

# PRIVACY NOTICE

We at ICV-HR Ltd. ("ICV" "us", "we", or "our") recognize and respect the importance of maintaining the privacy of our customers. If not otherwise defined herein, capitalized terms have the meaning given to them in the Terms of Service, available at [www.sofiapp.in](http://www.sofiapp.in) (the "Terms"). This Privacy Notice describes the types of information we collect from you when you use our Platform and/or Services. This Privacy Notice also explains how we may process, transfer, store and disclose the information collected or otherwise received by us, as well as your ability to control certain uses of the collected information. In this Privacy Notice, "you" means any user of the Platform or Services, using the Platform or Services on behalf of an entity, individual or yourself ("Customer"), as well as any Applicant.

The Customer is the data controller in respect of the processing of Applicant Personal Information (as defined below) outlined in this Privacy Notice. ICV-HR Ltd. is the data controller in respect of the processing of Customer Personal Information outlined in this Privacy Notice. Our registered office is 4 Ben Shemen St., Tel Aviv, Israel and our registration number 515535441.

"Personal Information" means any information that refers, is related to, or is associated with an identified or identifiable individual or as otherwise may be defined by applicable law.

## PRIVACY NOTICE KEY POINTS

The key points listed below are presented in further detail throughout this Privacy Notice. These key points do not substitute the full Privacy Notice.

- **Personal Information We Collect.** When you register we collect Personal Information provided by you, such as your name, email address and job title. When you use our Platform and Services we also receive Personal Information of Applicants which they provide in their CV application, such as their name, email address and professional qualifications and educational qualification and history. We also (automatically) collect information about your use of the Platform and Services. If you contact us for questions or complaints, we will collect the information related to your inquiry.
- **Basis for Processing Personal Information.** Processing Personal Information is necessary for the performance of the Terms and the provision of the Platform and Services to you. Processing for the purposes of developing and enhancing our products and services, for analytics and usage analysis, for fraud prevention and security and for our recordkeeping and protection of our legal rights – are all necessary for the purposes of legitimate interests that we pursue.
- **How We Use the Information We Collect.** We use the information (including Personal Information) we collect mainly to administer and provide the Platform and Services, contact you with administrative information, and improve the Platform and Services.
- **Sharing the Personal Information We Collect.** We may share the Personal Information we collect: (i) with respect to Applicant information, with the relevant Customer on whose behalf we are processing such information; and (ii) with our service providers and subcontractors who assist us in the operation of the Platform and Services and process the information on our behalf and under our instructions.
- **International Transfer.** We may have Customers, use service providers and/or subcontractors and/or cooperate with or have

# PRIVACY NOTICE

business partners and affiliates located in countries other than your own, and send them your Personal Information. We will ensure to have agreements in place with such parties ensuring the same level of privacy and data protection as set forth in this Privacy Notice. You hereby consent to such international transfer.

- **Your Rights.** Subject to applicable law and additional rights as set forth below, you may have a right to access, update, transfer and/or delete your Personal Information and obtain a copy of the Personal Information we have collected about you. If you are a European Citizen, you may have the right to submit a complaint to the relevant supervisory data protection authority.
- **Use of Cookies.** We use cookies to help personalize your experience. You can adjust your settings to determine which cookies you do or do not allow. Changing your settings and/or deleting existing cookies may affect the Services.
- **Retention.** We retain information for as long as necessary for the purposes set forth in this Privacy Notice.
- **Security.** We implement industry standard measures aimed at reducing the risks of damage and unauthorized access or use of Personal Information.
- **Changes to the Privacy Notice.** We may change this Privacy Notice from time to time and shall notify you of such changes.

## INFORMATION WE COLLECT

We collect information from you when you choose to use our Platform and/or Services. In order to use our Platform and/or receive related Services, you will be required to register and provide us with certain Personal Information. If you use the Services by logging in through a third party login service, we may also receive Personal Information about you as provided by such third party login service. Please check such third party login's policies in order to understand what information we receive and/or share. We also collect Personal Information when you make use of the Platform and/or Services, request information from us, sign up for newsletters or our email lists, complete online forms, or contact us for any other reason.

Examples of the Personal Information that we collect from you may include your name, address, birth date, job title, phone number, email address, national ID number, professional qualifications, employment history, other professional and educational data and any other information an Applicant may provide, including in its resume. Such Personal Information may be collected by us through the Platform and Services.

We also collect any materials including images, texts and/or documents you may upload to the Platform and/or Services.

In addition, when you use the Platform, certain information may be automatically gathered about your computer or mobile device, such as operating system, IP address, and subject to your consent as may be required under applicable law, (geo) location.

