

#### PRIVACY POLICY

#### 1. GENERAL

This Website is operated by Experis I.T.S. Ltd., an Israeli company also on behalf of the following subsidiaries - Experis Cyber Ltd., Experis Software Ltd., Experis BI Ltd. (collectively, the "Experis Group"). The webpages in the Website directing to the various Experis services - Experis Cyber, Experis IT, Experis Academy and the Experis Jobs webpage including its related sub-domains (collectively the "Website" or "Experis Website[s]") are all included under this privacy policy (the "Privacy Policy").

In this privacy policy when we refer to "Experis", "our", "we" or "us", we mean and any of those Experis Group companies.

This Privacy Policy applies to the Experis' Websites only. For information regarding privacy when engaging with the Experis Group's various services, which are subject to separate privacy policies, you may contact us at DPO@manpowergroup.co.il.

We at Experis respect our Users' right for privacy with regards to the use of their Personal Data. We have adopted this Privacy Policy, as may be amended from time to time, to ensure you are fully informed and aware as to the scope and nature of the Personal Data Experis collects and otherwise receives from or about you while you browse and interact with our Website and how your Personal Data it being processed by Experis.

PLEASE READ THIS POLICY AND MAKE SURE YOU FULLY UNDERSTAND OUR PRACTICES IN RELATION TO YOUR PERSONAL DATA, BEFORE YOU ACCESS OR USE THE WEBSITE. 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: DPO@manpowergroup.co.il.

#### 2. DEFINITIONS

For the purpose of this Privacy Policy, the following terms shall have the respective meanings set forth besides them, unless the context requires otherwise:

- 2.1. "Non Personal Data" means any information, data or content which is collected, processed or otherwise generated by Experis about or from your Use of the Website which is anonymous or does not personally identify you or reveal your specific identity as an individual and cannot be attributed to you (such as your browser type, technical device information, etc.).
- 2.2. "Candidate Data" means Personal Data you upload to the Website or otherwise provide us in order to apply for a position published on our Website or elsewhere or submit a request to receive job offers from us regarding employment or various certification programs available at the Experis Websites.



- 2.3. "Personal Data" means any information, data or content you upload to the Website or provide us, which can identify you personally or can otherwise be attributed to you as an individual, or as otherwise defined in data protection laws. Personal Data includes User Data (as defined below).
- 2.4. "Process" shall have the meaning ascribed to it under applicable data protection laws.
- 2.5. "Use" shall mean any access, view, visit or browsing of the Website, for any purpose.
- 2.6. "User", "you" or "your" (including any variations thereof) means any individual or entity that Uses the Website for any purposes, using a computer or any other device, including a mobile device or by any other means of communications.
- 2.7. "Visitor Data" means Personal Data you upload to the Website in order to contact us, for instance, if you are an employer interested in our human resourcing services or an individual seeking employment.
- 2.8. "User Data" shall mean Candidate Data and Visitor Data, together.

### 3. COLLECTION OF DATA

We collect and Process two types of data: Personal Data and Non-Personal Data. As for Personal Data, we collect Candidate Data and Visitor Data. In any event, the collection and Processing of User Data commences on your first Use of the Website, and may be executed by the User Data you independently or otherwise upload to the Website, and by technological tools we implement in the Website in order to collect or otherwise Process the User Data.

#### **3.1.** Collection of Personal Data

- 3.1.1. No Legal Requirement. Where applicable, we hereby inform you, and you hereby acknowledge that you have no legal obligation to provide us with any Personal Data (or any other data) when you use the Website, and the provision of it is solely based on your free will. However, you are aware that without the provision of your Personal Data, we will not be able to reply to your enquiries or offer you a job and some of the features on the Website may be unavailable to you.
- 3.1.2. Your Consent. Where applicable, by Using the Website and uploading Personal Data to the Website, you hereby represent, acknowledge and provide your informed consent to the following:
  - 3.1.2.1. The Personal Data is yours, you have the legal right to provide us with it, and that it is complete, accurate and true;
  - 3.1.2.2. The Personal Data you provide will be stored in our database(s), and will be Processed by Experis (including, third parties acting on our behalf as specified further below) for the purposes as specified in this Privacy Policy.
- **3.2.** Personal Data You Provide.

