## Contents

1. Data Protection Officer ................................................................. 1
2. Information We and Others Collect from You and How It Is Collected ... 1
3. How Your Information Is Used and Processed .................................. 3
4. How We Follow Visits and Usage, Why and How You Keep Control ...... 5
5. How Your Information Is Shared ..................................................... 6
6. How Your Information Is Kept Safe ................................................. 7
7. How Your Information Is Internationally Transferred ....................... 7
8. How Your Information Is Stored and Retained ............................... 7
9. What Privacy Choices and Changes Are Available to You .................. 8
10. Your European Privacy Rights ...................................................... 8
11. Changes to This Privacy Policy .................................................... 10
12. Enforcement .................................................................................. 10
This Ubidy Privacy Policy applies when information ("Personal Data") about you is collected by Ubidy in the context of service activities and explains how Ubidy uses such information to provide you services. Personal Data is any data collected through our platform that can be used to identify an individual or organization.

This Ubidy Privacy Policy ("Privacy Policy") describes the various ways that Ubidy ("Ubidy" or "we" or "us" or "our") process the information you provide to us or we gather from you on the platform. The "Platform" includes the various Ubidy online, digital, electronic sites and technologies, including public-facing sales and marketing websites ("Websites"), software applications, social media pages, chat features and online conversations, or HTML-formatted e-mail messages we use to facilitate our services.

Data Controller: The data controller is the Ubidy legal entity which initially collects your information and decides how and why to use the data. When you visit a Ubidy website, the data controller is the Ubidy entity named in the Terms & Conditions page on the website. We only store the Personal Data as long as legally permissible.

1 Data Protection Officer

Ubidy’s Data Protection Officer (DPO) is MHA MacIntyre Hudson, Abbey Place, 24-28 Easton Street, High Wycombe, United Kingdom, HP11 1NT, who may be contacted at privacy@ubidy.com.

2 What Information We and Others Collect from You and How It Is Collected

We collect information, called ("Personal Data"), about you directly, indirectly and/or automatically as described below.

To the extent permitted by applicable law, we combine the information collected as described below, including information about the organization for which you work; other information in our possession; or information that you provide to us; and we treat both the combined and unique information as Personal Data.

Direct collection of business information and Personal Data:

To maintain the security of Ubidy's internal databases, access by software programs must be granted only after authentication with credentials. The credentials used for this authentication must not reside in the main, executing body of the program's source code in clear text. Database credentials must not be stored in a location that can be accessed through a web server.

When you access, use and/or interact with us through the platform, we directly collect information you voluntarily provide us. This includes but is not limited to:

- Information about you in the context of your professional activities, such as your name, professional email addresses, and (professional) telephone numbers;
- Information about your company such as the name, location of your company and its office(s), your role within the company, company history/biography, industry classification[s] and testimonials;
In the case of employers, information about the open job vacancies you upload onto the platform for recruitment;

In the case of agencies, information about the rates at which you desire to provide recruitment services for open vacancies;

Information you may choose to provide us when completing any “free text” boxes on our forms (if any at all, for example in clarifications, notes and CV comments) or when posting information or materials on our messaging application.

Examples of direct interactions with you through the platform where you provide us business information and Personal Data about you are the following:

- completion and submission of online registration and profile forms;
- completion of user roles;
- creation and contribution to messaging discussion groups;
- for employers, creation of recruitment projects, talent requests, and auctions;
- exchange of clarifications;
- For agencies, submission of bids and uploading of candidates;
- contacting customer support as part of a contractual or informational request, indirect collection of business information and Personal Data;

**Automatic collection of business information and Personal Data:**

When you access, use and/or interact with us through the platform, you do so using a “Device”, which is either a personal computer, desktop or laptop, or a mobile device such as a phone or a tablet for instance. A “Device Identifier” is the number that is automatically assigned to the Device you use to access the platform; it allows us to identify your Device through its Device Identifier. The “Tracking Technologies” are the various technologies we use to automatically collect Device Identifiers and other information about you, such as:

- Information that is logged automatically: your computer's operating system, Internet Protocol (IP) address (including information derived from your IP address such as your geographic location), Device Identifier, access times, browser type, device type, domain name, access times, duration of visit, referring URL, platform, new and repeat information, time stamp and language, and referring website addresses;
- Behavioral data about your usage and activity on the platform: webpages clicked, websites and content areas visited, content downloaded, date and time of activities;
- Past transactional behavior on the platform based on your prior interactions with us;

The information collected through Tracking Technologies may be considered Personal Data under applicable data protection laws. For additional information about our use of Tracking Technologies, please see below in How We Follow Visits and Usage, Why and How You Keep Control (Cookies, Analytics and Advertising).
3 How Your Information Is Used and Processed

Legal Basis for Processing: We collect and process your Personal Data with your consent as necessary to provide the services you use on the platform, fulfill recruitment requirements, operate our business, meet our contractual and legal obligations, ensure compliance, protect the security of our systems and our customers, or fulfil other legitimate interests.

