

# OLM Consulting Privacy Policy

*Last Revised: January 29 2024*

OLM Consulting and its affiliates (“**OLM**”, “**our**”, “**we**” or “**us**”) respects the privacy of its users, and is committed to protecting the information that you share with us in connection with your use of our online platform and content available therein, our website (“**Website**”), and any other services we may provide to you from time to time (together with Website and the content therein, the “**Services**”).

This privacy policy (“**Privacy Policy**”) governs, and is intended to describe, our practices regarding information (including Personal Data as defined below) that we may collect from you or about you when you use or access the Services, the ways in which we may use such information, and the choices and rights available to you. This Privacy Policy supplements and shall be read in conjunction with our Terms of Service (the “**Terms of Service**”), and may be supplemented by additional privacy statements, terms or notices provided to you. Capitalized terms that are not defined herein, shall have the meaning ascribed to them in our Terms of Service.

Users of our Services (referred to, unless otherwise specifically indicated, as “**Users**” or “**you**”) may include (i) individuals who use or access our Services in their capacity as employees, candidates, service providers, or other personnel of our customers (“**Customer(s)**”) including individuals identifying as a Customer “admin” users, using or accessing the platform or any of our Services under Customer’s account or on Customer’s behalf (each, a “**Customer End-User**”); and (ii) visitors of the Website (each, a “**Visitor**”).

**IMPORTANT NOTE:** where we process Personal Data of/about Customer End-Users, we do so on behalf of and under the instruction of the respective Customer (which Customer may be your employer, or other corporation on behalf of which you are using the platform, or otherwise using our Services) OLM does so in its capacity as a “data processor” on behalf of such Customer. For more information about our practices as a data processor and the impact on your Personal Data in our possession, please see below. The provisions of this Privacy Policy as they relate to OLM’s independent privacy and data processing activities (as a “data controller”) – with respect to Users who are Visitors, or individual end-users - do not apply to the processing of Personal Data of Customer End-Users. If you are using our Services (including the platform) as a Customer End-User, or if otherwise you have any questions or requests regarding Customer End-Users’ Personal Data, please contact the Customer on behalf of whom you use the platform.

PLEASE READ THIS PRIVACY POLICY BEFORE ACCESSING OR USING OUR SERVICES OR ANY PART/COMPONENT THEREOF. BY ACCESSING OR USING THE SERVICES, YOU AGREE TO THE TERMS AND CONDITIONS SET FORTH IN THIS PRIVACY POLICY, INCLUDING TO THE COLLECTION AND PROCESSING OF YOUR PERSONAL DATA (AS DEFINED BELOW). IF YOU DISAGREE WITH ANY TERM PROVIDED HEREIN, YOU MAY NOT ACCESS OR USE THE SERVICES/PLATFORM.

PLEASE NOTE: YOU ARE NOT OBLIGATED BY LAW TO PROVIDE US WITH ANY PERSONAL DATA. YOU HEREBY ACKNOWLEDGE AND AGREE THAT YOU ARE PROVIDING US WITH PERSONAL DATA AS DESCRIBED IN THIS PRIVACY POLICY AT YOUR OWN FREE WILL. YOU HEREBY AGREE THAT WE MAY COLLECT AND USE SUCH PERSONAL DATA PURSUANT TO THIS PRIVACY POLICY AND ANY APPLICABLE LAWS AND REGULATIONS.

TO THE EXTENT THAT YOU PROVIDE US WITH ANY PERSONAL DATA RELATED TO ANY THIRD PARTY OR ANY OTHER PERSON OR ENTITY WHICH IS NOT YOU, INCLUDING INFORMATION RELATED TO ANY OF YOUR PERSONNEL, YOU ARE SOLELY RESPONSIBLE TO RECEIVE AND HEREBY REPRESENT THAT YOU HAVE AND UNDERTAKE THAT YOU SHALL HAVE AT ALL TIMES, MAINTAINED AND RECEIVED, THE CONSENT, AUTHORITY, PERMISSION AND APPROVAL OF SUCH PERSONS OR ENTITY AND PROVIDED THEM WITH SUFFICIENT DISCLOSURES, TO ALLOW GLIMPSE TO ACCESS, STORE, COLLECT, ANALYZE AND PROCESS SUCH PERSONAL DATA AS DETAILED HEREIN.

