

PRIVACY POLICY

Last Updated: December 1, 2024

INTRODUCTION

This Privacy Policy describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.

When we refer to personalinvest.org website and services, "we", "our" or "us" we mean **the private limited company «PersonalInvest OÜ», (“company”, “we”)**, a company incorporated and registered in Estonia, the owner and provider of this Website and the Service.

Registered address: Katusepapi tn 6 11412 Lasnamäe linnaosa, Tallinn Harju maakond Estonia

Email address: elena@personalinvest.org

We are subject to applicable data protection legislation including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679) (the “GDPR”) and we are the data controller unless otherwise stated.

If you are a US resident (in particular California, Colorado, Connecticut, Montana, Nevada, Oregon, Texas, Utah, Virginia resident), please see our Notice for US Residents below for information regarding your rights.

If you are a resident of the European Union, United Kingdom, or EEA, you may have additional rights to access, delete and restrict use of your data, as described in this Privacy Policy.

This Privacy Policy applies in respect of the personal data of the following categories of people: Candidates, Recruiters, and Third-party service providers who handle personal data on behalf of the agency, People Whose Data We Receive/ Referees, Website Users.

If you have any questions, please contact us:

CEO elena@personalinvest.org

DPO amaurya@personalinvest.org

1. WHAT INFORMATION WE COLLECT ABOUT YOU AND ON WHAT LEGAL GROUND?

The processing of personal data must be done strictly in accordance with the purposes for which it was collected.

Generally, we process personal data in the following situations:

- to provide recruitment services to Candidates. Personal data is processed to match candidates with potential job opportunities and to facilitate the recruitment process.
- when you: (a) communicates to the Company any form, document, or information about its interactions and/or transactions with the Company, (b) uses or purchases the company's services, (c) concludes, executes, and finalizes a contract (including work or remote contracts) with the Company;

- when you interact with Company representatives, for example, by telephone, letters, fax, in-person or email meetings, to manage the business relationship with the organization from which you originate;
- when you ask to be contacted by Company, be included in an email or other mailing list or when the person responds to companies' request for the provision of Personal Data;
- we communicate with you through channels previously approved to keep updated on new vacancies;
- to analyze and improve our services and communications to the individuals, including conducting customer surveys on their satisfaction with companies' services;
- when you send any personal data or personal data of a third person (for example, information about family members, referees and etc.) for any reason;
- to comply with Companies' statutory obligations (such as, reporting obligations to tax authorities, archiving of documents and etc.);
- for the purpose of enforcing judgments and exercising and / or defending Companies' rights;
- for the purpose of monitoring and assessing compliance with Company policies and standards;
- for any purpose and / or ancillary to any of the above or for any other purpose for which your personal data has been provided to the Company in accordance with applicable law.

The types of data collected are specific to the needs and purposes related to each group.

CANDIDATES

Candidates include individuals with whom we have not had prior contact but whom we reasonably consider would be interested in or might benefit from our services and from being considered for any roles advertised or promoted by us. Candidates also include applicants for such roles, as well as people who have submitted a speculative CV to us not in relation to a specific job, and/or who have engaged with us about services and/or any roles advertised or promoted by the Company.

Depending on the relevant circumstances and applicable local laws and requirements, we will collect some or all of the information listed below:

- Identification Information: name, date of birth;
- Contact Information: location, phone number, and email address;
- Professional Information: CV/resume, work experience, education, skills, and qualifications and languages spoken;
- References: contact details of references provided by the candidate;
- Application Information: cover letter, application forms, and interview notes;
- Background Checks: verification of qualifications, recommendations from previous employers;
- Digital Presence: Social media profiles and professional network profiles (e.g., LinkedIn);
- Citizenship and Legalization Status;
- Start date or availability date;

- Information on Candidates interests and needs regarding future employment, both collected directly and inferred, for example from jobs viewed or articles read on our website or from links clicked on in emails from us;
- In certain circumstances, video recordings of Candidates participating in the interviews where individuals have consented to the recording.
- Any other information you provide during the recruitment process.

We collect Candidate personal data in the following ways:

- Personal data that the Candidate give to us;
- Personal data that we receive from other sources; and
- Personal data that we collect automatically.

Depending on the relevant circumstances and applicable local laws and requirements, receiving information from other sources may include:

- when we search for Candidates via third party sources, such as LinkedIn and other job sites (according their ToU and Privacy Policy), from which we obtain their personal information and/or when we carry out other pre-recruitment;
- Candidates' referees may disclose personal information about them;
- interaction with the Company on any social media platform on which we have a presence.

