiliates ("affiliates" are businesses that share common ownership with Dynamo)
- From our business partners ("business partners" are companies that we have a pre-existing commercial relationship with)
- From third-party sources, such as applicant tracking systems and benefit providers
- Automatically collected from or sent by the individual's device

Category: Communication Data	
Examples and Purpose for Collection	The Communication Data we collect may include the contents of messages, attachments, and other communications you send to us, as well as associated metadata such as message subject, date, time, sender, and recipient information. We collect this information to provide customer support, respond to inquiries, and detect and manage security risks.
Profiling	We do not use this information for profiling in furtherance of decisions that produce legal (or similarly significant) effects.
Targeted Advertising	We do not engage in targeted advertising or share this information for targeted advertising purposes
Sale	We do not sell this information to third parties
Other Disclosures	We may share this information with Affiliates and Business Partners. We share Communication Data as necessary to respond to inquiries and provide our Services.
Retention Period	For as long as reasonably necessary to provide support, respond to inquiries, and detect and manage security risks.
Category: Government ID Data	
Examples and Purpose for Collection	The Government ID Data we collect may include your passport number and Social Security number. We collect this information for payroll, staff administration, identity verification, and compliance with legal obligations.
Profiling	We do not use this information for profiling in furtherance of decisions that produce legal (or similarly significant) effects.
Targeted Advertising	We do not engage in targeted advertising or share this information for targeted advertising purposes
Sale	We do not sell this information to third parties

Other Disclosures	We may share this information with payroll and benefit providers and administrators as necessary to administer payroll and employee benefits.
Retention Period	For as long as reasonably necessary to administer payroll, verify identity, and comply with legal obligations. I-9 documentation is retained in accordance with USCIS retention requirements.

4. How We Use the Information We Collect

In addition to the purposes listed above, we may use the information we collect:

- To provide, maintain, improve, and enhance our Services;
- To understand and analyze how you use our Services and develop new products, services, features, and functionality;
- To host events;
- To communicate with you, provide you with updates and other information relating to our Services, provide information that you request, respond to comments and questions, and otherwise provide User support;
- For marketing and advertising purposes, including developing and providing promotional and advertising materials that may be relevant, valuable or otherwise of interest to you;
- To detect and prevent fraud, and respond to trust and safety issues that may arise;
- For compliance purposes, including enforcing our Terms of Service or other legal rights, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency; and
- For HR administration purposes, including payroll, recruitment, and staff administration;
- For other purposes for which we provide specific notice at the time the information is collected

5. How We Share the Information We Collect

We share Personal Data with the following categories of third parties:

Processors. We may share any information we collect with processors retained in connection with the provision of our Services. These companies are only permitted to use this information on our behalf and according to our instructions. Our processors are not permitted to use your information for their own purposes.

Our Affiliates. We may share your information with our affiliates, subsidiaries, and representatives as needed to provide our Services.

Our Business Partners. We may share relevant information about you with our business partners to provide you with exclusive offers for products and services that may interest you.

Our Payroll, Benefit, and Insurance Providers. We share Personal Data, including Government ID Data, Personal Characteristics, Professional Data, and Financial Data, with payroll providers, benefit administrators, and insurance providers to facilitate payroll processing, the administration of employee benefits, and the provision of health and welfare benefits.

Our Advertising and Analytics Partners. We use analytics services to collect and process certain analytics data, as detailed below. We also work with third-party services to conduct advertising via cookies. These third parties may also collect information about your use of other websites, apps, and online resources. These partners include:

- **Google** - We may use Google's services to collect and process analytics data about how our Users use our Services and to place ads that we think may interest our Users and potential users.
 - For more information, see [Google's Privacy & Terms](#) page.
- **Meta** - We may use Meta's services to place ads that we think may interest our users and potential users across Meta's various websites, such as Facebook and Instagram.
 - For more information, see Meta's [Data Policy](#) and [Privacy Center](#).
- **LinkedIn** - We use LinkedIn's services to place ads that we think may interest our users and potential users, as well as to advertise openings to potential employees.
 - For more information, see LinkedIn's [Privacy Policy](#) and [Cookie Policy](#).