Our Privacy Policy explains:

1. Information we collect; Categories and types of data
2. Our legal basis for use of your data
3. With whom do we share your personal data?
4. Storage and data transfer
5. Data retention
6. Using cookies and other tracking technologies
7. Information security
8. updating, obtaining a copy of, or deleting your personal data
9. Minors
10. Customer End-Users Personal Data
11. Changes to the Privacy Policy
12. General information
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## 1. INFORMATION WE COLLECT; CATEGORIES AND TYPES OF DATA

First – What is Personal Data? “**Personal Data**” is information that identifies an individual or may, with reasonable efforts or together with additional information we have access to, enable the identification of an individual, or may be of a private or sensitive nature relating to an identified or identifiable natural person. Identification of an individual also includes the association of such individual with a persistent identifier such as a name, an identification number, persistent cookie identifier etc. Personal Data does not include information that has been anonymized or aggregated; provided that, such information can no longer be used to identify a specific natural person.

In the course of accessing or otherwise using our Services, we receive your Personal Data through the following sources, and collect and process it through the following respective methods of collection:

### *Data actively provided by you*

- Information actively provided by the Customer End-User: information such as age, gender, job title and email, position, company’s information and other Personal Data which may be contained in the materials and information you actively and/or voluntarily generate. When you are provided with the Services as Customer End-User, we will collect your full name, age, gender, job title, materials and information you actively and/or voluntarily generate, and your answers to the Digital Questionnaire (as defined in the Terms of Services).
- Support and communication data: If you contact us, for instance through our Website, or respond to messages and communications that we send to you, we may keep a record of that correspondence and communication.
- Information mandated by applicable law: Information we are required or otherwise authorized to collect under applicable laws to authenticate or identify you or to verify the information we have collected from you via our Services.

### *Personal Data we collect automatically when you use our platform, access our Website or receive related services*

- Usage and Impression Data: details about how you use or interact with our Services, such as session time and duration, the content you accessed on the platform and Website, pages you visited, methods used to browse away from a page, as well as information about the frequency and scope of your use of the platform and Website, such as your clicks and views.
- Device and Technical Information: We may collect information from and about the device(s) you access or use our Services, including, without limitation, as follows:
  - 1) Identifiers: identifiers such as IP address, device identifiers and ad identifiers, etc., the country or region that you are browsing from can be derived from your IP address.
  - 2) Device signals: Wi-Fi access points, connection speed, etc.

3) Cookie data: data from cookies stored on your device, including cookie IDs and settings.

Please review section 6 below (*Using Cookies and Other Tracking Technologies*) to learn more about how we use cookies and other tracking technologies.

***Personal Data collected from other third parties***

- You understand that the Services may access, make available, and store (if applicable) such information so that it is available on and through the Services. THEREFORE, YOU MAY ONLY PROVIDE US PERSONAL DATA OR ALLOW US ACCESS THERETO IN ACCORDANCE WITH THIS PRIVACY POLICY.
- We may also collect Personal Data concerning you, from other third parties who have assured us that they have obtained your consent for such provision of information. For example, we may collect and use information regarding Customer End-User which we may have received from the Customer with respect to the Customer End-User answering Digital Questionnaire and engaging with the platform on behalf of the Customer.