Our recruitment process is divided into several steps that start from the moment we define our job offer and end when the Candidate's application is accepted or declined. These steps correspond to the various purposes described below. We generally use Candidate data in Pre-recruitment Activities, Recruitment Activities, Marketing Activities and Analytics, and to help us establish, exercise, or defend legal claims.

Pre-recruitment Activities mean identifying candidates for a job offering. The sourcing process typically involves building a list of potential candidates' names (called name generation) and finding contact information for each person. This can involve the use of internal and external platforms (our database, social networks, etc.) to find suitable candidates for open positions. The processing of personal information depending on the type of information and service concerned is based in anticipation of a prospective contract or our legitimate interest in sourcing an interesting profile linked to our job offer (where applicable).

Recruitment Activities mean the process of reviewing job applications. This comes in right after candidate sourcing and involves skimming through Candidates' resumes and cover letters to find the closest applicant-job-description matches keeping in mind qualifications, experience, skill sets, and projected candidate-organization fit. The processing of personal information is based on the performance of a contract or in anticipation of a prospective contract (where applicable) or our legitimate interest to verify the candidate's qualifications required for the open position (where applicable and if compliant with the laws of candidates' country) and consent of the Candidate when we use tools and technologies to assess their suitability for a job and measure professional aptitudes: tests of personality, video interviews, etc.

We process Candidates' personal information for administering, managing and maintaining candidate profile in our database if Candidate once have requested us to create it on the basis of the performance of a contract or our legitimate interest in managing of our database (where applicable and such legitimate interest is not overridden by Data subjects' own interests).

In appropriate circumstances, we also use Candidate data for marketing and profiling purposes on the basis of explicit opt-in consent.

We may process sensitive personal data and share it with Customers only with explicit consent and where this is contractually required or the Customer specifically requests such information to enable them to comply with their own employment processes.

CUSTOMERS

For companies and agencies partnering with us, as the Customers, we collect data including:

- Company Details (company's name, contact information, and business identification numbers);
- Employee Information or Representative Data (information of employees who interact with our services, such as names, roles, and contact details);
- Transactional Data (records of transactions and interactions with our services, including payment information and service usage data);
- Contract Information (details pertaining to agreements, contracts, and interactions between the company and our service).

The data we collect about Customers are needed to ensure that we can reach out about our services, our relationship runs smoothly and in certain circumstances, to develop, improve and provide services, for communications, marketing, analytics, security, legal, compliance and regulatory obligations. We process it on the basis of contract with us and legitimate interest (Article 6 (1) (b), (f) GDPR).

We may collect photo and business contact details of Customers' employees and representatives with their consent for advertising and marketing purposes. We collect this data with their consent and delete it after the end of the specific campaign plus a reasonable period for follow-up analysis or for ongoing marketing purposes the retention period will be up to 3 years with periodically reviewed data, and the individuals have not withdrawn their consent.

We collect Customer personal data in the following ways:

- Personal data that we receive from Customer;
- Personal data that we collect or receive from other sources; and
- Personal data that we collect automatically.

Where appropriate and in accordance with any local laws and requirements, we will seek more information about Customers from other sources generally by way of market research and analyzing online and offline media.

PEOPLE WHOSE DATA WE RECEIVE / REFEREES

Personal information that we collect, hold, use and disclose about Referees is typically used for:

- Confirming identity and authority to provide references;
- Assessing candidate suitability;
- Performing recruitment functions.

We may collect such information in the course of our checking Candidates' references and whilst speaking to candidates about potential referees.

We may also collect personal information from a range of publicly available sources including newspapers, journals, directories, the Internet and social media sites and we will manage such information in accordance with our Privacy Policy.

WEB SITES USERS

When you visit our website or interact with the emails we send you, we automatically collect certain information. This includes details about your browser and device, such as the type and version of your browser, operating system, device type (desktop, tablet, smartphone, etc.), and display settings. We also gather your IP address and approximate geolocation based on the IP address, as well as the time and duration of your visit. We track the pages you view, the sequence of pages, and the actions you take, such as clicking on links, filling out forms. We use cookies and similar technologies to store unique identifiers and session data on your device. Additionally, we collect information about the referring URL (the page you came from) and your interactions with our site elements, such as button clicks and page scrolls, as well as your engagement with multimedia content like video and audio. Regarding emails, we track whether you open them, the time of opening, and any clicks on links within the emails, often using pixel tags to monitor these interactions. This data is collected to enhance user experience, analyze user behavior, conduct marketing research, personalize content and advertising, and ensure security and fraud prevention. This data does not personally identify you and is provided by third party service providers (Google Analytics). For further information about third service providers and opt-out options, please be sure to check out the information in Section 7 below.