Freely Given Consent: As a general principle, granting your consent and providing business information and Personal Data about you is entirely voluntarily and there are no adverse consequences to you if you do not grant a consent when required under applicable law or do not provide the required information. However, there are circumstances where Ubidy cannot act without certain Personal Data because such information is required. In these cases, without the relevant Personal Data, Ubidy will not be able to provide you with what you requested.

Purposes of Processing: We use and process Personal Data collected through the platform for purposes and on the legal basis as described below:

- To provide the services requested on the platform:
  - If you request services from Ubidy, we will use the Personal Data which you enter into the platform to provide the requested service such as opening an auction into the marketplace, processing agency applications, presenting candidates for consideration, etc. This may also include conversation data that you may trigger on the platform (chat-functionalities or other web appearances, contact forms, e-mails or telephone). In this Privacy Policy, “services” includes (access to) Ubidy’s web services, offerings, other content, non-marketing related newsletters, whitepapers, tutorials, trainings, events, conferences, webinars and seminars.
  - When you request such services from us, we may communicate with you via email and phone to resolve customer complaints, investigate suspicious transactions, confirm your preferences, send you notice of payments or information about changes to our services, and to send notices, updates, technical notices, security alerts, support and other administrative messages and other disclosures as required by law. Generally, you cannot opt out of these communications, which are not marketing related but merely required to fulfil your request in the context of the relevant business relationship you initiated.

- To ensure compliance:
  - We use your Personal Data to prevent, detect, mitigate, and investigate fraudulent or illegal activity.
  - The information required to track your choices regarding the processing or use of your Personal Data or receiving marketing materials is based on the country law in which the relevant Ubidy company operates and is stored and exchanged between members of the Ubidy group as necessary to ensure compliance.
• To operate and improve our platform services, to keep you up to date, to follow-up on a referral or request your feedback. Ubidy processes and uses your Personal Data based on its legitimate interest use cases below.

• Questionnaires and surveys. We may invite you to participate in questionnaires and surveys. If Personal Data is included in questionnaires and surveys, Ubidy may use such Personal Data for marketing research and to improve its products and services.

• Creation of anonymized data sets. We may anonymize Personal Data provided under this Privacy Policy to create anonymized data sets which will then be used to improve Ubidy products and services, or for insights into our customer behavior for PR purposes.

• Recording of calls and chats for quality improvement purposes. In case of telephone calls or chat sessions, we may record such calls (after informing you accordingly during that call and before the recording starts) or chat sessions to improve the quality of our services.

• To keep you up-to-date and request feedback. Within an existing business relationship between you and Ubidy, we may inform you, where permitted in accordance with local laws, about our services (including webinars, seminars, conferences or events) which are similar or relate to services you have already ordered or used from Ubidy. In addition, when you have attended a webinar, seminar or event of Ubidy or used a service from Ubidy, we may contact you for feedback regarding the improvement of the relevant webinar, seminar, event, good or service.

• To provide updates about Ubidy’s services:
  
  o We use your Personal Data collected through the platform (to (i) keep you up to date on the latest product announcements, product updates, unique offers, and other information regarding Ubidy’s services (including marketing-related information or newsletters) as well as events of Ubidy and (ii) to display relevant content on our Platform and provide a personalized experience and implement the preferences you request.

  o With regard to marketing and promotional related types of communication including providing personalized updates about Ubidy’s services as described above (i.e. emails and phone calls), we will (i) where legally required only provide you with such information after you have granted your consent to such electronic communications (also commonly called “opt-in”) and (ii) provide you the opportunity to exercise an opt-out choice if you do not want to receive further marketing related types of communication from us.

  o We also maintain Ubidy Notification Settings for you to manage your notification preferences and your opt-out choices.
4 How We Follow Visits and Usage, Why and How You Keep Control (Cookies, Analytics and Advertising)

Below are examples of Tracking Technologies that we may use to collect information (and subsequent technology and methods that hereafter used).

