



RECRUITMENT PRIVACY NOTICE

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How Do We Change this notice?	From time to time, we will need to update this Notice. If the updates have minor or no consequences, they will take effect 7 days after we post the revised notice. Please contact HR team for further information. Read More
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About of this Notice

Last Updated: 19 June 2023

We at Idomoo (“we”, “us”, and “our”) put great efforts in making sure that we secure Personal Information related to you and use it properly. This notice (this “**Notice**”) explains our privacy practices and how we handle Personal Information related to you as a job applicant when you apply for a job with us. Specifically, this Notice will provide details about:

- the Personal Information that you submit us as a job applicant;
- what we do with Personal Information and how we Process, retain and share it; and,
- the rights that you may have in connection with Personal Information.

“**Personal Information**” means information related to you which identifies or that can identify you.

“**Processing**” means any operation performed by us on Personal Information.

Please take the time to read this Notice, and do not hesitate to contact our HR team at: career@idomoo.com should you have any questions regarding your privacy rights or this Notice.

The general terms of this Notice apply to all job applicants, whereas specific provisions – ‘Specific Provisions Under US Privacy Laws’; and ‘Specific Provisions Under EU Data Protection Laws’ – will apply and supersede the general terms of this Notice for job applicants to whom these provisions apply.

What Personal Information Do We Collect and Use?

When you apply for a job with us, we will ask you to provide certain Personal Information that will help us evaluate your qualifications and candidacy and to stay in touch with you during the application and recruitment process. We record, collect, store, and analyze Personal Information, including:

- Personal Information connected to your identity, such as: first name, surname, title, date of birth, place of birth;
- Contact information, such as: address (street, zip code, country), phone number, email address;
- Personal Information related to eligibility, such as: salary, benefits, tax and pension-related information, performance-related data, recruitment history and background checks;
- Eligibility information, such as: resume/CV, cover letter, employment history (employers, job titles, length of employment) and educational background and training, linguistic capabilities, job skills, personal interests;
- Verification and background information and documents such as: diplomas, certificates, national IDs, driver’s license, passport, social security, birth certificate;
- Reference materials and documents such as: job references and letters of recommendation, job salary/payment history, military records, titles and licenses, immigration visa status, security clearance, background checks including criminal history (where permitted by law);



- Social media information such as your LinkedIn profile;
- When you visit our 'Careers' online webpages, or view job positions, or click on the 'Apply' button for specific positions, we and our third party service providers collect information such as the IP address of your device (which provides your device's location), and other non-identifiable information that is used for analytical purposes, such as the type of browser, browser language, type of operating system, domain name of Internet service provider, web pages visited, times and dates of visits and the content you access on and/or through the Site.
- Any data, content, or communications transmitted to or from, received or printed from, or created, stored or recorded on any of the above, including for personal use.

How Do We Collect Personal Information?

We collect Personal Information in one or more of the following ways:

- Through the application and recruitment process, either directly from you when you apply for a job, or from recruitment service providers or consultants if such were involved.
- From third parties including former employers, or other information providers, and, subject to applicable laws, through background checks.
- If you use our online application system to apply for a job, our HR platform service provider will collect personal information related to you on our behalf. Personio is our third-party service provider that handles our job recruitment process (see further information in the Sharing Personal Information section below). We may decide to change our job recruitment service provider.

Why We Collect and Use Personal Information?

We collect and use Personal Information primarily to manage our recruitment process (the "**Purposes**"), including:

- To process your application;
- to comply with equal opportunity, diversity, inclusion and other legal requirements and to protect our legal rights;
- to combine Personal Information related to you with background checks' information that we receive from third party service providers;
- to manage, maintain and document recruitment and other HR-related activities and personnel generally, for example, to conduct data analytics studies to review and understand better personnel retention and attrition rates;
- to manage business operations and governance, for example: auditing, HR development and handling fraud and other violations of the law;
- to comply with legal and other mandatory requirements, including to obey orders and subpoenas, and to comply with supervision and enforcement actions;
- to support any corporate structure change, including mergers, acquisition and other corporate transactions;
- to monitor your use of any information and communication systems that we make available to you during your recruitment process and for cyber security purposes; and,
- when we believe in good-faith that using Personal Information is necessary to protect the life, health, safety or other vital interest of ours, our personnel, and any other person.



