

## **WORKEY EMPLOYEES RECRUITMENTS LTD. (“GLOAT”)**

### **WEBSITE PRIVACY AND COOKIE POLICY**

March 13, 2019

This website is operated by Workey Employees Recruitments Ltd. (“Gloat”).

This Privacy Policy explains our privacy practices for processing Personal Data on our Website. We process your Personal Data when you visit and browse our Website, as described in this Policy.

We are committed to protecting your privacy and processing your Personal Data fairly and lawfully in compliance with applicable data protections laws. You can access our full Privacy Policy below to help you understand better how we collect and use your Personal Data. In it, we explain in more detail the types of Personal Data we collect, how we collect it, what is the legal basis of collection, what we may use it for, who we may share it with, what our retention periods are and what are your rights in relation to the Personal Data we collect.

Within the Privacy Policy you will find some specific examples of why and how we use your Personal Data.

Read this policy and make sure you fully understand our practices in relation to your Personal Data, before you access or use the Website. By browsing this Website, you consent to the processing of your Personal Data as detailed in this Privacy Policy. If you have read this Privacy Policy, and remain opposed to our practices, you must immediately leave this Website, and avoid or discontinue all use of the Website. If you have further questions or concerns regarding this policy please contact us at: [imob\\_privacy@gloat.com](mailto:imob_privacy@gloat.com).

**Important notice to Visitors interested in registering to and/or using our services:** We provide internal career opportunities services to our clients through our proprietary software platform. Please note that this policy applies only to Processing of Personal Data on our Website. Information regarding our privacy practices for Processing Personal Data within the provision of our services and the operation of our platform, is provided to users of the platform.

(All capitalized terms shall have the meanings as defined in the full Privacy Policy below).

### **FULL PRIVACY POLICY**

Workey Employees Recruitments Ltd. (“Gloat”, “we”, “our” or “us”) provides this Privacy Policy, as will be updated from time to time (our “Policy” or “Privacy Policy”) to inform the Visitors of our Website (or “you”) of our policies and procedures regarding the collection, use and disclosure of information we receive when you use the Website.

(All capitalized terms shall have the meanings as defined in the Definitions section below).

## 1. **Definitions:**

"**EEA**" shall mean the European Economic Area.

"**GDPR**" shall mean Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation), and as amended, replaced or superseded from time to time.

"**Applicable Laws**" shall mean the GDPR; European Union and Member State laws, rules and guidelines implementing or supplementing the GDPR, as amended from time to time and to the extent applicable to Gloat; and any other applicable privacy or other law to the extent applicable to Gloat.

"**Personal Data**" shall have the meaning ascribed to it in the GDPR. To put it simply, Personal Data means individually identifiable information, namely information that identifies an individual or may with reasonable efforts cause the identification of an individual.

"**Non Personal Data**" means information that does not personally identify you and does not reveal your specific identity as an individual, such as anonymized information.

The terms "**Controller**", "**Processor**", "**Processing**", "**European Commission**", "**International Organization**", "**Supervisory Authority**" and "**Personal Data Breach**" shall have the meanings ascribed to them in the GDPR.

"**Subprocessor**" shall mean any entity appointed by us or by one of our Processors/ Subprocessors, to Process Personal Data on our behalf or on behalf of that Processor/ Subprocessor; excluding any employee of Gloat or of Gloat' Processor/ Subprocessor or of any such appointed person but including any contractor or affiliate of the foregoing.

"**Visitor**" or "**you**" means visitors of our Website.

"**Website**" means our public website available at <https://www.innermobility.com> providing information regarding the services we provide to clients.

This Policy was originally written in English. If you are reading a translation and it conflicts with the English version, please note that the English version prevails.

## 2. **When Does This Privacy Policy Apply**

This Privacy Policy applies to Personal Data about you that we collect, use or otherwise process regarding your relationship with us as a Visitor of our Website.

This Privacy Policy does not apply to our other services that may have separate privacy policies that do not incorporate this Policy.

### 3. **The Types Of Personal Data That We Collect**

#### 3.1. **Personal Data That You Provide To Us**

Information provided through the “Contact Us” form: While browsing our Website, you may provide us Personal Data if you wish us to contact you and provide more information regarding our services, including: full name, email, company name and phone number (“**Contact Details**”).

#### 3.2. **The Personal Data That We Collect Or Generate**

- a) If you browse our Website, we may collect your Personal Data. This includes (by way of a non-exhaustive list): your computer’s Internet Protocol address and your Geo location, through the use of “cookies”.
- b) (For more information on our cookies and other means of tracking, please see Section 11 “**Cookies**” below).