Cookies. We may automatically collect information using "cookies." Cookies are small data files stored on your browser by a Website. Among other things, cookies help us improve our Platform and your experience. We use cookies to enable secured sessions on our platform, to see which areas and features are popular and to count visits to our websites. If you set your browser not to accept cookies or if you reject a cookie you will not be able to use the Platform.

First and third-party cookies. We use first and third-party cookies on our Platform. Whether a cookie is 'first' or 'third' party refers to the domain placing the cookie. First-party cookies are those set by a website that you are visiting at the time (e.g., cookies placed by ubidyap.com while visiting ubidyapp.com). Certain cookies are set by a domain other than that of the website you are currently visiting. If you visit a website and another entity sets its cookie or reads its cookie through that website, this would be a third-party cookie (e.g., cookies placed by www.google.com while visiting www.ubidy.com).

Persistent and session cookies. We use persistent cookies and session cookies on our Platform. Persistent cookies remain on your Device for the period of time specified in the cookie and these are used to remember your preferences within our website. Persistent cookies can remain after you end a browser session. A browser session starts when you open a browser window and finishes when you close the browser window. Session cookies allow us to link your actions during a browser session. Session cookies are created temporarily. Once you close the browser, session cookies are typically deleted. You can find out more information on cookies at: http://www.allaboutcookies.org/

Web Beacons. We may collect information using web beacons. Web beacons are electronic images that may be used on our websites or in our emails. We use web beacons to deliver cookies, count visits, understand usage and campaign effectiveness and to tell if an email has been opened and acted upon.

ETag, or entity tag. A feature of the cache in browsers. It is an opaque identifier assigned by a web server to a specific version of a resource found at a URL. If the resource content at that URL ever changes, a new and different ETag is assigned. Used in this manner, ETags are a form of Device Identifier. ETag tracking may generate unique tracking values even where the consumer blocks HTTP, Flash, and HTML5 cookies.

Flash LSOs. When we post videos or other media on our websites, third parties may use local shared objects, also known as Flash cookies, to store your preferences for volume control, or to personalize certain features. Flash cookies are different from browser cookies because of the amount of, type of, and how data is stored. Cookie management tools provided by your browser will not remove Flash cookies. To learn how to manage privacy and storage settings for Flash cookies click here: http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager.html#117118

Buttons, tools, and content from other companies: Our Platform use interfaces with social media sites such as Facebook, LinkedIn, Twitter and others. These features may collect
your IP address, which page you are visiting on our websites, and may set a cookie to
enable the feature to function properly. If you choose to "like" or share information from
our Platform our website(s) through these features, some information from your browser
may automatically be sent to the other company and you should review the privacy
policy of that service. If you are a member of a social media site, the interfaces may
allow the social media site to connect your site visit to your Personal Data.

Publisher provided identifiers (PPIDs): these are identifiers we use alongside cookies and
other Tracking Technologies in connection with personalized content on our Platform, in
applications, in our emails and elsewhere. The PPID allows us to have a consistent
identifier for you across devices from which you use our apps and access our sites.

Analytics: We use analytics, including analytics conducted by third party partners, to
help improve our Platform and your user experience, such as remembering you when
you return, understanding your preferences and interests, and knowing which of our
Web pages are visited and which Platform are most often used.

5 How Your Information Is Shared

The Ubidy service allows you or your organization to share information about you
(including Personal Data) with other users of the service. You or your organization can
use the functionality within the service to determine which information you want to share
and with whom.

For Employers, some of your information is available to agencies on the platform, including:

<table>
<thead>
<tr>
<th>GENERALLY AVAILABLE TO AGENCIES AFTER YOUR REGISTRATION ON THE PLATFORM</th>
<th>AVAILABLE TO AGENCIES VIA YOUR SPECIFIC CONSENTING ACTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Contact Details, Locations &amp; Addresses, Social Media Links</td>
<td>• Projects &amp; Talent Requests</td>
</tr>
<tr>
<td>• Company Biography</td>
<td>• Job Descriptions</td>
</tr>
<tr>
<td>• Sectors, Industries and Classifications (Optional)</td>
<td>• Success Fee and Competitive Auctions and details</td>
</tr>
<tr>
<td></td>
<td>• Clarifications, Comments, Messaging Users</td>
</tr>
</tbody>
</table>

For Agencies, some of your information is available to Employers on the platform, including:

