

# **AU10TIX – CANDIDATES PRIVACY NOTICE**

Last updated: July, 2024

## **ABOUT THIS NOTICE**

We, at Au10tix (collectively: “**Au10tix**”, “**we**”, “**us**”, “**our**”), put great efforts into making sure that we secure Personal Information related to you and use it properly. This Notice explains our privacy practices and how we handle Personal Information related to you when you apply for a job with Au10tix. Specifically, this notice (“**Notice**”) will provide details about:

- ✓ What Personal Information job applicants (“**Candidates**”) are required to submit;
- ✓ What we do with such Personal Information and how we process it; and
- ✓ The rights that you, as a Candidate, have in connection with the Personal Information and job application materials submitted by you during the job application and recruitment process, as applicable in your jurisdiction.

“**Personal Information**” means any information relating to an identified or identifiable natural person.

Please take the time to read this Notice, and do not hesitate to contact us if you have any questions about the job application and recruitment process, your privacy rights, or this Notice in general. You can contact us at: [DPO@au10tix.com](mailto:DPO@au10tix.com)

In case that you visit, or apply for a career through, our website, please also read our Website Privacy Policy [Privacy Notice - AU10TIX](#), which contains information on how we process Personal Information through our website, and supplements this Notice.

### **IMPORTANT NOTE**

If you are a resident of the state of California, please read the Privacy Notice for California Residents.

## **PURPOSES FOR COLLECTING AND PROCESSING PERSONAL INFORMATION RELATED TO YOU**

We collect Personal Information related to you for recruiting purposes so that we could assess your candidacy and suitability for a job with Au10tix (whether it is the position that you applied for, or other vacant positions), to contact you during the job application and recruitment process and to offer you an employment contract if we decide to hire you.

We will also use Personal Information related to you for Au10tix’s human resources’ management, including:

- ✓ For Au10tix’s HR record keeping purposes;
- ✓ To comply with diversity, inclusion and other legal requirements, and to protect Au10tix’s legal rights;
- ✓ To combine Personal Information related to you with information such as criminal background checks (where permitted by law) that Au10tix receives from third party service providers; and

- ✓ When Au10tix believes in good-faith that using Personal Information related to you is necessary to protect the life, health, safety or other vital interest of Au10tix or any other person.
- ✓ To take steps to enter into an employment contract with you.

We may also use Personal Information for compliance with legal obligations such as complying with immigration and employment laws and regulations, as well as in the event of a legal dispute between you (and/or a party on your behalf) to us (and/or a party on our behalf), in connection with handling such dispute.

## **PERSONAL INFORMATION THAT WE COLLECT**

When you apply for a job at Au10tix, we will ask you to provide certain Personal Information that will help us evaluate your qualifications and candidacy and to stay in touch with you during the job application and recruitment process. Where permitted by law, we will collect the following information:

- ✓ Personal information connected to the identification of a Candidate such as: first name and surname;
- ✓ Contact information such as: phone number and email address;
- ✓ Eligibility information such as: resume/CV, cover letter, employment history (employers, job titles, length of employment) and educational background and training, linguistic capabilities, job skills, personal interests and your portfolio if relevant;
- ✓ Verification and background information and documents such as: diplomas and certificates;
- ✓ Reference materials and documents such as: job references and letters of recommendation, job salary/payment history, military records (if permitted by law), titles and licenses, immigration visa status and security clearance;
- ✓ Social media information such as your LinkedIn profile;
- ✓ Information that you provide us about your work and personality traits such as answers during an interview, answers to essay questions, or information about your salary expectations and work preferences;

## **HOW WE COLLECT PERSONAL INFORMATION RELATED TO YOU?**

- ✓ We collect Personal Information from you when you apply for a job position. Note that you are not legally obliged to provide Personal Information to us and any such provision of Personal Information is subject to your own free will.
- ✓ Third party recruiting firms and websites such as LinkedIn and HR agencies.
- ✓ Individuals who refer you.

## **LEGAL BASIS FOR PROCESSING PERSONAL INFORMATION RELATED TO YOU**

If you are in a jurisdiction that requires a legal basis for processing Personal Information related to you, then our legal basis for processing Personal Information that we collect and process about you is:

- ✓ Your consent.