The legal basis for such processing of personal information lies in our legitimate interest to analyze and enhance the performance of our Website and user experience. However, this does not imply that we track your online activities while using our Services.

Cookies are small files which may be stored on your computer during your use of the website and contain data about your use of the website. We use session cookies (which expire when you close your browser) and persistent cookies (which stay on your computer until you delete them or after a specified expiry date) to understand more about your activity on the website.

Please see Cookie Policy for details about how we use cookies and other tracking technologies and how you can control the cookies set on your browser.

Where permitted by law, this Privacy Policy does not limit our use or disclosure of de-identified, aggregate, pseudonymous or anonymous information, and we reserve the right to use and disclose such information to our partners, advertisers, and other third parties at our discretion.

2. WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?

We may share and disclose your personal information with approved partners acting on our behalf, or approved partners acting also on their own behalf.

We may share your personal data with third party service providers who assist us in carrying out our business activities. These third parties act as our data processors and are bound by strict contractual provisions to only process your personal data under our instructions and for the limited purposes we permit them. These third parties include (but are not limited to) background check companies, IT service providers, payroll processors; external professional advisors such as lawyers, accountants, and auditors to obtain professional services that assist us in the provision of our services.

We may also share your personal data with courts, tribunals, regulators and other governmental and public authorities (such as the police or tax authorities) to: (i) allow us to pursue legal remedies, (ii) to enforce our terms and conditions and protect our operations, (iii) to comply with legal process, (iv) to comply with applicable law, and (v) to respond to requests from public and governmental bodies.

Personal data will only be shared with the above recipients based on the following legal grounds:

- Consent: When we have obtained the explicit consent of the data subject.
- Contractual Necessity: When sharing is necessary to fulfill a contract with the data subject or to take steps at the data subject's request before entering into a contract.
- Legal Obligation: When sharing is necessary to comply with a legal obligation.
- Legitimate Interests: When sharing is necessary for our legitimate interests or those of a third party, provided such interests are not overridden by the data subject's rights and interests.

When sharing personal data, we will ensure that appropriate data processing agreements are in place with third-party service providers to protect personal data.

We implement suitable safeguards for international data transfers, such as standard contractual clauses to ensure an adequate level of protection for personal data transferred outside the European Economic Area (EEA).

We share only the minimum amount of personal data necessary for the intended purpose.

3. INTERNATIONAL TRANSFERS

Our servers, where data is stored and processed, are specifically located in the Netherlands. This ensures that all data handling, storage, and processing activities are conducted within the jurisdiction of the EU. We may transfer Personal Data collected within the EU to third countries (i.e., countries outside of the EU) only under specific legal bases or with your explicit consent for processing your personal information outside the EU. Personal Data transfer from the EU to third countries abroad can be based on an adequacy decision of the European Commission or standard contractual clauses provided by the European Commission. This means that Data recipients have committed to process Personal Data in compliance with the data protection standards set forth by EU data protection legislation.

We implement robust technical and organizational measures to protect personal data during transmission and while it is in the custody of third parties. These measures ensure the security and confidentiality of your data, preventing unauthorized access, disclosure, alteration, and destruction.

4. THIRD-PARTY PROCESSORS

The Company may, from time to time, employ the services of other parties (e.g., legal representatives, attorneys, tax accountants, auditors, analytics providers) for matters that may include, but are not limited to, carrying out settlements for the provided services and statutory information (reporting) in accordance with signed agreements. These agreements, such as those for payment handling, search engine facilities, advertising, and marketing, prohibit the use of personal data for any other purposes. Any data used by such parties is only to the extent required to perform the services requested.

Google Drive account access (Google LLC). This service allows to connect with the User's account on Google Drive, provided by Google LLC. Personal Data processed: Data communicated while using the service; Usage Data. Place of processing: United States – [Privacy Policy](#).