### 4. **The Types Of Non Personal Data That We Collect Or Generate**

4.1. In addition to the categories of Personal Data described above, we will also process further anonymized information and data that is not processed by reference to a specific individual. We may collect this Non-Personal Data through the Website in the following ways:

- a) Information that your browser sends (“**Log Data**”). This Log Data may include, but is not limited to, non-identifying information regarding your device, User ID, operating system, internet browser type, screen resolution, language and keyboard settings, internet service provider, the web page you were visiting and information you search, etc.
- b) We may use automated devices and applications to analyze the usage of our Website. We use these tools to help us improve our Website, performance and user experience. For more information, please see Section 11 “**Cookies and Analytics Tools**” below.

### 5. **How We Use Personal Data (Purposes Of Processing)**

5.1. Personal Data is used for the following primary purposes (as may be updated from time to time):

- a) to provide and operate the Website;
- b) to monitor, study and analyze the use and functionality of the Website;
- c) to provide on-going customer assistance, technical support and maintain the Website;

- d) to provide service announcements and notices, promotional messages and market the our services (subject to your consent when required);
- e) to enforce our Terms and Conditions, policies and other contractual arrangements and prevent misuse of the Website; and to comply with court orders and warrants and to take any action in any legal dispute and proceeding;
- f) to better understand your needs, both on an aggregated and individualized basis, in order to further develop, customize and improve our Website based on Visitors' preferences, experiences and difficulties;
- g) to communicate with you and contact you to obtain feedback from you regarding the Website;
- h) to disclose to third party vendors, service providers, contractors or agents who perform functions on our behalf with respect to the Website;
- i) to create aggregated statistical data and other aggregated and/or inferred Non-Personal Data, which we or our business partners may use to provide and improve our Website; and
- j) as otherwise authorized by you.

5.2. We may use your email address you provided us to contact you when necessary, including in order to send you notifications and reminders related to our services as well as promotional materials (subject to your consent if required). At any time, you may choose (opt out) whether your Personal Data is to be used for sending such marketing materials which are not an essential part of the usage of the Website. You may exercise your choice by contacting us at [imob\\_privacy@gloat.com](mailto:imob_privacy@gloat.com).

## 6. **How We Use Non Personal Data (Purposes Of Processing)**

6.1. We may use information that is Non Personal Data for the same purposes we use Personal Data (where applicable) and in addition in order to:

- a) compile anonymous or aggregate information,
- b) disclose to third party vendors, service providers, contractors or agents who perform tasks on our behalf in connection with the Website,
- c) monitor and analyze use of the Website and for the technical administration and troubleshooting of the use of the Website, and
- d) provide us with statistical data.

6.2. We may use analytics tools to help us understand Visitors' behaviour on our Website, including by tracking page content, and click/touch, movements, scrolls and keystroke activities. The privacy practices of these tools are subject to their own policies and they may use their own cookies to provide their services. Further information about your option to opt-out of these analytics tools is available at: [imob\\_privacy@gloat.com](mailto:imob_privacy@gloat.com).

- 6.3. From time to time, we may use additional or alternative analytics services. We will provide a notice of these changes on our Website.
- 6.4. We use anonymous, statistical or aggregated information, which may be based on extracts of your Personal Data, for legitimate business purposes including for testing, development, improvement, control and operation of the Website. We may share such information with our third party providers. It has no effect on your privacy, because there is no reasonable way to extract data from the aggregated information that can be associated with you. We will share your Personal Data only subject to the terms of this Policy, or subject to your prior informed consent, if required.

## 7. **The Legal Basis For Use Of Personal Data**

- 7.1. We will only process your Personal Data where we have a legal basis to do so. The legal basis will depend on the reason or reasons we collected and need to use your Personal Data. In almost all cases the legal basis will be:
  - a) To provide the content of the Website to Visitors.
  - b) To fulfill a legitimate interest that we have as a business.
  - c) Because you consented to us using the Personal Data for a particular purpose.
- 7.2. More information on the basis of processing:
  - a) Processing the Personal Data is required for taking steps at your request before entering into an agreement, for example: if you provide your details under “Contact Us” form, in order to inquire about our services, we will contact you and provide you the requested information.
  - b) Processing the Personal Data is required for fulfilling our or a third party’s legitimate interests, for example: (1) we collect information about use of our Website in order to identify and prevent its abuse; (2) we use Personal Data to maintain and improve our Website by identifying Visitor trends and technical issues.
  - c) You consent to the processing of Personal Data for one or more specific purposes, for example, to the extent that you consent, we will send you information about our services.
- 7.3. It is hereby clarified that the legal bases detailed above are the legal bases for actions to process Personal Data, carried out by us in accordance with the GDPR. If processing of Personal Data is subject to other Applicable Laws, then the legal basis for processing Personal Data may differ according to those Applicable Laws.

For more information, see Section 10 “**Your Rights**” below.