**If we combine Personal Data with non-Personal Data, the combined data will be treated as Personal Data.**

**2. OUR LEGAL BASIS FOR USE THE OF YOUR DATA**

a. Legal grounds for the collection and processing of Personal Data:

- **Provision of the Services:** We collect and process your Personal Data to provide our Services (in accordance with this Privacy Policy and in accordance with contractual obligations pursuant to applicable law), following your acceptance of this Privacy Policy; to maintain and improve our Services; to develop new services and features for our users and customers; and to personalize the Services in order to provide a better user experience.
- **Legitimate interests:** We process your Personal Data for our legitimate interests while applying appropriate safeguards that protect your privacy. Our legitimate interests may span things like detecting, preventing, or otherwise addressing fraud, abuse, security, usability, functionality, or technical issues with our Services, protecting against harm to the rights, property or safety of our properties, users, or the public as required or permitted by law; enforcing legal claims, including investigation of potential violations of this Privacy Policy or defending against legal claims made by you or on your behalf.
- **With your consent:** We ask for your agreement to process your Personal Data for specific purposes and you have the right to withdraw your consent at any time.
- **Compliance with legal obligations:** We may use your Personal Data in order to: comply with any applicable law, rule, regulation, guidelines, industry standards, or other governmental authority; respond to or defend against legal proceedings brought against us or our affiliates; prevent fraud; investigate violations, and enforce our policies, including but not limited to our Terms of Service.

b. We may use your Personal Data for the following purposes:

- to provide, operate and improve the Services;
- to create aggregated statistical data and other aggregated and/or inferred non-personal data, which we may use to provide and improve our respective services;
- to be able to contact you for the purpose of providing you with technical assistance, support and complaints and collect feedback, if you approach us with such requests and provide us with your contact details for such purposes;
- to verify your identity when we are approached with a request to exercise any of your rights hereunder or under our Terms of Service;

- to prevent, detect, mitigate, and investigate fraud, security breaches or other potentially prohibited or illegal activities, including any breaches of this Privacy Policy or of our Terms of Service;
- to perform functions or services as otherwise described to you at the time of collection;
- to comply with any applicable rule or regulation, to protect our legal interests, and/or respond to or defend against (actual or potential) legal proceedings against us or our affiliates.

We also analyze and use the Personal Data that we collect on an anonymized or aggregated basis for product development, to analyze the performance of our Services, to troubleshoot and to improve and optimize the Services, and to ensure the best user experience for our users as a whole.

### 3. WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

We may share your Personal Data with third parties (or otherwise allow them access to it) only in the following manners and instances:

- **Internal Concerned Parties:** We share your Personal Data with our employees and other personnel, for the purposes described in this Privacy Policy and in accordance with Section 2 above (*Our Legal Basis for Use of Your Data*). In addition, should OLM or any of its affiliates undergo any change in control, including by means of merger, acquisition, or purchase of substantially all of its assets, your Personal Data may be shared with the parties involved in such event under strict security condition, for the purpose of evaluating such event and in accordance with the terms of this Privacy Policy. If we believe that such change in control might materially affect your Personal Data then stored with us, we will notify you of this event and the choices you may have you via e-mail and/or a prominent notice on our Services.
- **Protecting Rights and Safety:** We may share Personal Data to enforce this Privacy Policy and/or the Terms of Service, including investigation of potential violations thereof; to detect, prevent, or otherwise address fraud, security or technical issues; to respond to claims that the content, information or materials available on the Services or related to thereto violates any rights; or otherwise if we believe in good faith that this will help protect the rights, property or personal safety of OLM, any of our users, or any member of the general public.
- **Third Parties & Customers:** When using our Services as a Customer End-User we will share your Personal Data with the applicable Customer with which you are affiliated (on behalf of whom we process your information), in accordance with this Privacy Policy. We may partner with certain third parties to provide selected services that are used to facilitate and enhance the Services and your use thereof (“**Service Providers**”). Such Service Providers may have access to, or process on our behalf Personal Data that we collect, hold, use, analyze, process, and/or manage. These Service Providers include among others, hosting, database, and server co-location services (e.g., AWS), data analytics services (e.g., Google Analytics, Microsoft Clarity), e-mail distribution and monitoring services (e.g., Hubspot), and our business, legal and financial advisors. We remain responsible for any Personal Data processing done by Service Provider on our behalf, except for events outside of our and/or their reasonable control, and except with respect to Service Providers with whom you are contractually engaged, either through a prior separate contractual engagement and/or through acceptance of their privacy policy and terms of use.
- **Law enforcement, legal proceedings, and as authorized by law:** We may disclose or otherwise allow access to Personal Data pursuant to a legal requirement or request, such as a subpoena, search warrant, or court order, or in compliance with applicable laws and regulations. Such disclosure or access may occur with or without notice to you, if we have a good faith belief that we are legally required to do so, or that disclosure is appropriate in connection with efforts to investigate, prevent, or take action regarding actual or suspected illegal activity, fraud, or other wrongdoing.