- ✓ We further process Personal Information related to you, where it is necessary to comply with legal obligations such as immigration and employment laws, regulations, and legal proceedings.
- ✓ Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests. Such legitimate interests may be, for example, recruitment of personnel, handling career applications or other ongoing HR purposes.

## **SHARING PERSONAL INFORMATION RELATED TO YOU**

We will share Personal Information related to you in the following instances:

- ✓ With any of our affiliate entities to facilitate your application and the job recruitment process. We will share Personal Information related to you only to the extent necessary for the purposes of the job application and recruitment process and we will do so in accordance with this Notice.
- ✓ With third party service providers that provide business functions or services to Au10tix (for example, data storage providers and third party recruiting firms).
- ✓ With your previous or current employer, or other references provided by you, to learn about your employment history.
- ✓ With a competent supervisory authority, if we believe doing so is in accordance or otherwise required by applicable laws, regulations, judicial or legal processes.
- ✓ With law enforcement or other authorities (including immigration, health, tax, national security) when it is necessary to protect the interests of our company or individuals.
- ✓ With other entities when it is required as part of a merger, acquisition, or assignment of part or all of our business with those entities.
- ✓ Professional advisors (e.g. lawyers, accountants), to the extent necessary for the provision of their services to us.
- ✓ With any other third party as long as you have given your consent to such disclosure.

## **YOUR CHOICE**

Applying for a job and submitting your job candidacy materials is voluntary and at any time you can contact us and request that we stop considering your application.

## **YOUR RIGHTS REGARDING PERSONAL INFORMATION RELATED TO YOU**

You have a number of rights in relation to Personal Information we collected as part of your recruiting process. These can differ by country and are typically subject to important exceptions, but, where they apply, they can be summarized in broad terms as follows:

### **Right of access**

If you are entitled to exercise the rights of access, you can contact us at: [au10tix\\_hr@au10tix.com](mailto:au10tix_hr@au10tix.com) and request to access the Personal Information that we keep about you.

We will ask you to provide us with certain credentials to make sure that you are who you claim to be and will make good-faith efforts to locate Personal Information related to you that you request to access.

In responding to your request, we will apply limitations available under applicable law, for example, to protect our trade secrets, confidential information, and to protect the privacy of others.

### **Right to rectification**

In limited circumstances, you may have the right to rectify, for example, inaccurate or incomplete personal Information concerning you.

### **Right to erasure**

You may have the right to ask us to erase certain personal Information concerning you according to the applicable law.

If you request to correct or delete personal Information related to you, please note that we will still need to retain certain information for record-keeping purposes or to comply with legal or contractual requirements. In responding to your request, we will apply limitations available under applicable law, for example, to protect our trade secrets, confidential information and to protect the privacy of others.

## **RETENTION OF PERSONAL INFORMATION RELATED TO YOU**

We store Personal Information for as long as necessary to fulfill the purposes of using such Personal Information and as permitted by law.

To determine the appropriate retention period for Personal Information, we consider the following criteria: the volume, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorized use or disclosure of Personal Information, the purposes for which we collect and process Personal Information, the timeframe during which we may require such Personal Information in connection with potential litigation, and applicable legal requirements.

## **TRANSFER OF PERSONAL INFORMATION RELATED TO YOU OUTSIDE YOUR TERRITORY**

We are an Israeli-based company. However, we transfer Personal Information related to you outside of its territory of origin to the following territories: Israel and US.

We take the necessary and appropriate safeguards to ensure a lawful transfer, including conducting required impact assessments, engaging under applicable statutory transfer agreements, etc.

Before such transfer, we will assess risks involved with the transfer, enter into relevant information transfer agreements, adhere to applicable security and confidentiality requirements, or take such other measures to lawfully transfer the Personal Information.

If relevant law permits us to transfer Personal Information related to you based on your consent to such transfer, please be aware that reviewing this Notice is deemed as an acknowledgment of this potential transfer. We respect your choice and appreciate your understanding.

If Regulation (EU) 2016/679 ("GDPR") applies to our processing of Employee Data related to you, you also have the right to request a copy of the applicable transfer safeguard used to lawfully transfer the data.