The types of Personal Data you provide us with may include (by way of a non-exhaustive list) the following:



- 3.2.1. When you Use the "contact us" form or otherwise send a request to directly engage with us through the Website, the Visitor Data you will be required to provide us is your full name and email, optionally (at your choice) provide us also with your phone number, and the subject of your request (type of service required). You may also provide us with any other information you decide to include in the open text box.
- 3.2.2. When you Use the Website in order to apply for a position published on our Website or to receive job offers from Experis, You will be required to upload your personal resume, as well as provide us with your full name, email address, and phone number (herein referred to as your "Application").
- 3.2.3. When you Use the Website in order to apply for training courses published on our Website or submit a request to apply to the Experis Academy certification programs, You will be required to provide us with your full name, email address, phone number and the course which you are interested in.
- 3.2.4. If you are looking to hire professionals through our hi-tech positions tab on the Website, you will be required to provide us with your full name, the organization you work at, position, e-mail, phone number, type of service required and any other information you decide to include in the open text box.
- **3.3.** Personal Data We Collect or Generate.
  - 3.3.1. When you Use the Website, we may automatically collect Personal Data from you, such as:
    - 3.3.1.1. Technical information, including the Internet protocol (IP) address used to connect your computer to the internet, domain name and country which requests information and information about the device used to access the Website and your preferences;
    - 3.3.1.2. Information about your visit and usage, including the Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time), time and length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, traffic data, location data, weblogs and other communication data and information provided when requesting further service or downloads; and
    - 3.3.1.3. Location information, which may be determined through your IP address.
  - 3.3.2. To collect this information, we use cookies and other tracking technologies. Cookies are small pieces of text sent by your browser to your device. Cookies can be persistent (cookies that remain on your device for a set period of time or until you delete them) or session (cookies that are deleted as soon as you close your browser). When you use the Services, we and our third-party providers may place a number of cookies on your device. A list of all cookies we use, their purpose, and the information they collect can be found here Experis Group Cookie Policy. Particular third-party cookies we use include, inter alia the following:
    - 3.3.2.1. *Facebook Pixel.* We use Facebook Pixel to customize our advertising and to serve you ads on your social media based on your browsing behavior. This allows your behavior to be tracked after you have been redirected to our Website by clicking on the Facebook ad. The Facebook Pixel stores a cookie on your device to enable us to



measure the effectiveness of Facebook ads for statistical and market research purposes. We do not have access to the information collected through theFacebook Pixel. However, the information collected via the Facebook Pixel, on the Website as well as other websites on which Facebook Pixel is installed, is also stored and processed by Facebook. Facebook may link this information to your Facebook account and also use it for its own promotional purposes in accordance with Facebook's Data Usage Policy. The Facebook Pixel also allows Facebook and its partners to show you advertisements on and outside of Facebook. You can opt-out of displaying Facebook ads by visiting your Facebook Ad Settings, and you can clear and control the information third parties share with Facebook in your Off-Facebook Activity page. If you do not have a Facebook account, you can opt-out of Facebook ads through the European Interactive Digital Advertising Alliance here.

- 3.3.2.2. *Google Analytics.* We use Google Analytics to collect information on your use of the Website to improve our Website. In order to collect this information, Google Analytics may set cookies on your browser, or read cookies that are already there. Google Analytics may also receive information about you from applications you have downloaded that partner with Google. We do not combine the information collected through the use of Google Analytics with personally identifiable information. See <a href="http://www.google.com/policies/privacy/partners/">http://www.google.com/policies/privacy/partners/</a> for information about how Google uses the information provided to Google Analytics. You can control the information provided to Google and opt out of certain ads provided by Google by using any of the methods set forth here or using the Google Analytics opt out browser add-on here.
- 3.3.3. To disable cookies and limit the collection and use of information through them, you can set your browser to refuse cookies or indicate when a cookie is being sent. To find out how to block, control or delete cookies, please visit: https://www.aboutcookies.org/, which also provides information on how to control or delete cookies from specific browsers. When you opt-out, and opt-out cookie will be placed on your device. The opt-out cookie is browser and device specific and will only last until cookies are cleared from your browser or device. Note that blocking cookies may render some or all Service features useless.

