



## PRIVACY POLICY

myInterview Ltd. (together with [myInterview UK Ltd, myInterview Solutions Pty Ltd] and any of its other affiliates companies - "myInterview," "we," "our" or "us") recognizes the importance of maintaining the privacy and security of personal data that we collect.

myInterview provides a video interviewing platform through which employers can interview candidates and manage the hiring process.

This Privacy Policy applies to myInterview's platform and services (the "**Services**"), and describes how we collect, store, use, and disclose the following types of information:

1. **User Data** relating to individuals who are employees or users on behalf of our corporate customers ("**Customers**"), who are registered to the Services and use them to engage with Candidates, conduct video interviews, and determine their suitability to the job while receiving relevant insights through the Services ("**User**" or "**Users**");
2. **Candidate Data** relating to individuals whose job candidacy is evaluated through the Services by the relevant User ("**Candidate**" or "**Candidates**");
3. **Website Visitor, CRM & Prospects Data** relating to visitors of our website, participants at our events, partners, investors, applicant for a position at myInterview, or any prospective partner or investor, User or Candidate who visits or otherwise interacts with any of our websites, mobile application, online ads, and content, emails or other communications under our control ("**Sites**"); and
4. **Communication Data** in relation to our Services.

Specifically, this Privacy Policy describes our practices regarding –

1. [Data Collection](#)
2. [Data Uses](#)
3. [Data Location & Retention](#)
4. [Data Sharing](#)
5. [Cookies & Tracking Technologies](#)
6. [Communications](#)
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**If you are our User, Candidate, visitor, partner, investor or prospect ("you") - please read this Privacy Policy carefully and make sure that you fully understand and agree to it.**

You are not legally required to provide us with any personal data, and may do so (or avoid doing so) at your own discretion. If you do not wish to provide us with your personal data, or to have it processed by us or any of our Service Providers (defined in Section 4) as described below, please refrain from accessing, using or registering for our Services. If you are a User using the Services on behalf of a Customer, we suggest that you contact the User's account administrator with any questions about the Service. You should also let your account administrator know if you do not want to be registered to the Services.

### 1. Data Collection

- (i) **User Data:** Our Services enable Users to create a job listing and review Candidates' suitability to the job by receiving information, evaluating the interactions of the Candidate

with the Services, and gaining insights and inferences based on the above information. myInterview collects the following types of personal data relating to such Users -

- **User Profile Information** - full name, job title, profession, contact information such as mobile phone number and email address, demographic information such as location, post code, preferences and interests, profile picture and any content included in an organization video presentation a User might upload to the Services;
  - **Usage Information** - connectivity, technical and aggregated usage data and activity logs, log-in and log-out time, IP addresses, device and mobile app data (such as type, OS, device ID, app version, browser version, locale, time-zone and language settings used), session recordings and analytics, and the cookies and pixels installed or utilized on the device;
  - **Recruitment Process Data** - personal data collected or created by the Services by interactions between the User, the Candidate(s) and the Services;
- (ii) **Candidate Data:** We collect certain personal data on Candidates who use our Services as a part of their candidacy process. Our Services also create personal data based on the evaluation of Candidates and information provided to us by Users. When using the Services as a Candidate, we collect and create the following types of personal data-
- **Candidate Profile Information** - we collect full name and contact information, such as email address and mobile phone number, and the job listing to which the Candidate has applied;
  - **CV Data** - we may collect Candidate's resume and any personal data contained therein;
  - **Video Data** - we may collect video of the Candidate who participates in a video-based interview, video-based questionnaire, or when he or her uploads an intro video introducing themselves to the User/Customer/recruiter who created the job through the Services. In addition to the video footage, we may also collect images and transcripts we derive from such video;
  - **Recruitment Process Data** – personal data collected or created by the Services by interactions between the User, the Candidate(s) and the Services, including evaluations, scores and ratings assigned to Candidates by the Services and/or the Users;
- (iii) **Website Visitor, CRM & Prospect Data:** We collect the following types of personal data concerning our website visitors, Users, Candidates, partners, investors and prospects–
- **Usage Information** - connectivity, technical and aggregated usage data, such as User agent, IP addresses, device data (like type, OS, device ID, browser version, locale and language settings used), activity logs, session recordings, and the cookies and pixels installed or utilized on our Sites and/or their device;
  - **Business Account Information** - contact, contractual and billing details concerning our Users, which may also contain the details of their internal focal persons who directly engaged with us on behalf of the Customer, e.g., the account administrators, billing contacts and authorized signatories on behalf of the Customer; as well as details concerning their needs and preferences, as identified by us or recognized through our engagement with them;
  - **Information Concerning Our Prospects** - contact and business details, our communications with such prospects (correspondences, call and video recordings, call transcripts, and analyses thereof), as well as any needs, preferences, attributes and insights relevant to our potential engagement;
- (iv) **Communications Data (with Users, Candidates, prospects etc.):** We collect direct interactions and communications with us (including recordings and transcripts of your calls, emails, form submissions and chats with us, e.g., for customer service, user enablement, feedback, support and training purposes or otherwise through [LinkedIn](#), [Facebook](#) or [Twitter](#)).