## HOW DO WE SECURE PERSONAL INFORMATION?

We and our hosting service providers implement systems, applications, measures, safeguards, and procedures designed to secure Personal Information and minimize the risks of theft, damage, loss of information, or unauthorized access or use of Personal Information.

These measures provide sound industry-standard security. However, although we make substantial efforts to protect your privacy, we cannot guarantee that Personal Information will be immune from any wrongdoings, malfunctions, unlawful interceptions or access, or other kinds of abuse and misuse.

## OUR PROCESSING OF PERSONAL INFORMATION UNDER SPECIFIC LAWS

### Processing Under EU/UK Data Protection Laws

If “**EU Data Protection Laws**”, such as Regulation (EU) 2016/679 (GDPR) and Directive 2002/58/EC (ePrivacy Directive) apply to the processing of Personal Information related to you by Us, then the following terms apply in addition to the general terms of this Notice.

In this chapter, “**Personal Information**” includes personal data, as defined under EU Data Protection Laws.

### Lawful Grounds for Processing

Our legal basis for processing Personal Information collected about you in the EEA and/or the UK is based on the following:

- Processing Personal Information related to you is a legitimate interest of Au10tix as it is necessary for us to fulfill our hiring and employment needs, evaluate the qualifications and backgrounds of Candidates, and communicate with you throughout the recruitment process. Therefore, we will rely on our legitimate interests, which we believe are not overridden by your fundamental rights and freedoms, for the following purposes:
  - Communications with you, where you make contact with us through our website and other digital assets;
  - Recruitment of personnel, handling career applications or other ongoing HR purposes;
- Processing Personal Information related to you is necessary for our compliance with legal obligations such as complying with immigration and employment laws and regulations.
- Processing Personal Information related to you is necessary in order to take steps at your request prior to entering into an employment contract with you.
- All processing of Personal Information related to you which are not based on the lawful grounds indicated above, are based on your consent. If we process Personal Information related to you based on your consent, you can withdraw your consent at any time, however, this may have an effect on our ability to consider your job application. Withdrawing consent will not affect the lawfulness of any processing we conducted prior to the withdrawal and will have no effect on the mandatory processing of your information under applicable laws.

## YOUR RIGHTS UNDER EU DATA PROTECTION LAWS

You have the additional following rights subject to the exceptions under any applicable law:

- **Right of Access and Rectification** – You are entitled to access the Personal Information that we keep about you together with information about how and on what basis the Personal Information is being processed and to rectify when such information is inaccurate. If you find that the Personal Information related to you is not accurate, complete or updated, then please provide us the necessary information to correct it.
- **Right to Erasure** – You have the right to request that we erase some or all of the Personal Information related to you. If no exemption applies, and we need to delete Personal Information related to you following your request, it can take time until we completely delete residual copies of Personal Information related to you from our active servers and from our backup systems.
- **Right to Restriction of Processing** – You have the right to request that we restrict, or limit the processing of Personal Information related to you.
- **Right to Object** – You have the right to object to our processing of Personal Information related to you.
- **Right to Data Portability** – You have the right to receive or to have Personal Information related to you transmitted to another data controller.
- **Right not to be Subject to a Decision Based Solely on Automated Processing** – Our decision whether to hire you or not is made by our relevant manager.
- **Right to File a Complaint** - You have a right to lodge a complaint with a data protection supervisory authority of your habitual residence, place of work or of an alleged infringement of the General Data Protection Regulation (EU) 2016/679 (“GDPR”) and/or UK GDPR.

We will look into your query and make good-faith efforts to resolve any existing or potential dispute with you. Note that when you send us a request to exercise your rights, we will need to reasonably authenticate your identity and location. We will ask you to provide us with credentials to make sure that you are who you claim to be and will further ask your questions to understand the nature and scope of your request.

Please contact us if you wish to make a request to exercise your rights or if you have a question about your rights at: [au10tix\\_hr@au10tix.com](mailto:au10tix_hr@au10tix.com).

If you would like further additional information about your rights in association with Personal Information related to you or if you believe that we are misusing or have misused Personal Information related to you, please contact your local data protection authority. Here is a link to the contact details of EU data protection authorities: [http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm) and a link to the contact details of the UK Information Commissioner’s Office: <https://ico.org.uk/global/contact-us/>.