#### 4. HOW WE USE YOUR PERSONAL DATA

Personal Data that you provide us with and we Process may be used by us for the following main purposes:

- **4.1.** If you send us Candidate Data we will use it in order to review and assess your Application, contact you regarding your Application, submit your Application to the designated employer or to any other relevant employer or any third-party as we may see fit, as applicable in accordance to the contents of your Application.
- **4.2.** If you send us Visitor Data we will use it in order to contact and communicate with you regarding the subject matter of your contact request.
- **4.3.** If we collect your IP address, we will use it in order to identify you as a User on your next visit to the Website, without the necessity of entering your details.
- **4.4.** for sending marketing materials. In order to do so, in some jurisdictions we will obtain your prior consent or otherwise act as required by applicable law.



- **4.5.** in order to approach you in the future with job offers which may apply to you based on your Application, and, as applicable, in accordance with the contents of your Application and subject to your prior consent (if required by applicable law).
- **4.6.** To ensure that the Website is functioning correctly and to monitor, investigate any bug with, and improve the Website and provide support.
- **4.7.** For research purposes and for further analysis and statistics, where data will be anonymized where possible, to improve our Website and services (for example, we analyze information collected through cookies which to help us understand behavior when accessing the Website).
- **4.8.** in order to enforce this Privacy Policy, resolve disputes, exercise or defend our legal rights, comply with any applicable law, regulations or requests from competent authorities, or, as otherwise authorized by you.

#### 5. COLLECTION OF NON-PERSONAL DATA

- **5.1.** General. In addition to the categories of Personal Data described above, we may collect and Process Non-Personal Data derived when you Use our Website.
- **5.2.** Non-Personal Data we Collect. Experis collects information that your browser or device sends about how Users locate and navigate the Website, which may include, but is not limited to, browser type, operating system version, referring URL, the number and frequency of users to each web page, the length of their stays, etc.
- **5.3.** How we Collect Non-Personal Data. We may use technological tools for the collection of Non-Personal Data, as detailed in Section 3.3 above (such as cookies and pixels), and as may be further added from time to time. A list of all cookies we use, their purpose, and the information they collect can be found here Experis Group Cookie Policy.
- **5.4.** How we Use Non-Personal Data. We may use Non-Personal Data for the same purposes we use Personal Data (where applicable) and also for the following purposes: (a) To monitor and analyze your Use of the Website; (b) For technical administration and troubleshooting of the Website; (c) To improve the usefulness and quality of the Website and to enhance the positioning of the Website within Internet search engines; (d) To gather statistical data and system analytics data about how the Website is being used; (e) To assist in determining the effectiveness of our Website content and advertising; (f) For commercial research and further development; (g) For any other legitimate purpose.

#### 6. LAWFUL BASIS FOR PROCESSING

- **6.1.** We only process Personal Data where we have a lawful basis to do so. The lawful basis will depend on the reasons we collected the Personal Data and purposes we use your Personal Data, and may differ according to applicable data protection laws.
- **6.2.** The lawful basis for processing User Data will be: (a) when you gave us your consent for processing your User Data for a specific purpose. For example, if you sent us your Candidate Data in order to apply to a job offer published on the Website; or, (b) when it is necessary for the performance of a contract with you. For example, we will process your Visitor Data to address your query in the Website, or to send you offers of employment in the future or marketing communications; (c) where we have a legitimate interest to process the User Data or there is a legitimate interest of others. For example, to identify and prevent abuse of the Website, to improve the performance of the Website



or to ensure the security of the Website; and (d) To comply with any legal obligation that may apply to us. For example, to disclose information to competent authorities.

7. YOUR RIGHTS

In this section, we inform you what rights you have with respect to the Processing of your Personal Data. Please note that your rights may differ, dependent on your jurisdiction and the applicable data protection laws:

- 7.1. You may have the right to access and review your Personal Data which we Process;
- **7.2.** You may have the right to have your Personal Data rectified to the extent it is incorrect, incomplete or not processed in compliance with applicable data protection laws;
- **7.3.** You may be entitled to require that we erase certain parts of your Personal Data if its processing is not justified;
- **7.4.** You may have the right to ask for the transfer of your Personal Data that you provided us to other controllers;
- **7.5.** In some circumstances, you have the right to withdraw consent (where the lawful basis for Processing is consent);
- **7.6.** Under certain circumstances, you may have the right to object to the Processing of your Personal Data;
- **7.7.** You have the right to lodge a complaint before the applicable supervisory authority of your jurisdiction.

If you wish to exercise any of your rights, please contact us at DPO@manpowergroup.co.il. We will act in accordance with the applicable data protection laws, in order to comply with your request.