It is your voluntary decision whether to provide us with any such Personal Information, but if you refuse to provide such information we may not be able to register you to the Platform and/or provide you with the Services.

# PRIVACY NOTICE

## HOW WE USE YOUR PERSONAL INFORMATION

### General

We and any of our trusted third-party subcontractors and service providers may use the Personal Information we collect from and about you for any of the following purposes: (1) to provide you with the Platform and/or Services; (2) to respond to your inquiries or requests, contact and communicate with you; (3) to develop new products or services and conduct analyses to improve our current content, products, and services; (4) to provide you with customized content, targeted offers, and advertising through the Platform and Services, or on other third-party sites or apps you may visit, or via email; (5) subject to your consent as may be required under applicable law, to contact you with informational newsletters relating to our Platform and Services; (6) to review the usage and operations of our Platform and Services; (7) to use your data in an aggregated, non-specific format for analytical purposes (as detailed below); (8) to prevent fraud, protect the security of our Platform and Services, and address any problems with the Platform and/or Services and (9) to provide customer support.

### Statistical Information

By analyzing all information we receive, including all information concerning users, we may compile statistical information across a variety of platforms and users ("Statistical Information"). Statistical Information helps understand trends and customer-needs so that new products and services can be considered and so existing products and services can be tailored to customer desires. Statistical Information is anonymous and aggregated and we will not link Statistical Information to any Personal Information. We may share such Statistical Information with our partners, without restriction, on commercial terms that we can determine in our sole discretion.

### Analytics

We, or our service providers or subcontractors, may use analytics tools ("Tools"), including "Google Analytics" to collect information about the use of the Platform and/or Services. Such Tools collect information such as how often users use the Platform, your activity on the Platform, and what other sites and mobile applications they used prior to using the Platform and/or Services. We use the information we get from the Tools to improve our Platform and Services. Google's ability to use and share information collected by Google Analytics about your visits to this site is restricted by the Google Analytics Terms of Use located at <http://www.google.com/analytics/terms/us.html> and the Google Privacy Policy located at <http://www.google.com/policies/privacy/>.

### Legal uses

We may use your Personal Information as required or permitted by any applicable law.

# PRIVACY NOTICE

## DISCLOSURE OF INFORMATION

We may share your information, including Personal Information, as follows:

### **Business Partners, Service Providers, Affiliates, and Subcontractors**

We may disclose information, including Personal Information we collect from and/or about you, to our trusted service providers, business partners, affiliates, subcontractors, who may use such information to: (1) help us provide you with the Site and/or Services; and (2) aid in their understanding of how users are using our Platform and Services.

### **Customers**

If you are an Applicant, we will share your Personal Information with the relevant Customer on whose behalf we are processing your Personal Information.

### **International Transfer**

We may have Customers and/or use subcontractors and service providers and have business partners and affiliates who are located in countries other than your own and send them information we receive (including Personal Information). We will ensure that these third parties will be subject to written agreements ensuring the same level of privacy and data protection as set forth in this Privacy Notice. You hereby consent to such international transfer.

### **Business Transfers**

We may transfer our databases containing your Personal Information if we sell our business or part of it.

### **Law Enforcement Related Disclosure**

We will fully cooperate with any law enforcement authorities or court order requesting or directing us to disclose the identity, behavior or digital content, including in the event of any user suspected to have engaged in illegal or infringing behavior. We may also share your Personal Information with third parties: (i) if we believe in good faith that disclosure is appropriate to protect our rights, property or safety (including the enforcement of the Terms and this Privacy Notice); (ii) to protect the rights, property or safety of third parties; (iii) when required by law, regulation subpoena, court order or other law enforcement related issues; or (iv) as is necessary to comply with any legal and/or regulatory obligation. You can request such Personal Information as specified herein by emailing us at [info@sofiapp.in](mailto:info@sofiapp.in).

### **Other Uses or Transfer of Your Information**

We allow you to use our Platform and Services in connection with third-party services, applications, sites or software. If you use our Platform and/or Services with or through such third-parties, we may receive information (including Personal Information) about you from those third parties. Please note that when you use third-parties outside of our Platform and/or Services, their own terms and privacy policies will govern your use of those services.

# PRIVACY NOTICE

## HOW WE PROTECT INFORMATION

We make efforts to follow generally accepted industry standards to protect the Personal Information submitted to us, both during transmission and once we receive it.