- **Microsoft** - We use Microsoft's services to place ads that we think may interest our users and potential users.
 - For more information, see Microsoft's [Advertising Policies](#).

For more information about your choices regarding how our analytics partners use your information, see the Your Choices section below.

We may also share your Personal Data with other parties for the following reasons:

As Required by Law. We may share your information if we believe doing so is required or appropriate to: (a) comply with law enforcement requests and legal process, such as a court order or subpoena; (b) respond to your requests; or (c) protect your, our, or others' rights, property, or safety. In particular, we may share relevant information with the appropriate third parties if you post any illegal, threatening, or objectionable content on or through our Services.

Events. We may share your information with event partners or co-sponsors to facilitate the events for which you register.

Merger, Sale, or Other Asset Transfers. We may transfer your information to service providers, advisors, potential transactional partners, or other third parties in connection with the consideration, negotiation, or completion of a corporate transaction in which we are acquired by or merged with another company or in which we sell, liquidate, or transfer all or a portion of our assets. The use of your information following any of these events will be governed by the same general provisions of this Privacy Policy.

Consent. We may also share your information with your permission.

For more information on how we share the information we collect, see the Categories of Non-Sensitive and Sensitive Personal Data tables above. We do not sell Personal Data to anyone, and we do not share Personal Data for targeted advertising purposes.

6. Your Rights and Choices

6.1 Our Communications.

From time to time, you may receive marketing or other informational email messages from us. You can unsubscribe from our promotional and informational emails via the link provided in the emails. Users may continue to receive administrative messages necessary to service User accounts after opting out of receiving promotional messages from us.

6.2 Cookies.

Most web browsers allow you to manage cookies through the browser settings. To find out more about cookies, you can visit www.aboutcookies.org or www.allaboutcookies.org.

6.3 Our Partners.

You can learn more about Google's privacy practices and your options about how they use your information on Google's [website](#). You can also install the [Google Analytics Opt-out Browser Add-on](#). To inquire about your choices regarding our analytics or business partners generally, contact us at legal@dynamo.works.

6.4 Your Rights.

US residents have the following rights under US Privacy Law:

- The rights to access, correct, or delete Personal Data;
- The right to obtain a portable copy of Personal Data;
- The right to limit the use of Sensitive Personal Data in certain circumstances;
- The rights to opt out of targeted advertising, sales of personal data, or profiling;
- The right to obtain a list of the third parties that we disclose Personal Data to;
- The right not to receive discriminatory treatment for exercising your privacy rights; and
- The right to appeal our decisions about your requests if you disagree with them.

6.5 Exercising Your Rights.

If you are a US resident, you can submit a request to exercise your personal data rights by sending an email to legal@dynamo.works with the subject line "Privacy Rights Request". US residents that have given Dynamo consent to process their data in a specific way or to collect sensitive data about them may also withdraw their consent using this method.

Dynamo also processes opt-out requests sent by Universal Opt-Out Mechanisms (also referred to as "Opt-Out Preference Signals") frictionlessly in compliance with US Privacy Law. You can send an Opt-Out Preference Signal for our business to process frictionlessly by visiting our website using a device or browser that broadcasts commonly used and recognized Opt-Out

Preference Signals. We will apply the Opt-Out Preference Signals we receive to the browser or device that sent the signal. Please be aware that we do not accept or process rights requests submitted through other means.

To protect your privacy, we may need to authenticate your identity before we respond to your rights request. We will verify your identity by asking you to provide information that matches what we have on file at the time you submit your request. If you do not complete the verification process, we may be unable to process your request. Any information you provide to authenticate your identity will only be used to process your rights request and not for any other purpose.