## 8. **Sharing Information With Others**

- 8.1. We do not sell, rent or lease your Personal Data. We may share your Personal Data with service providers and other third parties, if necessary to fulfil the purposes for collecting and Processing the information, such as cloud vendors, subcontractors providing us Processing services, etc. provided that any such third party will commit to protect your privacy as required under the Applicable Laws and this Policy, in accordance with that third party's obligations as Controller, Processor or Subprocessor of the information we share with it.
- 8.2. Additionally, a merger, acquisition or any other structural change may require us to transfer your Personal Data to another entity, provided that the receiving entity will comply with this Policy.
- 8.3. We may need to disclose Personal Data in response to lawful requests by public authorities or law enforcement officials, including meeting national security or law enforcement requirements. We cooperate with government and law enforcement officials to enforce and comply with the law.

## 9. **Transfer Of Data Outside Your Territory**

- 9.1. We may store, process or maintain information in various sites worldwide, including through cloud based service providers worldwide. If you are a Data Subject in the EU, and we envisage transferring your Personal Data to a third country outside the EEA or to an International Organization, we will ensure that it is protected and transferred in a manner consistent with Applicable Laws, in one of the following ways:
  - a) To a country that is approved by the European Commission as offering an adequate level of protection for Personal Data;
  - b) To a recipient which has signed with us relevant "model contractual clauses" approved by the European Commission, obligating it to protect your Personal Data;
  - c) where the recipient is located in the US, it might be a certified member of the EU-US Privacy Shield scheme; or
  - d) in other circumstances the Applicable Laws may permit us to otherwise transfer your Personal Data outside the EEA.
- 9.2. You can obtain more details of the protection given to your Personal Data when it is transferred outside the EEA (including a copy of the standard data protection clauses which we have entered into with recipients of your Personal Data) by contacting us as at [imob\\_privacy@gloat.com](mailto:imob_privacy@gloat.com).
- 9.3. If you are located in a jurisdiction where transfer of your Personal Data to another jurisdiction requires your consent, then you provide us your express and unambiguous consent to such transfer or the storage, processing or maintenance of the information in other jurisdictions by using the Website.

## 10. Your Rights

- 10.1. In all of the above cases in which we collect, use or store your Personal Data, you may have the following rights and, in most cases, you can exercise them free of charge. At any time, you may contact us at: [imob\\_privacy@gloat.com](mailto:imob_privacy@gloat.com) and request to know what Personal Data we keep about you. We will make good-faith efforts to locate the data that you request to access. Where we are a Processor, we shall comply with your request only subject to the written instructions of the Controller of your Personal Data.
- 10.2. When you ask us to exercise any of your rights under this Policy and the applicable law, we may need to ask you to provide us certain credentials to make sure that you are who you claim you are, to avoid disclosure to you of Personal Data related to others and to ask you questions to better understand the nature and scope of data that you request to access.
- 10.3. We may redact from the data which we will make available to you, any Personal Data related to others. In addition, we may delete information if required by Applicable Laws.

### **Note to our Data Subjects in the EU:**

We hereby inform Visitors from the EU (in this section “**You**”, “**Your**”), of the following rights (by virtue of the GDPR) with respect to the Processing of your Personal Data:

- Right to rectification: if the Personal Data Processed by Gloat is incorrect, incomplete or not Processed in compliance with Applicable Law or this Privacy and Cookie Policy, You may have the right to have your Personal Data rectified.
- Right to erasure: under certain conditions, You may be entitled to require that Gloat will delete or "block" your Personal Data (e.g. if the continued Processing of a specific data is not justified or if the lawful basis for Processing is consent).
- Right to Portability: under certain conditions, You may have the right to transfer the Personal Data that you have provided to us between data Controllers (i.e. to ask us to transfer your Personal Data to another entity).
- Right to object: where that lawful basis for Processing Your Personal Data is either "public interest" or "legitimate interests", those lawful bases are not absolute, and You may have a right to object to such Processing.
- Right to withdraw consent: If the Processing of your Personal Data is based on Your consent, You have the right to withdraw Your consent to such processing at any time. You may contact us at [imob\\_privacy@gloat.com](mailto:imob_privacy@gloat.com).
- The right to restrict Processing – under certain circumstances, You may have the right to object to the Processing of your Personal Data due to your particular situation.
- Right to lodge a complaint: You have the right to lodge a complaint before the relevant data protection authority or Supervisory Authority of Your jurisdiction.

If you are a Data Subject in another jurisdiction - other rights may apply and not all of the rights mentioned above may be applicable to you.

**To exercise these rights, where applicable, please contact us as detailed in Section 17 “Contact Us” of this Policy.**

## 11. **Cookies and Analytics Tools**

A cookie is a small data file that we transfer to your computer’s hard disk for record-keeping purposes.