<table>
<thead>
<tr>
<th>GENERALLY AVAILABLE TO EMPLOYERS AFTER YOUR REGISTRATION ON THE PLATFORM</th>
<th>AVAILABLE TO EMPLOYERS VIA YOUR SPECIFIC CONSENTING ACTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Contact Details, Locations &amp; Addresses, Social Media Links</td>
<td>• Prequalification Requests and Prequalification Documents</td>
</tr>
<tr>
<td>• Company Biography</td>
<td>• Application Requests</td>
</tr>
<tr>
<td>• Sectors, Industries and Classifications</td>
<td>• Bids</td>
</tr>
<tr>
<td>• Client History (Optional)</td>
<td>• Clarifications, Comments, Messaging Users</td>
</tr>
<tr>
<td>• Testimonials (Optional)</td>
<td>• Candidates Users</td>
</tr>
</tbody>
</table>
In addition to the foregoing, for the purposes described in this policy, Ubidy may disclose personal information:

- Where you or your organization have otherwise consented;
- As stated in our contracts with your organization;
- To anyone to whom our assets or business (or any part of it) is transferred or offered to be transferred (subject to notice to you); or
- As otherwise required or authorized by law.

We utilize some third-party technology vendors that help us run our platform activities. These companies provide services such as email delivery, information technology and related infrastructure provision, data analysis and insight, auditing and other similar services. These vendors, which may be supplied with basic Personal Information (such as names and email addresses) to carry out their functions, act strictly as processors and not data controllers and are subject to equivalent privacy policies as our own.

6 How Your Information Is Kept Safe

Ubidy maintains data handling and storage practices and procedures that are designed to promote the integrity and confidentiality of Personal Data. We update and test our security technology on an ongoing basis. We use commercially acceptable means to protect your personal information to prevent loss, misuse and unauthorized access, disclosure, alteration and destruction.

7 How Your Information Is Internationally Transferred

As a global company, Ubidy transfers and/or stores data within as well as outside of the European Economic Area (EEA). Therefore, your Personal Data may be transferred, used, processed or stored in the United States or the other countries where Ubidy operates or maintains data centers, namely Australia and India. We take steps designed to ensure that the Personal Data we collect under this Privacy Policy is processed according to the provisions of this Privacy Policy and applicable law wherever the data is located. By providing your information to us on our Platform, you agree to that transfer, storage, and processing in the U.S. Also, we may transfer your data from the U.S. to the above countries in connection with storage and processing of data, fulfilling your requests, and operating the Platform.

When we transfer Personal Data from the European Economic Area and Switzerland to other countries, some of which have not been determined by the European Commission to have an adequate level of data protection, such transfer is based on the Standard Contractual Clauses (according to EU Commission Decision 87/2010/EC or any future replacement) in order to contractually ensure that your Personal Data is subject to a level of data protection which applies within the EEA.

8 How Your Information Is Stored and Retained

We store and retain your Personal Data for as long as necessary to fulfill the purposes described in this Privacy Policy, such as provide services requested by you, responding to your inquiries or for other essential purposes such as complying with our legal obligations, resolving disputes, and enforcing our agreements, or until you object to Ubidy’s use of your Personal Data (if Ubidy’s use of your Personal Data is based on a legitimate interest)
or you withdraw your consent (if Ubidy’s use of your Personal Data is based on your consent).

For clarity, in circumstances where we are required by mandatory law to retain your Personal Data longer (such as for tax, legal, accounting or other purposes) or where we need your Personal Data to assert or defend against legal claims, we will retain such information until the end of the relevant retention period or the settlement of the claims at stake.

9 What Privacy Choices and Changes Are Available to You

Notification Settings. You can customize and control your notification preferences in the Ubidy Notification Settings, where you can return at any time to change your selections. You can also unsubscribe from promotional emails by: (1) following the unsubscribe instructions in our emails; or (2) emailing us at privacy@ubidy.com. If you have any problems using any of these opt-out mechanisms, please contact us at privacy@ubidy.com. Please note that even if you unsubscribe from promotional email messages, we may still need to contact you with transactional information related to the services you have ordered or requested on the Platform.

Do Not Track. You can manage your preferences in your personal web browser settings as we honor “Incognito” or “Do Not Track” settings.

Analytics & Advertising: We encourage you to review the privacy policies of our third-party analytics service provider (Google Analytics) to learn about your choices about information they collect from you. To opt-out of Google Analytics web tracking you can download Google Analytics Opt-out Browser Add-on.

10 Your European Privacy Rights

We adhere to applicable data protection laws in the European Economic Area, which, if applicable to you, includes the rights described hereafter. If you wish to exercise any privacy right that is available to you, we will process your request in accordance with applicable data protection laws. We may need to retain certain information for record-keeping purposes and/or to complete transactions that you began prior to requesting any deletion.