#### 8. SHARING PERSONAL DATA WITH OTHERS

We may share Personal Data with third-parties, as set forth below:

- 8.1. Service Providers. We may share Personal Data with our contracted service providers and subcontractors so they can provide us services required for us to operate the Website or provide our services, such as cloud and IT vendors, hosting, advertisers, companies that provide analysis and processing activities, companies that provide us marketing and promotional services.
- **8.2.** Manpower Group. We may share Personal Data within the Manpower group of companies to which we are affiliates, as well as within the Experis Group of companies, as required to run and manage our business.
- **8.3.** Business Transfers. If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets or transition of service to another provider, the Personal Data may be transferred to a successor or affiliate as part of that transaction.
- **8.4.** Analytics. with analytics providers that assist us in the improvement and optimization of the Website and process Personal Data in the context of provision of analytical services to us.



- **8.5.** Protection of Rights. if we need to do so to establish, exercise, protect or defend our contracts or legal rights, or the rights of others including our employees and affiliates, or detect, investigate, prevent, or take action against illegal activities, fraud, or situations involving potential threats to the rights, we may share Personal Data with investigators, advisors, consultants or law enforcement authorities.
- **8.6.** Official Authorities. 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. INTERNATIONAL TRANSFER OF DATA

We may store, Process or maintain User Data in various sites worldwide, including through cloudbased service providers. Where applicable, by using the Website, you hereby provide your informed consent to the transfer of your Personal Data to countries outside your state or country to countries in which the level of data protection may not be as protective as the level in your country.

Where the GDPR applies and we transfer Personal Data to another country outside the EEA, we will ensure that it is protected and transferred in a manner consistent with legal requirements. In relation to data being transferred outside of the EEA, for example, this may be done in one of the following ways:

- **9.1.** The country that we send the data is approved by the European Commission as offering an adequate level of protection for Personal Data;
- **9.2.** such transfer is subject to the conditions set forth in the EU Commission Standard Contractual Clauses (in the relevant module) for the transfer of personal data to third countries, adopted by the European Commission via its implementing decision of 4 June 2021, or any set of clauses approved by the European Commission which amends, replaces or supersedes the SCCs; or –
- **9.3.** In other circumstances, the law may permit us to otherwise transfer your Personal Data outside the EEA.

Further details on the steps we take to protect your personal information, in these cases, is available from us on request by contacting us by email at DPO@manpowergroup.co.il at any time.

## 10. DATA RETENTION

Subject to your right to have your Personal Data corrected, not further processed or deleted in accordance with Section 7 above, we retain different types of Personal Data for different periods, depending on the purposes for processing, our legitimate business purposes as well as pursuant to legal requirements under applicable law. We will retain Personal Data for as long as required and needed to comply with our legal obligations or to pursue our legitimate business purposes and to establish, exercise or defend our legal rights. Unless otherwise restricted under applicable law. Non-Personal Data will be retained indefinitely.

11. SECURITY



We are committed to protecting the security of Personal Data. We use a variety of administrative, technical, and physical security technologies and procedures to help protect your Personal Data from unauthorized or accidental access, use, or disclosure. In the course of provision of your Personal Data to us, your Personal Data is likely to be transferred over the internet and/or stored on a cloud-based server. Although we strive to protect your Personal Data, the transmission of information over the internet and storage in a cloud-based server is not completely secure. As such, you acknowledge and accept that we cannot ensure or warrant the security of your Personal Data , and accordingly you assume all risk associated with Using our Website and agree that we will not, under any circumstances, be liable to you in this respect.

## 12. CHILDREN'S PRIVACY

This Website is not meant to be used by 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 18. If these age requirements are not met, you are required not to use the Website.

# 13. CHANGES TO THIS PRIVACY POLICY

If we decide to change our Privacy Policy, we will post the updated policy on our Website so that you may be aware of the changes. We reserve the right to modify this Privacy Policy at any time, so please review it frequently.

## 14. CONTACT US

If you have comments or questions about our Privacy Policy or the information practices of the Website, please contact us through the following email DPO@manpowergroup.co.il.

Where the GDPR applies, if you are not satisfied with the response you receive from us or you think that your rights have been infringed by us, you may escalate your concerns to the applicable privacy regulator in your jurisdiction. Upon request, we will provide you with the contact information for that regulator. However, we recommend you contact us first – and we will do our best to resolve any complaint.