We collect the personal data mentioned above either directly, through your interaction with us or with our Sites or Services; or through third-party services, social media, analytics tools, events we organize or participate in, and other business initiatives.

To the extent that any of the above-mentioned data only pertains to a non-human entity (e.g., the phone number or bank account of a company or business), we will not regard it as “personal data” and this Privacy Policy does not apply to it.

## 2. Data Uses

We use personal data as necessary for the facilitation and performance of our Services; to comply with our legal and contractual obligations; and to support our legitimate interests in maintaining and improving our Services; providing customer service and technical support; and protecting and securing our Users, Candidates, partners, investors, ourselves, and our Services.

If you reside or are using the Services in a territory governed by privacy laws under which consent is the only or most appropriate legal basis for the processing of personal data (in general, or specifically with respect to the types of personal data you expect or elect to process or have processed by, or via the Services, e.g. ‘special categories’ under the GDPR), providing such personal data and using the Services, as well as your acceptance of our [Terms and Conditions](#) and this Privacy Policy will be deemed as your consent to the processing of your personal data for all purposes detailed in this Policy. If you wish to revoke such consent, please contact us at [privacy@myinterview.com](mailto:privacy@myinterview.com).

Generally, we use personal data as processors, which means that we will use it on behalf of our Customer and in order to provide them with our Services. When we use personal data as processors, the processing of such data is also governed by the agreement we have with our Customers, partners, or investors. However, we use certain personal data, such as User Profile Information, Video Data and the Website Visitor, CRM & Prospect Data as a data controller, which means that we will use such personal data for our own purposes, such as improving and enhancing our platform and Services. Additional information about the roles we take when processing personal data can be found in Section 9 below. Specifically, we use personal data for the following purposes:

- a) To facilitate, operate, and provide our platform and services;
- b) To authenticate the identity of our Users and Candidates, and to allow them to access and use our Services;
- c) To provide assistance and support to our Users and Candidates;
- d) To share your data with our Service Providers (as defined in Section 4);
- e) To gain a better understanding on how you use and interact with our Services, and how we can improve the user experience for you and others, and continue improving our products, offerings and the overall performance of our Services;
- f) To contact you with general or personalized service-related messages, as well as promotional messages that may be of specific interest to you (as further described in Section 6 below);
- g) To facilitate, sponsor and offer events;
- h) To support and enhance our data security measures, including for the purposes of preventing and mitigating the risks of fraud, error or any illegal or prohibited activity;
- i) To create aggregated statistical data, inferred non-personal data or anonymized or pseudonymized data (rendered non-personal), which we or our business partners may use to provide and improve our respective services, or for any other purpose; and
- j) To comply with applicable laws and regulations.