Google Analytics (Google LLC). These tools allow us to better understand the needs of our users and improve the experience of interacting with our services. Place of processing: United States – [Privacy Policy](#). Detailed information regarding Google Analytics' data practices and relevant instructions are accessible at [Google webpage about Using Google Analytics](#)

5. HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

In determining the appropriate retention period for different types of personal data, we always consider the amount, nature, and sensitivity of the personal data in question, the potential risk of harm from unauthorised use or disclosure of that personal data, the purposes for which we need to process it and whether we can achieve those purposes by other means (in addition of course to ensuring that we comply with our legal, regulatory and risk-management obligations).

We set out below the retention practices that we apply to certain categories of people.

Candidates

If you are a Candidate, we will keep your personal data on our database for a period of up to two years from the point that we collect such personal data or subsequently have meaningful contact with you (or, where appropriate, the company you are working for or with). After this period, it is likely your data will no longer be relevant for the purposes for which it was collected. We may keep your personal data on our database for a longer period than this if we believe in good faith that we need to do so, for example, because of our obligations to tax authorities or in connection with any anticipated litigation.

We have asked you to consent to us storing your personal data after that initial period for potential suitable positions or if you have opted in to receive any information generally about our recruitment campaigns.

If we do not hear from you, we will either delete your profile or archive your profile and create a dummy profile with only one data field (such as your email address) to help link any future applications.

You may withdraw your consent to retaining your personal data beyond the initial period after an application at any time.

If you do not consent to the retention of your data as set out here or you withdraw your consent, after 2 years of no activity we will take reasonable steps to either delete your profile or archive your profile and create a dummy profile with only one data field (such as your email address) to help link any future applications. This will not affect your ability to receive information on our recruitment campaigns.

In some circumstances, we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Customers

If you are a Customer we will retain your personal data in order to provide you with services or to receive services from you, or to provide you with information about our services that we believe you may be interested in.

If you have expressly indicated that you're not interested in our services, then we will delete your personal data unless we believe in good faith that we need to preserve it, for example, because of our obligations to tax authorities or in connection with any anticipated litigation.

Website Users

We retain the data collected through your interactions with our website and emails for as long as necessary to fulfill the purposes outlined in this Privacy Policy. This includes maintaining and improving our services, conducting marketing research, personalizing content and advertising, and ensuring security and fraud prevention. Specifically, we keep browser and device information, IP addresses, geolocation data, interaction details, and engagement metrics for a period that aligns with our operational and legal requirements. After this period, we securely delete or anonymize the

data to ensure your privacy. If you have any questions regarding our data retention practices, please contact us.

People whose data we receive / Referees

We will otherwise retain your data for as long as it is necessary to achieve the purpose it was collected or processed for. If this time has come or you have expressly indicated that you're not interested in our services we will delete it unless we believe in good faith that we need to preserve it, for example, because of our obligations to tax authorities or in connection with any anticipated litigation.

6. YOUR DATA PROTECTION RIGHTS

The European Union's General Data Protection Regulation and other countries' privacy laws provide certain rights for data subjects.

You may contact us CEO elena@personalinvest.org DPO amaurya@personalinvest.org to exercise any of the rights you are granted under applicable data protection laws.

If you are a resident of the European Union, United Kingdom, or EEA, you have;

(A) Right to access

You may ask us whether we collect or use any of your personal data and, if so, to receive access to that data in the form of a copy.

Reasonable access to your personal data will be provided at no cost. If access cannot be provided within a reasonable time frame (one month), we will provide you with a date when the information will be provided. If for some reason access is denied, we will provide an explanation as to why access has been denied. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

(B) Right to rectification

You have the right to have your data rectified if it is inaccurate or incomplete. Upon request, we will correct inaccurate personal data about you and, taking into account the purposes of the processing, complete incomplete personal data, which may include the provision of a supplementary statement.

(C) Right to erasure

You have the right to have your personal data erased. This means that we will delete your data. Erasure of your personal data only takes place in certain cases, as prescribed by applicable laws and listed in Article 17 of the General Data Protection Regulation (GDPR). This includes situations where your personal data is no longer necessary for the purposes for which it was originally processed and situations where your data was processed unlawfully. Due to the way in which we maintain certain services, it may take some time before backup copies are erased.

(D) Right to restriction of processing

You have the right to obtain a restriction on the processing of your personal data. This means that we will suspend the processing of your data for a certain period. Circumstances which may give rise to this right include situations where the accuracy of your personal data is contested, and we need some time to verify its (in)accuracy. This right does not prevent us from continuing to store your personal data. We will inform you before the restriction is lifted.