### 4. STORAGE AND DATA TRANSFER

Information regarding the Users (including without limitation, Personal Data of Customer End-Users), may be maintained, processed, and stored by us and our authorized affiliates and Service Providers in the EU and in Israel.

While the data protection laws in the above jurisdictions may be different from the laws of your residence or location, please know that we, our affiliates, and the Service Providers that store or process your Personal Data on our behalf are each committed to keep it protected and secured, pursuant to this Privacy Policy, regardless of any lesser legal requirements that may apply in their jurisdiction.

Specifically, each of our third party Service Providers that store or process your Personal Data either: (i) assured us that they provide adequate safeguards to protect your rights to privacy including where applicable, by undertaking to comply with the EU Standard Contractual Clauses; (ii) where applicable, hold and process such Personal Data on our behalf in jurisdictions which have been determined to ensure adequate level protection by the EU Commission; (iii) perform such processing pursuant to your consent and acceptance of their privacy policy as further detailed in this Privacy Policy.

By providing your Personal Data, you expressly consent to the place of storage and transfer described above, including transfers outside of the jurisdiction in which the information was provided.

## 5. DATA RETENTION

We retain the Personal Data we collect or receive from you as needed in order to provide the Services and as otherwise necessary to comply with applicable laws and regulations. If you withdraw your consent to us processing your Personal Data, we will delete your Personal Data from our systems (except to the extent such data in whole or in part is required to comply with any applicable rule or regulation and/or to respond to or defend against legal proceeding brought against us or our affiliates), except where we process Customer End-Users information on behalf of our Customer (such as your employer, or other entity you are affiliated with in connection with the use of our Services), in which case data retention is subject to such Customer's instructions, as further described below.

## 6. USING COOKIES AND OTHER TRACKING TECHNOLOGIES

We may use certain monitoring and tracking technologies to understand how Users use our Services, including ones offered by third-party Service Providers. These technologies are used in order to maintain, provide, and improve our Services on an ongoing basis, and in order to provide a better experience to our Users. For example, these technologies enable us to (i) keep track of and "remember" our Users' preferences and authenticated sessions, (ii) secure our Services by detecting abnormal behaviors, (iii) identify technical issues and improve the overall performance of our Services, and (iv) create and monitor analytics. For the avoidance of doubt, we will not use tracking technologies as part of the Digital Questionnaire.

**Cookies:** A cookie is a small data file that is downloaded and stored on your device when you access our Services. Learn more about cookies here: [www.allaboutcookies.org](http://www.allaboutcookies.org). We and our service providers may use cookies because they are:

- essential for us to provide our Services to you;
- help us optimize, personalize and/or otherwise improve your experience and/or the performance of the platform (excluding the Digital Questionnaire) and the Website;

Most web browsers allow you to erase cookies on your computer, block cookies from your computer, or notify you when a cookie is stored on your computer. If you choose to disable or otherwise block certain cookies, you may be unable to use, or experience decreased functionality with, parts of the Services.