**We do not sell your personal information, including though not solely as defined under the California Consumer Privacy Act (CCPA).**

## 3. Data Location & Retention

**Data Location:** Given the fact that myInterview operates in many jurisdictions worldwide, your personal data may be maintained, processed and stored by us and our authorized Service Providers (defined below) in multiple locations, including in the United Kingdom, the United States, within the

European Union, Australia, Israel, and other jurisdictions, as reasonably necessary for the proper performance and delivery of our Services, or as may be required by law.

While privacy laws may vary between jurisdictions, myInterview and its Service Providers are each committed to protect personal data in accordance with this Privacy Policy, reasonable and customary industry standards, and such appropriate lawful mechanisms and contractual terms requiring adequate data protection, regardless of any lesser legal requirements that may apply in the jurisdiction to which such data is transferred. For data transfers from the EU or the UK we have entered into Standard Contractual Clauses. You can obtain a copy by contacting us as indicated in Section 10 below.

**Data Retention:** We will retain your personal data for as long as it is reasonably necessary for us to maintain and broaden our relationship with you, and provide you with our Services and offerings; in order to comply with our legal and contractual obligations; and to protect ourselves from any potential disputes; as required by laws applicable to our operations, and in order to have proof and evidence concerning our relationship, should any legal issues arise following your discontinuance of use, all in accordance with our contractual terms and data retention policy.

Please note that except as required by applicable law or our specific agreements with you, we will not be obligated to retain your personal data for any particular period, and we are free to securely delete it, anonymize it, or restrict access to it for any reason and at any time, with or without notice to you. If you have any questions about our data retention policy, please contact us by e-mail at [privacy@myinterview.com](mailto:privacy@myinterview.com).

## 4. Data Sharing

**Legal Compliance:** In exceptional circumstances, we may disclose or allow government and law enforcement officials access to your personal data, in response to a subpoena, search warrant or court order (or similar requirement) and where such disclosure is necessary to comply with applicable laws and regulations. Such disclosure or access may occur if we believe in good faith that: (a) we are legally compelled to do so; (b) disclosure is appropriate in connection with efforts to investigate, prevent, or take action regarding actual or suspected illegal activity, fraud, or other wrongdoing; or (c) such disclosure is required to protect the security or integrity of our Services.

**Service Providers:** We engage selected third-party companies and individuals to perform services complementary to our own. Such Service Providers may provide hosting and server co-location services, communications and content delivery networks (CDNs), billing and payment processing services, data and cyber security services, fraud detection and prevention services, web and mobile analytics, e-mail, text messages and web/mobile notification distribution, monitoring and analytics services, data optimization and marketing services, social and advertising networks, content providers, e-mail, voicemails, support and customer relation management systems, call and session recording services, and our legal, financial and compliance advisors (collectively, "**Service Providers**").

These Service Providers may have access to your personal data, depending on each of their specific roles and purposes in facilitating and enhancing our Services, and may only use it for such limited purposes as determined in our agreements with them. Should you decide to directly engage with any of myInterview's Service Providers, please note that such engagement is beyond the scope of the terms applicable to your engagement with myInterview, including this Privacy Policy, and will therefore be covered by the Service Provider's terms and policies.

Our Service Providers shall be deemed as 'processors' in circumstances where myInterview assumes the role of 'controller'; and where myInterview acts as the 'processor', the Service Provider shall be deemed our 'sub-processor', as further described in Section 9 below.

**Third Party Websites and Services:** Our Services may also include links to third-party websites, and integrations with third party services. Such websites and third-party services, and any information you process, submit, transmit or otherwise use with such websites and third-party services, are governed by such third party's terms and privacy practices and policies, and not by this Privacy Policy. We encourage you to carefully read the terms and privacy policies of such website and third-party services.

**Sharing data between Users and Candidates:** In order to provide our Services, we also share certain details about Users and Candidates with each other. This is required to connect between Users and Candidates based on job applications, preferences, location, profession, roles, work experience, or other parameters.