How Long Do We Retain Personal Information?

If your application for employment is unsuccessful, we will hold your data on file for up to 5 years after you have provided your consent to this policy, unless required otherwise under applicable laws. At the end of that period, your data is deleted or destroyed.

If your application for employment is successful, personal information gathered during the recruitment process will be transferred to your personnel file and retained during your employment subject to our then in effect employees' privacy policy.

However, we will maintain a record with details about your submission of the application with us, such as your name, interview dates and locations, our decision whether to hire you or not and other relevant information to establish exercise and defend legal claims, for internal review, oversight and operation of our HR efforts and if we are required under law to retain Personal Information related to you.

Retention periods can vary based on how long the recruitment process lasts and the time period between when you first apply and when a hiring decision is made in connection with your application.

You can let us know that you would like us to save personal information related to you for a longer period, to take into account for future job postings.

Who Has Access to Personal Information?

We will share Personal Information internally, including with members of our HR and Finance departments, your potential direct manager, senior management and our IT staff if access to the Personal Information is necessary for the performance of their roles.

Who Do We Share Personal Information With?

We will share Personal Information in the following instances:

- With our third-party service providers, such as the job recruitment service provider that handle our job recruiting, hiring, and on-boarding process, or with any additional service provides which help us with the recruiting process.
- With third party service providers that provide legitimate business functions for us, which will include processing Personal Information. Such third-party service providers are engaged by us for the provision of, among others, data storage, information security and employee background checks.
- With a competent supervisory authority, if we believe doing so is in accordance with, or is otherwise required by applicable law, regulation, judicial or legal process.
- With law enforcement or other authorities (including immigration, health, tax, national security) when it is necessary to protect the interests of our company or individuals.
- With another entity when it is required as part of a merger, acquisition or assignment of part or all of our business with that entity, or any other change of corporate structure.

We do not sell, rent lease or otherwise commercialize Personal Information.

What Are Your Obligations?

It is important that Personal Information that we hold about you during the recruitment process is accurate and current. Please keep us informed if Personal Information related to you changes.

What Are Your Choices and Rights?



We respect our job applicants' rights. Applying for a job and submitting your job candidacy materials is voluntary, and at any time if you would like to withdraw your job candidacy, you can contact us and request that we stop considering your application.

You may request to access, correct, delete, or to obtain a copy of Personal Information related to you and, depending on applicable law, you may have additional rights available to you.

If you request to correct or delete Personal Information related to you, please note that we may still need to retain certain information for record-keeping purposes or to comply with our legal or contractual requirements.

To exercise any of the abovementioned rights, please contact our HR team at: career@idomoo.com. Upon your request, and based on the rights afforded to you under applicable law, we will respond to your request promptly.

How Do We Secure Personal Information?

We have implemented administrative, technical, and organizational security measures, as well as policies and procedures, to protect Personal Information. These measures and procedures are designed to protect Personal Information against risks, such as temporary or permanent loss, destruction, and unauthorized or unlawful access, alteration, use or disclosure.

We require our suppliers and vendors to apply similar security measures and procedures when they access or use Personal Information that they process on our behalf.

International Data Transfer

We transfer Personal Information between various sites located in Israel, the EEA, the U.S., and additional territories to operate our business efficiently, to improve performance, and to create redundancies in order to protect information in the event of an outage or other malfunctions.

Whenever we transfer Personal Information beyond the country of origin, we will do so in accordance with applicable law.

If you are a resident in a jurisdiction where transfer of Personal Information to another jurisdiction requires your consent, then you hereby provide us your consent to such transfer of Personal Information.

You can contact our HR team at: career@idomoo.com for further information about data transfers.

Specific Provisions Under US Privacy Laws

In this chapter, we will refer to Personal Information as such term is defined under U.S. privacy laws.

These provisions apply solely if US privacy law applies to the Processing of Personal Information related to you by us.