(E) Right to data portability

Your right to data portability entails that you may ask us to provide you with your personal data in a structured, commonly used and machine-readable format, and have such data transmitted directly to another controller, where technically feasible. Upon request and where this is technically feasible, we will transmit your personal data directly to the other controller.

(F) Right to object

You have the right to object to the processing of your personal data. This means you may ask us to no longer process your personal data. This only applies if the 'legitimate interests' ground (including profiling) constitutes the legal basis for processing. You can object to direct marketing at any time and at no cost to you if your personal data is processed for this purposes, which includes profiling to the extent that it is related to direct marketing. If you exercise this right, we will no longer process your personal data for such purposes.

H) Withdraw Consent

You have the right to withdraw your consent at any time where we are relying on consent to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

You have the right to complain to a **data protection authority**. If you are located in the European Union, you can have recourse to the European Data Protection Supervisor or the national data protection authority of the state of your residence.

You may withdraw your consent at any time by following the specific instructions concerning the processing for which you provided your consent. For example, you can withdraw consent by clicking the unsubscribe link in the e-mail. You may also contact:

CEO elena@personalinvest.org

DPO amaurya@personalinvest.org

Notice for US Residents

If you are a US resident, you have the rights to access, edit, and delete your personal information can be found below.

A) The **right to opt-out** of the sale of your personal information. We do not sell your personal information.

B) The **right to request deletion** of the personal information that we have collected from you, subject to certain exemptions (for example, where the information is used by us to detect security incidents, debugging or to comply with a legal obligation).

C) The **right to know** (request disclosure of) the personal information we collected about the consumer, from whom it was collected, why it was collected, and, if sold, to whom.

D) The **right to nondiscriminatory treatment** for exercising your privacy rights, subject to certain limitations.

E) The **right to initiate a private cause of action** for data breaches.

F) The **right to correct** inaccurate personal information.

You can submit a right-to-know or other request online by contacting us via email at amaurya@personalinvest.org. We have 45 days to respond to a verifiable consumer request of US residents. This period may be extended by another 45 days when necessary based on complexity and volume of requests.

Please note, when making a verifiable request, you will need to:

- Provide information for your identification and residency verification, including name, address, email, and security questions.
- Clearly describe your request.
- If an authorized agent is involved at your end, they must provide written authorization or a power of attorney.

If we can't verify your identity or connection to the request, we may ask for more information or documentation. We might also use third-party verification services to ensure data protection and proper handling of your request. The personal data provided by you for your verification will only be used for that purpose and deleted afterward.

We do not engage in the practice of selling and have not sold your personal information to any party without your notification and explicit opt-in consent.

For more information on how you can withdraw your consent for cookies and similar technologies we use when you visit our website, please check our Cookie policy.

7. HOW TO OPT OUT?

You may choose to opt-out from our marketing emails or prevent this Website from aggregating and analyzing your actions while using the Website as described below.

If you prefer not to receive marketing emails from us, you have the option to opt-out or unsubscribe by contacting us via email amauryna@personalinvest.org or clicking the "Unsubscribe" link at the bottom of our communications. If you have multiple email addresses, you will need to opt-out for each address individually to be excluded from our active database.

You have the option to control and manage the gathering and handling of data associated with your use of the Website by following the instruction provided below. It is important to keep in mind that opting to disable all cookies could impact the functioning of the Website; certain features that contribute to the Website's efficiency might not operate as intended.

Google Analytics: Should you wish to refrain from being tracked by Google Analytics, you can install and activate the [Google Analytics Opt-out Browser Add-on](#) (by Google). Furthermore, you have the ability to manage cookies and/or delete cookies that have already been established by Google Analytics by accessing your browser settings. Detailed information regarding Google Analytics' data practices and relevant instructions are accessible at [Google webpage about Using Google Analytics](#)

8. HOW DO WE SAFEGUARD YOUR PERSONAL DATA?

We are committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorised access. These include measures to deal with any suspected data breach. We employ appropriate technical, organisational and industry-standard security measures, including encryption and access controls, to safeguard your data. We also advise you to protect your data, particularly in public spaces and online interactions. If you suspect any misuse or loss of or unauthorised access to your personal information please let us know immediately by amauryna@personalinvest.org.

9. POLICY UPDATES

This policy may be updated periodically to reflect changes in our practices or regulations.

10. CONTACT INFORMATION

If you have questions or concerns about this policy or your personal data, contact us by e-mail amauryna@personalinvest.org.