**Sharing of data between Users from the same Customer:** In order to provide our Services, Users relating to the same Customer may elect to share personal data pertaining to Candidates with each other. This is required to assist in the recruitment process.

**Protecting Rights and Safety:** We may share your personal data with others if we believe in good faith that this will help protect the rights, property, or personal safety of myInterview, any of our Users, partners or Candidates, or any members of the general public.

**myInterview Subsidiaries and Affiliated Companies:** We may share personal data internally within our group of companies, for the purposes described in this Privacy Policy. In addition, should myInterview or any of its subsidiaries or affiliates undergo any change in control or ownership, including by means of merger, acquisition or purchase of substantially all or part of its assets, your personal data may be shared with the parties involved in such an event. 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 via e-mail or prominent notice on our Services.

For the avoidance of doubt, myInterview may share your personal data in additional manners, pursuant to your explicit approval, or if we are legally obligated to do so, or if we have rendered such data non-personal and/or anonymous. We may transfer, share or otherwise use non-personal data at our sole discretion and without the need for further approval.

## 5. Cookies & Tracking Technologies

Cookies are packets of information sent to your web browser and then sent back by the browser each time it accesses the server that sent the cookie. Some cookies are removed when you close your browser session. These are the "Session Cookies." Some last for longer periods and called "Persistent Cookies." We use both types.

We use Persistent Cookies to remember your log-in details and make it easier for you to log-in the next time you access the Services. We may use this type of cookies and Session Cookies for additional purposes, to facilitate the use of the Services' features and tools.

Every browser allows you to manage your cookies preferences. Please bear in mind that disabling cookies may complicate or even prevent you from using certain parts of features of the Services. However, the use of cookies may be subject to additional rules including your consent, as further explained in our [Cookie Policy](#).

Please note that if you get a new computer or device, install a new browser, erase or otherwise alter your browser's cookie file (including upgrading certain browsers), you may also clear the opt-out cookies installed once you opt-out, so an additional opt-out will be necessary to prevent additional tracking.

## 6. Communications

**Service Communications:** We may send you notifications (through any of the means available to us, including by email, SMS or through our platform) of changes or updates to our Services, billing issues, service changes, etc. However, please note that you will not be able to opt-out of receiving certain service communications which are integral to the operation of our Services and your use thereof (like customer support communications).

**Promotional Communications:** We may also notify you about new features, additional offerings, better ways to use the Services, events and special opportunities or any other information we think you will find valuable. We may provide such notices through any of the contact means available to us (e.g., phone, SMS, mobile notifications or e-mail), through the Services, or through our marketing campaigns on any other sites or platforms.

If you do not wish to receive such promotional communications, you may notify myInterview at any time by contacting us at [privacy@myinterview.com](mailto:privacy@myinterview.com), or by following the “unsubscribe”, “stop”, “opt-out” or “change e-mail preferences” instructions contained in the promotional communications you receive.

## 7. Data Security

We and our hosting services implement systems, applications and procedures to secure your personal data, and to reduce the risks of theft, damage, loss of data, or unauthorized access or use of personal data. These measures are aimed to provide sound industry standard security. However, although we make efforts to protect your privacy, we cannot guarantee that the Services will be immune from any wrongdoings, malfunctions, unlawful interceptions or access, or other kinds of abuse and misuse.

## 8. Data Subject Rights

If you wish to exercise your rights under any applicable law, such as the EU General Data Protection Regulation (GDPR), the Australian Privacy Act 1988, or the California Consumer Privacy Act (CCPA), to request access to, and rectification or erasure of your personal data held with myInterview, or to restrict or object to such personal data’s processing, or to port such personal data or to exercise the right to equal services and prices (each to the extent available to you under the laws which apply to you), please contact us at [privacy@myinterview.com](mailto:privacy@myinterview.com). If you are a GDPR-protected individual, you also have the right to lodge a complaint with the relevant supervisory authority in the territory applicable to you.