In the preceding twelve (12) months, we have not sold Personal Information, and have collected the following categories of Personal Information:

- The identifiers and Personal Information categories detailed in the "What Personal Information Do We Collect and Use?" provision in this Notice.
- Characteristics of protected classification under applicable law, such as gender identity and health-related information.
- Biometric information, such as your behavioral characteristics, photos and voice records.
- Non-precise Geolocation data (i.e., IP address).



- Professional or employment-related information and educational information, as described in the “What Personal Information Do We Collect and Use?” provision in this Notice.
- Inferences drawn from the collected Personal Information listed above.

We obtain the categories of Personal Information listed above from the following categories of sources:

- Directly from you as part of the application and recruitment process.
- Indirectly from you, as part of our service providers’ services and other third parties.

We use the Personal Information that we collect or receive for our business purposes, as described under the “Why We Collect and Use Personal Information?” provision in this Notice.

We disclose Personal Information to third parties for our business purposes as described under the “Who Do We Share Personal Information With?” provision in this Notice. In the preceding twelve (12) months, we have disclosed identifiers with service providers who assist us with completing certain background checks (including criminal history) and employment eligibility verification processes; and Personal Information related to employment relationship with performance management service providers.

Exercising Your Rights

Please refer to the “What Are Your Choices and Rights?” section of this Notice for information on how you may exercise your rights under US privacy law.

Only you or a person authorized to act on your behalf, may make a request concerning Personal Information that we retain about you. You may also make a verifiable consumer request on behalf of a minor under your charge.

A request for access can be made by you only twice within a 12-months period.

We cannot respond to your request or provide you with the requested Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information. We will only use the Personal Information provided in your request to verify your identity or authority to make the request.

We will do our best to respond to your request within 45 days of its receipt. If we require more time (up to additional 45 days), we will inform you of the reason and extension period in writing. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures that we provide will only cover the 12-month period preceding receipt of your request. The response we provide will also explain the reasons for our inability to comply with your request, if applicable.

We do not charge a fee to process or respond to your request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will inform you of the reasons for such decision and provide you with a cost estimate before processing further your request.

You will not receive discriminatory treatment and you will not be retaliated against for exercising your rights.

We use and disclose sensitive Personal Information about you only where such use and disclosure are reasonably necessary and proportionate for our purposes. We do not use or disclose such sensitive Personal Information for the purpose of inferring characteristics about you.

Specific Provisions Under EU Data Protection Laws

In this chapter, when we refer to “**Personal Data**” we mean any information relating to you as an identified or identifiable natural person.



These provisions apply solely if EU data protection law applies to the Processing of Personal Data related to you by us.

Whose Personal Data do we Process? We are a “data controller” in relation to Staff Personal Data Processed in accordance with this Notice (except where this Notice explains otherwise). This means that we are responsible for deciding how we hold and use Personal Data about you.

Name and Contact Details

Data Controller’s Details: Idomoo UK Ltd. – privacy@idomoo.com

Our Data Protection Officer may be reached at: privacy@idomoo.com

Our EU Representative is: IITR Cert GmbH, available at: skraska@iitr.de

Our EU Representative is: Idomoo UK Ltd., available at: dotan.ginsbourg@idomoo.com

We may process Personal Data Relating to you if:

- you are a current, former or prospective employee, partner, worker, intern, agency worker, consultant, director or contractor of ours (“**Staff**”); or
- We may also Process Personal Data in relation to dependents or other family members of the above people, in the circumstances set out in provision “Why We Collect and Use Personal Information?”.

What personal data do we process? We Process the Personal Data categories listed under the “What Personal Information Do We Collect and Use?” section of this Notice.

The Processing is based on the following lawful grounds:

- All Processing of Personal Data that is not based on the lawful grounds indicated below is based on your consent. The purposes of Processing are detailed under provision “Why We Collect and Use Personal Information?”.
- We Process your job application related data to perform the contract with you.
- We will also Process Personal Data to comply with our obligations under applicable law and to protect your and others’ vital interests.
- We will further rely on our legitimate interests, which we believe are not overridden by your fundamental rights and freedoms, for the following purposes: **(1)** our general HR management purposes; and **(2)** cyber security.