11.1. A cookie is a small data file that we transfer to your computer’s hard disk for record-keeping purposes. When you access or use our Website, Gloat uses industry-standard technologies such as “cookies”, other tracking technologies and other local files, which store certain information on the browser or hard drive of your computer and/or your mobile telephone device (“**Local Storage**”) and which will allow us to distinguish you from other users, track your click-stream to assess performance of the Website, gather information about your approximate geo-location, store your preferences, enable automatic activation of certain features and improve Your user experience and other capabilities.

11.2. Most devices and browsers will allow you to erase cookies from your device’s hard drive, block acceptance of cookies, or receive a warning before a cookie is stored. Please note that unless you block the acceptance of cookies, the Website will utilize cookies upon your use of the Website (all unless it is required by Applicable Laws to provide a separate consent to use such cookies, and in which case We will use such cookies only after we receive your separate consent to such use and subject to your right to withdraw such consent at any time).

11.3. We may also engage third parties to track and analyze data or provide other services on our behalf. Such third parties may combine the information that we provide about you with other information that they have collected from other sources. This Policy does not cover such third parties’ use of the data and such use is governed by such third parties’ privacy policies.

11.4. We use Google Analytics, and their privacy policy can be accessed by this link: <https://policies.google.com/privacy?hl=en>.

## 12. **Data Security**

12.1. We take the safeguarding of the Personal and Non Personal Data very seriously, and use a variety of industry standard systems, applications and procedures to protect the information from loss, theft, damage or unauthorized use or access. However, although we make efforts to protect your privacy, we cannot guarantee that the Website will be immune from any wrongdoings, malfunctions, unlawful interceptions or access, or other kinds of abuse and misuse.

12.2. We also regularly monitor our systems for possible vulnerabilities and attacks, and regularly seek new ways and for further enhancing the security of our Website and protection of our Visitors’ privacy.

- 12.3. You should take steps to protect against unauthorized access to your password, phone, and computer by, among other things, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, and keeping your log-in and password private. In addition, you should take steps to protect against unauthorized access to Personal Data stored on your premises as well as defining limited access rights to such information on a need to know basis.
- 12.4. If you receive an e-mail asking you to update your information with respect to the Website, do not reply and please contact us at [imob\\_privacy@gloat.com](mailto:imob_privacy@gloat.com).

### **13. Data Retention**

- 13.1. We retain different types of information for different periods, depending on the purposes for processing the data. We may retain Personal Data for as long as necessary in order to support our legitimate business purposes, for example, for storing data, for documentation, for cyber-security management purposes, legal proceedings and tax issues.
- 13.2. We may store aggregated Non Personal Data without time limit. In any case, as long as you use the Website, we will keep information about you, unless we are legally required to delete it, or if you exercise your rights to delete the information.

### **14. Our Policy Toward Children**

Our Website is not meant to be used by or for persons under 18, as such, we do not knowingly collect Personal Data from minors younger than 18. Insofar as Personal Data may be collected based on your consent, the data subject must be above the age of 16 (or above the age of 13 if this is the legal requirement in your country). If these age requirements are not met, you are required to obtain the consent of the parent or guardian to provide and process information in accordance with this Policy; lacking such consent, please do not use the Website.

### **15. Changes To This Privacy Policy**

- 15.1. We may change the terms of this Privacy Policy from time to time by posting notice on our Website, with a seven (7) day advance notice. However, substantial changes will be effective thirty (30) days after the notice was initially posted. We will make an effort to inform you of substantial changes through the channels of communication generally used in such circumstances.
- 15.2. If we need to adapt the Policy to legal requirements, the amended Policy will become effective immediately or as required.
- 15.3. Your continued use of the Website following such notice shall constitute your consent to any changes made and a waiver of any claim or demand in relation to such changes. If you do not agree to the new or different terms, you should not use and are free to discontinue using the Website.

### **16. Applicable Law And Dispute Resolution**

16.1. This Privacy Policy shall be governed by and construed in accordance with the laws of the State of Israel, without regard to its conflict of law provisions.

16.2. The courts of the Tel Aviv – Jaffa district shall have exclusive jurisdiction in all disputes and proceedings arising from this Privacy Policy.

17. **Contact Us**

For further information about this Policy, please contact us at [imob\\_privacy@gloat.com](mailto:imob_privacy@gloat.com).

If you have any concerns relating to this Policy, please contact us and we will make good-faith efforts to address your concerns. We are usually able to resolve privacy questions or concerns promptly and effectively. If you are not satisfied with the response you receive from us, you may escalate concerns to the applicable privacy regulator in your jurisdiction. Upon request, we will provide you with the contact information for that regulator.

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