## **Accessibility**

If you have a disability and would like to access this Notice in an alternative format, please contact us via our contact details listed below.

## **How do We Change this Notice?**

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

## Contact Us

If you have any questions about this Notice or have any concerns about how we handle Personal Information related to you, please contact us at: [au10tix\\_hr@au10tix.com](mailto:au10tix_hr@au10tix.com) or [DPO@au10tix.com](mailto:DPO@au10tix.com).

# **ANNEX 1 – PROCESSING PERSONAL INFORMATION UNDER US CONSUMER PRIVACY LAWS**

## SCOPE

If you are a California resident, the following terms also apply to our processing of Personal Information related to you, as defined under the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act (“CCPA”), and other currently in effect and applicable U.S. Consumer Privacy Laws (“US Privacy Laws”) This notice does not apply to our handling of publicly available information from government records, de-identified or aggregated information or other information that is excluded from the CCPA’s scope. The terms “Personal Information” and “Sensitive Personal Information” shall have the meaning ascribed to it under the CCPA.

In case that you visit, or apply for a career through, our website, please also read our Privacy Notice for California Residents on our website [Privacy Notice - AU10TIX](#), which contains information on how we process Personal Information through our website, and supplements this Notice.

We do not use, and will not disclose sensitive personal information, within the meaning of the US Privacy Laws, other than to:

- assess our potential engagement with you as an employee;
- prevent, detect, and investigate security incidents;
- resist malicious, deceptive, fraudulent, or illegal actions directed at us and to prosecute those responsible;
- ensure your, and others’ physical safety and wellbeing; or,

We do not use or disclose Employee Data for cross-context behavioral advertising.

## PERSONAL INFORMATION WE COLLECT, USE AND DISCLOSE

We may collect the categories of Personal Information listed in the table below. The table also lists, for each category, the source of the Personal Information, the business purposes for which it will be processed and the third parties to whom it may be disclosed.

Personal Information Category	Business Purposes	Source	Disclosure to third parties
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<p>Identifiers, such as name and email address.</p>	<ul style="list-style-type: none"> <li>• Enter into a contract or to perform a contract with you.</li> <li>• Respond to your requests or questions and to manage our relationship with you (“<b>Relationship Management and Response to Requests</b>”).</li> <li>• Assess your candidacy and suitability for a job with Au10tix (“<b>Assessment</b>”).</li> <li>• In the event of a legal dispute between you (and/or a party on your behalf) to us (and/or a party on our behalf), in connection with handling such dispute (“<b>Handling of Disputes</b>”).</li> <li>• Compliance with legal obligations such as immigration and employment laws and regulations and in legal proceedings. (“<b>Compliance Purposes</b>”).</li> </ul>	<ul style="list-style-type: none"> <li>• When you contact us (“<b>Direct Interactions</b>”).</li> <li>• Third party recruiting firms, websites such as LinkedIn and HR agencies or Individuals who refer you (“<b>Third Parties</b>”).</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliate entities (“<b>Affiliates</b>”).</li> <li>• Third party service providers that provide services to us in connection with the aforementioned business purposes, such as data storage providers and third party recruiting firms (“<b>Service Providers</b>”).</li> <li>• Your former or current employers (“<b>Employers</b>”).</li> <li>• Legal, regulatory and law enforcement authorities, to the extent required by applicable law (“<b>Authorities</b>”).</li> <li>• Professional advisors (e.g. lawyers, accountants), to the extent necessary for the provision of their services to us (“<b>Advisors</b>”).</li> <li>• Third parties to whom we may choose to sell, transfer, or merge our business (or parts thereof) or our assets, or parties whose business we wish to acquire (“<b>M&amp;A Counterparts</b>”).</li> </ul>
<p>Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), such as name, telephone number, and employment history.</p>	<ul style="list-style-type: none"> <li>• Enter into a contract or to perform a contract with you.</li> <li>• Relationship Management and Response to Requests.</li> <li>• Handling of Disputes.</li> <li>• Compliance Purposes.</li> </ul>	<ul style="list-style-type: none"> <li>• Direct Interactions.</li> <li>• Third parties</li> </ul>	<ul style="list-style-type: none"> <li>• Third parties to whom we may choose to sell, transfer, or merge our business (or parts thereof) or our assets, or parties whose business we wish to acquire (“<b>M&amp;A Counterparts</b>”).</li> </ul>
<p>Characteristics of protected classification under California or federal law, such as gender identity and military or veteran status. This information is considered as “Sensitive Personal</p>	<ul style="list-style-type: none"> <li>• Compliance Purposes.</li> </ul>	<ul style="list-style-type: none"> <li>• Direct Interactions.</li> <li>• Employers and publicly available sources.</li> </ul>	