How do we collect data about you? We will normally collect Personal Data directly from you. In appropriate circumstances, we may collect data from third parties in connection with background checks in connection with your engagement as a job applicant. We will collect appropriate information from you in connection with your job-related activities. For more information, please see provision “How Do We Collect Personal Information?”.

How long do we retain Personal Data? We retain Personal Data for the period for which the Personal Data will be stored and the criteria used to determine that period are detailed provision “How Long Do We Retain Personal Information?”.

Who within our company has access to your data? Access to Personal Data within our company is restricted to those who need to obtain access to it for the purposes outlined above, and generally they will only have access to that part of the data relating to you that is relevant to the particular purpose concerned. For more information, please see the provision titled “Who Has Access to Personal Information?”.



Access to your data by other group companies and third parties:

- We may disclose certain Personal Data internally in appropriate circumstances and only for purposes permitted by applicable law, as set out in more detail in provision “Who Has Access to Personal Information?”.
- We may disclose certain Personal Data to our auditors and other professional advisors or consultants providing services to us that require such disclosure.
- We may also disclose certain Personal Data to other third party service providers who may perform functions for us, as set out in more detail in the provision titled “Who Do We Share Personal Information With?”.
- We may disclose certain Personal Data to a third party in certain circumstances, as set out in more detail in provision “Who Do We Share Personal Information With?”.

Your obligations

- You must assist us by notifying us of any relevant change in your circumstances and ensuring your Personal Data is accurate at all times. You must also inform your dependents whose data you provide to us about the content of this Notice and provide them with a copy of this Notice and any relevant policies.
- You must comply with this Notice and our policies, standards, and procedures that are brought to your attention when handling any data or information to which you have access in the course of your relationship with us, including any Personal Data related to other individuals. In particular, you will not access or use any information for any purpose other than in connection with and to the extent necessary for your work with us. These obligations continue to exist after termination of your job application with us.

EU Data Subject Rights. In addition to the rights detailed under the provision titled “What Are Your Choices and Rights?”, you may have the following rights:

- AT ANY TIME, CONTACT US IF YOU WANT TO WITHDRAW YOUR CONSENT TO THE PROCESSING OF PERSONAL DATA. NOTE HOWEVER, THAT EXERCISING THIS RIGHT WILL NOT AFFECT THE LAWFULNESS OF PROCESSING BASED ON CONSENT BEFORE ITS WITHDRAWAL.
- Request to delete or restrict access to Personal Data. We will review your request and use our judgment, pursuant to the provisions of the applicable law, to reach a decision about your request.

If you exercise one (or more) of the above-mentioned rights, in accordance with the provisions of applicable law, you may request to be informed that third parties that hold your personal data, in accordance with this policy, will act accordingly.

- You may ask to transfer Personal Data in accordance with your right to data portability.
- We do not Process Personal Data or otherwise use it to make decisions about you that are solely based on automated Processing and we do not create a profile about you.
- You have a right to lodge a complaint with a data protection supervisory authority of your habitual residence, place of work or of an alleged infringement of the GDPR.

A summary and further details about your rights under EU data protection laws, is available on the EU Commission’s website at: ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens_en.

Transfer of Personal Data. We transfer Personal Data to Third Countries as detailed under the provision titled “International Data Transfer” to this Notice, to the territories detailed therein. When transferring Personal Data, we do so either under an adequacy decision by the EU Commission or by executing the appropriate module of



the Standard Contractual Clauses. You may obtain a copy of such Standard Contractual Clauses by contacting our HR team at career@idomoo.com.

How Do We Change this Notice?

From time to time, we will need to update this Notice. If the updates have minor if any consequences, they will take effect 7 days after we post the revised notice subject to this provision. If any change to this Notice materially affects you, we will use reasonable efforts to notify you in advance, such as by sending an email or posting a prominent notice of the changes. We will give you a reasonable period of time to object to any changes and we will seek affirmative consent if and where this is required by applicable data protection laws.

How to Contact Us?

Please contact our HR team at: career@idomoo.com for further information.