We will respond to your rights request within 45 days (or within 15 days when required by US Privacy Law), and in certain cases we may inform you that we will need an additional 45 days to act on your request. If we suspect fraudulent or malicious activity on or from your account, we will delay acting on your request until we can appropriately verify your identity and the request as authentic. Also note that each of your rights are subject to certain exceptions that may permit or require us not to process your request.

We reserve the right to decline to process, or charge a reasonable fee for, requests from a US resident that are manifestly unfounded, excessive, or repetitive.

6.6 Authorized Agents.

You may designate an authorized agent to make a rights request on your behalf. Your authorized agent may submit such a request by using the method(s) described above. We may require verification of your authorized agent's authority in addition to the information we require for verification of your identity.

7. Notice of Right to Opt-Out of Sale/Sharing for Targeted Advertising

US Privacy Law gives US residents the right to direct a business that "sells" their Personal Data or shares it for targeted advertising purposes to stop selling and/or sharing their Personal Data at any time. As used here, "selling" means exchanging Personal Data with a third party for money or anything of value, and targeted advertising is the practice of displaying advertisements to a person that are selected based on that person's activities over time and across non-affiliated websites or applications. We do not currently sell Personal Data or share Personal Data for targeted advertising purposes. If our practices change in the future, we will update this Privacy Policy and provide you with the ability to opt out. You may contact us at legal@dynamo.works with the subject line "Privacy Rights Request" if you have questions about our data sharing practices.

8. Notice of Right to Limit the Use of Sensitive Personal Data

You have the right to limit some uses of Sensitive Personal Data. In general, you may direct companies not to use your Sensitive Personal Data except as necessary to provide goods or services you have requested or to further certain other exempt purposes.

However, we only use Sensitive Personal Data for purposes that are exempt from this right, such as to provide you with goods or services you have requested, to detect and prevent security incidents, or verifying the quality of our goods and services. The full list of these exempt purposes is specified in California Code of Regulations, Title 11, Section 7027(m).

9. Children's Data

We do not knowingly collect or use the Personal Data of children under 16. If you believe that we have collected the Personal Data of a child under 16, please contact us at legal@dynamo.works.

10. Third-Party Content

Our Services may contain links to other websites, products, or services that we do not own or operate. We are not responsible for the content provided by, or the privacy practices of, these third parties. Please be aware that this Privacy Policy does not apply to your activities on these third-party services or any information you disclose to these third parties. We encourage you to read their privacy policies before providing any information to them.

11. Security

We make reasonable efforts to protect your information by using administrative, technological, and physical safeguards designed to improve the security of the information we maintain and protect it from accidental loss, unauthorized access or use, or any other inappropriate or unlawful processing. Access to Personal Data is restricted to authorized administrators and users, and access requires passwords with multi-factor authentication (MFA). This includes complying with the terms of our internal privacy policies and procedures, which conform to the standards set out by the National Institute of Standards and Technology's (NIST) model privacy framework. We revise our policies and procedures periodically to ensure continued compliance with revisions to the NIST's framework.

However, because no information system can be 100% secure, we cannot guarantee the absolute security of your data.

12. International Visitors

Our Services are hosted in the United States and intended for visitors located within the United States. Personal Data may be transferred internationally through third-party service providers. If you choose to use the Services from the European Union or other regions of the world with laws governing data collection and use that may differ from U.S. law, then please note that you are

transferring your information outside of those regions to the United States for storage and processing. Also, we may transfer your data from the U.S. to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating the Services. By using our Services, you consent to the transfer, storage, and processing of your information as described in this Privacy Policy.

13. Changes to this Privacy Policy

We will post any adjustments to the Privacy Policy on this page, and the revised version will be effective when it is posted. If we make material changes, we will notify you of the change and give you the opportunity to withdraw your consent for future collection and/or processing of your data by posting a notification on the homepage of our website. We encourage you to read this Privacy Policy periodically to stay up to date about our privacy practices.

14. Contact Us

If you have any questions, comments, or concerns about our processing activities, please email us at legal@dynamo.works.