Information.			
<b>Biometric information, such as photos and voice records, based on your interaction with us during the job application and the recruitment process.</b>	<ul style="list-style-type: none"> <li>• Enter into a contract or to perform a contract with you.</li> <li>• Handling of Disputes.</li> <li>• Compliance Purposes.</li> </ul>	<ul style="list-style-type: none"> <li>• Direct Interactions.</li> </ul>	
<b>Professional or employment related information, such as current or past employment history.</b>	<ul style="list-style-type: none"> <li>• Enter into a contract or to perform a contract with you.</li> <li>• Handling of Disputes.</li> <li>• Compliance Purposes.</li> <li>• Assessment</li> </ul>	<ul style="list-style-type: none"> <li>• Direct Interactions.</li> <li>• Employers and publicly available sources.</li> <li>• Third Parties</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Service Providers.</li> <li>• Authorities</li> <li>• Advisors.</li> <li>• M&amp;A Counterparts.</li> <li>• Employers</li> </ul>

The table above describes our current practices and our practices during the 12 months preceding the “Last Updated” date of this Notice.

If you provide us with any Personal Information relating to others, you must make sure that you have permission to do so.

**OPT-OUT OF THE SALE OR SHARING OF PERSONAL INFORMATION (“DO NOT SELL” / “DO NOT SHARE”)**

We do not sell Personal Information or share it with third parties for cross-context behavioral advertising and have not done so in the past 12 months.

We do not knowingly sell, or share with third parties for cross-context behavioral advertising, Personal Information of consumers under 16 years of age.

**DATA RETENTION**

We retain Personal Information related to you for as long as necessary to fulfill the purposes we collected it for, including for legal or reporting requirements.

In order to determine the appropriate retention period for Personal Information, we consider the following criteria: the volume, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorized use or disclosure of Personal Information, the purposes for which we collect and process Personal Information, the timeframe during which we may require such Personal Information in connection with potential litigation, and applicable legal requirements.

**YOUR CALIFORNIA PRIVACY RIGHTS UNDER CCPA/CPRA**

- **Right to Know and Data Portability:** you have the right to request certain information regarding our collection and use of Personal Information, and disclosure of Personal Information to third parties.

- **Right to Deletion and Rectification:** you have the right to request that we delete any of your Personal Information that we collected from you and retained or that we correct inaccurate Personal Information we retained. We shall use commercially reasonable efforts to correct such inaccurate Personal Information. We may deny your deletion request in certain defined cases, for example, if retaining the data is necessary for us or our service providers to perform our contract with you, detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, debug products, exercise free speech, engage in research, enable internal uses or comply with applicable laws and legal obligations.
- **Non-discrimination:** limiting the use of Personal Information may affect features and uses that rely on that data. You have a right not to receive discriminatory treatment by us for the exercise of such privacy rights as conferred by the CCPA. Unless permitted by the CCPA, we will not: deny you goods or services, provide you a different level or quality of goods or services or suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.
- **Automated decision-making:** you will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have notified you and allowed you to opt-out.

## **SUBMITTING REQUESTS REGARDING YOUR RIGHTS**

To make a request regarding your rights as detailed above, please submit a request using one of the methods in the Contact Details section below.

You may use a legally authorized person on your behalf to submit a request if you provide a signed written permission to such person. Your request to know or delete must provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative and should describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

California's "Shine the Light" law (Civil Code Section § 1798.83) permits Candidates who are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please contact us using one of the methods in the Contact Details section below.

## **ACCESSIBILITY**

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## **HOW DO WE CHANGE THIS NOTICE?**

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## **CONTACT US**

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