Right not to provide consent or to withdraw consent: Where we seek to rely on your consent in order to process certain parts of your Personal Data, you have the right not to provide your consent or to withdraw your consent at any time. In case of withdrawal, Ubidy will not process the Personal Data subject to this consent any longer unless legally required to do so. In case we are required to retain your Personal Data for legal reasons, such data will be restricted from further processing and only retained for the term required by law. Withdrawal of consent does not affect the lawfulness of the processing based on consent before its withdrawal. Furthermore, if your use of a service requires your prior consent, we will not be (any longer) able to provide the relevant service to you after withdrawal of your consent.

Right of Information and Access: You can require Ubidy to confirm at any time that Ubidy is processing your Personal Data, or to have access to the Personal Data Ubidy may have about you. You may also request information about: the purpose of the
processing; the categories of Personal Data concerned; who else outside Ubidy might have received the data from Ubidy; what the source of the information was (if you didn’t provide it directly to Ubidy); and how long it will be stored. Reasonable access to your Personal Data will be provided at no cost to you upon request. If access cannot be provided within a reasonable time frame, Ubidy will provide you with a date when the information will be provided. If for some reason access is denied, Ubidy will provide an explanation as to why access has been denied.

**Right to Rectification:** You have a right to correct (rectify) the record of your Personal Data maintained by Ubidy if it is inaccurate.

**Right of Erasure (also called Right to Be Forgotten):** In certain circumstances, you may have the right to the erasure of Personal Data that we hold about you (for example if it is no longer necessary for the purposes for which it was originally collected).

**Right to Data Portability:** If Ubidy uses your Personal Data on the legal basis of either your consent or performance of a contract with you, beyond and above mere information about your Personal Data, you may request from Ubidy a copy of the Personal Data you provided us, clearly stating which Personal Data you require from Ubidy in which format and whether the Personal Data shall be provided to you or another recipient. We will carefully review your request and discuss with you how it can be best implemented.

**Right to Restriction of Processing:** You can request from Ubidy that Ubidy restricts your Personal Data from any further processing in certain circumstances (for example, where you believe that the Personal Data we hold about you is not accurate or lawfully held; another example is where you object against the processing of your Personal Data by Ubidy on the grounds of legitimate interest, in such case you have a right to restrict processing of your Personal Data while Ubidy will verify if it has a prevailing interest in processing your Personal Data).

**Right to Object to Processing based on Legitimate Interest:** Where we rely on the grounds of our legitimate interest to process certain parts of your Personal Data, you have the right to object to such processing at any time. If you do so, we will cease using your Personal Data and remove it from our systems unless such Personal Data is permitted to be used by Ubidy for another purpose set out in this Privacy Policy or we determine and demonstrate a compelling legitimate interest to continue in processing your Personal Data.

**Other right:** As applicable under French law, you can also send us specific instructions regarding the use of your Personal Data after your death.

**Right to lodge a complaint:** If you take the view that Ubidy is not processing your Personal Data in accordance with the requirements set out in the Privacy Policy or applicable EEA data protection laws if such laws apply to you, you can at any time lodge a complaint with the data protection authority of the EEA country where you live or with the data protection authority of the country or state where the Ubidy controller that collected your Personal Data has its registered seat. A list of the national data protection authorities can be found here: [http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm). If you would like to exercise any of the above rights, please contact privacy@ubidy.com so that we may consider your request under applicable law, verify any relevant legal requirements and exemptions, including steps to verify your identity before complying with the request.
11 Changes to This Privacy Policy

We may update this Privacy Policy from time to time without notice to you other than posting the revised Privacy Policy on the Platform or by providing such notice about or obtaining consent to changes as may be required by applicable law. If we change our Privacy Policy, we will post those changes to this Privacy Policy and change the "last revised" date above. We encourage you to periodically https://www.ubidy.com/privacy-policy review this Privacy Policy for the latest information on our privacy practices.

12 Enforcement

If you have any questions about this Privacy Policy or to file any complaint regarding this Privacy Policy, please contact us at the following address:

Director, Privacy & Security
Ubidy Technology Group Ltd
488 Queen Street
Brisbane, QLD, Australia

Email: privacy@ubidy.com

Ubidy will investigate and attempt to resolve complaints and disputes regarding the collection, use, and disclosure of Personal Data by referencing the privacy principles stated in this Privacy Policy.