## HOW TO ACCESS AND LIMIT OUR USE OF CERTAIN INFORMATION

you have certain rights in relation to the Personal Information that we hold about you, as detailed below. We reserve the right to ask for reasonable evidence to verify your identity before we provide you with any information and/or comply with any of your requests, as detailed below:

- **Right of Access and Data Portability.** You have a right to know what Personal Information we collect about you and, in some cases, to have the information communicated to you. Subject to the limitations in applicable law, you may be entitled to obtain from us a copy of the Personal Information you provided to us (excluding information that we obtained from other sources) in a structured, commonly-used, and machine-readable format, and you may have the right to (request that we) transmit such Personal Information to another party. If you wish to exercise this right please contact us letting us know what information in particular you would like to receive and/or transmit. Subject to applicable law, we may charge you with a fee. Please note that we may not be able to provide you with all the information you request, for instance, if the information includes Personal Information about another person. Where we are not able to provide you with information that you have asked for, we will endeavor to explain to you why. We will try to respond to any request for a right of access as soon as possible.
- **Right to Correct Personal Information.** Subject to the limitations in applicable law, you may request that we update, correct or delete inaccurate or outdated Personal Information and/or that we suspend the use of Personal Information, the accuracy of which you may contest, while we verify the status of that Personal Information. We will correct your Personal Information within a reasonable time from the receipt of your written request thereof.
- **Deletion of Personal Information.** In certain circumstances you have a right to have Personal Information that we hold about you deleted. Should you wish to have any Personal Information about you deleted, please contact us, using the contact information specified in this Privacy Notice. Subject to applicable law, we will delete Personal Information provided to us by a user within a reasonable time from the receipt of a written (including via email) request by such user to delete such collected Personal Information. We cannot restore information once it has been deleted. Please note that to ensure that we do not collect any further Personal Information, you should also terminate your account with us. We may retain certain Personal Information (including following your request to delete) for audit and record-keeping purposes, as well as other purposes, all as permissible and/or required under applicable law. We may also retain your information in an anonymized form.
- **Account Deactivation.** You can ask us to deactivate your account by contacting us using the information below. In order to deactivate your account, we may ask you for additional information.
- **Supervisory Authority.** If you are a European Citizen, you may have the right to submit a complaint to the relevant supervisory data protection authority.

# PRIVACY NOTICE

## COOKIES

A cookie is a small piece of text that is sent to a visitor's browser. The browser provides this piece of text to the device of the originating visitor when this visitor returns. We use cookies to help personalize your ICV experience. A "persistent" cookie may be used to help save your settings and customizations. Also, if you log in to the application that we may provide through our Services, such a cookie will be used to recognize you as a valid user so you will not need to log in each time you use the application.

## HOW TO ADJUST YOUR PREFERENCES

Most web browsers are initially configured to accept cookies, but you can change this setting so your browser either refuses all cookies or informs you when a cookie is being sent. Also, you are free to delete any existing cookies at any time. Please note that some features of the Services may not function properly when cookies are disabled or removed.

## DATA RETENTION

We retain information as necessary for the purposes set forth above. We may delete information from our systems, once we deem it is no longer necessary for the purposes set forth above. Third-Party Applications and Services All use of third-party applications or services is at your own risk and subject to such third party's privacy policies.

## COMMUNICATIONS

Subject to your consent and applicable law, we may send you e-mail or other messages and/or a newsletter about us or our Services. You may remove your Personal Information from our mailing list and stop receiving future communication from us by following the UNSUBSCRIBE link located at the bottom of each communication or by emailing us at [info@sofiapp.in](mailto:info@sofiapp.in). You will also be given the opportunity to unsubscribe from commercial messages in any such e-mail or message we send, as well as through your account settings on the Platform. Please note that we reserve the right to send you service-related communications, including service announcements and administrative messages relating to your account, without offering you the opportunity to opt out of receiving them. Should you not wish to receive such communications you may cancel your account.

# PRIVACY NOTICE

## CHILDREN

We do not knowingly collect personally-identifiable information from children under the age of sixteen (16). In the event that you become aware that an individual under the age of sixteen (16) has enrolled without parental permission, please advise us immediately.

## CHANGES

When using the Platform and/or Services, you shall be asked to accept the terms of this Privacy Notice. If you do not agree with the terms hereof, please do not use the Platform or Services. We may update this Privacy Notice from time to time – in which case, we shall notify you of such changes. We will post the updated Privacy Notice on this page. Please come back to this page every now and then to make sure you are familiar with the latest version. Any new Privacy Notice will be effective from the date it is accepted by you.

## COMMENTS AND QUESTIONS

If you have any comments or questions about our privacy policy, or if you wish for us to amend or delete your Personal Information, please contact us at [info@sofiapp.in](mailto:info@sofiapp.in).

**Last updated: April 2018**