When you ask us to exercise any of your rights under this policy or 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 to provide further information to better understand the nature and scope of the data to which your request pertains. Such additional information will be then retained by us for legal purposes (e.g., as proof of the identity of the person submitting the request), in accordance with Section 3 above.

We may redact from the data which we will make available to you, any personal data or confidential information related to others.

## 9. Controller/Processor

Certain data protection laws and regulations, such as the GDPR or the CCPA, typically distinguish between two main roles for parties processing personal data: the “controller” (or the “business” under the CCPA), which determines the purposes and means of processing; and the “data processor” (or the “service provider” under the CCPA), which processes the data on behalf of the controller. Below we explain how these roles apply to our Services, to the extent that such laws and regulations apply.

**myInterview is the “data controller” of User Profile Information, Usage Information (whether related to Users, Candidates, Visitors, investors, partners, and prospects), Video Data, CV Data, Candidate Profile Information, Website Visitor, CRM & Prospect Data (i.e., the relevant Usage Information, Business Account Information, and Information Concerning our Prospects), Communications Data, and other personal data pertaining to our investors, visitors, and prospects, and assumes the responsibilities of a controller (solely to the extent applicable under the law), as set forth in this Privacy Policy. In such instances, our Service Providers processing such data will assume the role of “processor”.**

**myInterview is the “data processor” of Recruitment Process Data, whether related to a User or Candidate.** In such instances, our Customers shall be deemed the “data controller” of such data, and myInterview will process such data on the Customers’ behalf, as its “data processor”, in accordance with its reasonable instructions, and the commercial and data processing agreements executed between MyInterview and such Users (as applicable). myInterview’s Service Providers shall then act as designated sub-processors in these instances. myInterview’s Customers will be responsible for

meeting any legal requirements applicable to controllers (such as obtaining their consent or establishing other legal basis for processing).

## 10. Additional Notices & Contact Details

**Updates and Amendments:** We may update and amend this Privacy Policy from time to time by posting an amended version on our applicable platforms. The amended version will be effective as of the date it is published. We will provide a 10-day prior notice if we believe any substantial changes are involved via any of the communication means available to us or via the Services. After such notice period, all amendments shall be deemed accepted by you.

**External Links:** While our Services may contain links to other websites or services, we are not responsible for their privacy practices. We encourage you to pay attention when you leave our Services for the website or application of such third parties, and to read the privacy policies of each and every website and service you visit. This Privacy Policy applies only to myInterview's Services.

**Our Services are not designed to attract children under the age of 16:** We do not knowingly collect personal data from children and do not wish to do so. If we learn that a person under the age of 16 is using the Services, we will attempt to prohibit and block such use and will make our best efforts to promptly delete any personal data stored with us with regard to such child. If you believe that we might have any such data, please contact us by e-mail at [privacy@myinterview.com](mailto:privacy@myinterview.com).

### EU / UK Representative:

We value your privacy and your rights as a data subject and have therefore appointed Prighter as our privacy representative and your point of contact.

Prighter gives you an easy way to exercise your privacy-related rights (e.g. requests to access or erase personal data). If you want to contact us via our representative Prighter or make use of your data subject rights, please visit: [prighter.com/q/15412404249](https://prighter.com/q/15412404249) by post as follows:

#### EU enquiries may be sent to:

Schellinggasse 3/10  
1010 Vienna  
Austria

#### UK enquiries may be sent to:

20 Mortlake High Street  
London, SW14 8JN  
UNITED KINGDOM

If you are a GDPR-protected individual, you also have the right to lodge a complaint with the relevant supervisory authority in the EU or in the UK as applicable to you.

**Questions, concerns or complaints:** If you have any comments or questions regarding our Privacy Policy, or if you have any concerns regarding your personal data held with us, please contact us at: [privacy@myinterview.com](mailto:privacy@myinterview.com).

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