**Tracking Technologies:** When you visit or access our Services, we may use (and may authorize third parties to use) cookies, web beacons, pixel tags, scripts, tags, API, and other technologies ("**Tracking Technologies**"). The Tracking Technologies allow us to automatically collect information about you, your online behavior, and your device, in order to enhance your navigation on our Services, improve our Services performance and customize your experience on our Services. We may also use this information to collect statistics about the usage of our Services and perform analytics. Your interactions with these features are governed by the privacy policies of the OLM that provides these features.

## **7. INFORMATION SECURITY**

We take great care in implementing and maintaining the security of the Services and your Personal Data. We and our trusted service providers use a variety of industry-standard security technologies and procedures to help protect your personal information from unauthorized access, use, or disclosure.

Although we take reasonable steps to safeguard information, we cannot be responsible for the acts of those who gain unauthorized access or abuse our Services, and we make no warranty, express, implied, or otherwise, that we will prevent such access.

If you have any questions about security with respect to our Services, or if any person attempted to abuse our Services or acted in an inappropriate manner, please contact us directly at [osnat@olm-consulting.com](mailto:osnat@olm-consulting.com).

## **8. MINORS**

To use our Services, you must be over the age of eighteen (18). Therefore, we do not knowingly collect Personal Information from minors under the age of eighteen (18) and do not wish to do so. We reserve the right to request proof of age at any stage so that we can verify that minors under the age of eighteen (18) are not using the Services.

## **9. CUSTOMER END-USERS PERSONAL DATA**

OLM is the “data processor” of personal data contained in Customer End-Users’ Personal Data, as submitted or otherwise provided to us by our Customers and/or Customer End-Users. We process such data on behalf of our Customer (who, in turn, is the “data controller” of such data) and in accordance with its reasonable instructions, and our commercial agreements with such Customer.

Our Customers are solely responsible for determining whether and how they wish to use our Services, and for ensuring that all individuals using the Services on the Customer’s behalf or at their request, as well as all individuals whose personal data may be included in any data processed through the Services, have been provided with adequate notice and given informed consent to the processing of their personal data, where such consent is necessary or advised, and that all legal requirements applicable to the collection, use or other processing of data through our Services are fully met by the Customer. Our Customers are also responsible for handling data-subject rights requests under applicable law, by their Customer End-Users and other individuals whose data they process through the Services.

If you would like to make any requests or queries regarding personal data we process as a data processor on our Customer’s behalf, including accessing, correcting, or deleting your data, please contact the Customer and/or an applicable Customer End-User directly.

## **10. CHANGES TO THE PRIVACY POLICY**

We reserve the right to change this Privacy Policy at any time, so please re-visit this page frequently. We will notify you regarding substantial changes to this Privacy Policy through the Website and/or by sending you an email regarding such changes to the email address that you provided us (if any). Such substantial changes will take effect seven (7) days after such notice was provided on our Services or sent by email. Otherwise, all other changes to this Privacy Policy are effective as of the stated “Last Revised” date stated herein, and your continued use of the Services after the Last Revised date will constitute acceptance of, and agreement to be bound by, those changes.

## **11. GENERAL INFORMATION**

This Privacy Policy, its interpretation, and any claims and disputes related hereto, shall be governed by the laws of the State of Israel. Any and all such claims and disputes shall be brought in, and you hereby consent to them being litigated in and decided exclusively by a court of competent jurisdiction located in Tel Aviv, Israel.

This Privacy Policy was written in English and may be translated into other languages for your convenience. If a translated (non-English) version of this Privacy Policy conflicts in any way with the English version, the

provisions of the English version shall prevail. User acknowledges that the User's knowledge of English allowed it to understand all of the terms and conditions detailed in these Terms.

## **12. CONTACT US**

If you have any questions (or comments) concerning this Privacy Policy, you are welcome to send us an email at: please [osnat@olm-consulting.com](mailto:osnat@olm-consulting.com) and we will make an effort to reply within a reasonable timeframe.