

Privacy Policy

This Privacy Policy describes how MOBIPRO collects, stores, uses, and discloses the following categories of personal data:

(i) **Customer Data:** personal data that we collect, process, and manage on behalf of our business customers (“**Customers**”), submitted to the MOBIPRO cloud-based services, including our platforms, products, applications, application programming interface (“**API**”), tools, and any ancillary or supplementary MOBIPRO products and services (including Upgrades, offered online and via a mobile application (collectively, “**Platform**”).

We process such Customer Data on behalf and under the instruction of the respective Customer in our capacity as a “data processor.”

(iii) **Prospect Data:** data relating to visitors of our websites (including but not limited to www.mobipro.com), participants at events, and any other prospective customer, user or partner (collectively, “**Prospects**”) who visit or otherwise interact with our programs, marketing and social activities and our websites, digital ads and content, emails, integrations or communications under our control (“**Sites**”).

(iv) **Technology Partner Data:** data relating to individuals participating and/or engaging as a participant, candidate, applicant or any other prospective or existing technology partners (including as developer or technology ambassadors) (collectively, “**Technology Partner**”) who interact with our Platform, Sites, events and/or other platforms utilized by MOBIPRO

If you are a Customer, User, Prospect or Technology Partner, please read this Privacy Policy carefully and make sure that you fully understand it.

You are not legally required to provide us with any of your personal data and may do so (or avoid doing so) at your own free will. 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, please simply do not visit or interact with our Sites, nor use our Services.

You may also choose not to provide us with “optional” personal data (i.e. “not required” fields on forms), but please keep in mind that without it we may not be able to provide you with product license/s and other range of our Services or with the best user experience when using our Services.

1. Data Collection & Processing

When we use the term “personal data” in this Privacy Policy, we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to an individual. It does not include aggregated or anonymized information that is maintained in a form that is not reasonably capable of being associated with or linked to an individual.

We collect or generate the following categories of personal data in relation to the Services:

- **Usage and device information concerning our Users, Prospects and Technology Partners:**

Connectivity, technical and usage data, such as IP addresses and approximate general locations derived from such IP addresses, device and application data (like type, operating system, mobile device or app id, browser version, location and language settings used), activity logs, the relevant cookies and pixels installed or utilized on your device, and the recorded activity (sessions, clicks, use of features, logged activities and other interactions) of Prospects, Users and Technology Partners in connection with our Services.

We collect and generate this information automatically, including through the use of analytics tools (including cookies and pixels) – which collect data such as: how often Prospects or Technology Partners visit or use the Sites, which pages they visit and when, which website, ad or email message brought them there, and how Users interact with and use the Platform and its various features.

- **Contact and profile information concerning our Customers, Users, Prospects and Technology Partners:**

Name, email, phone number, position, workplace, profile picture, login credentials, contractual and billing details, and any other information submitted by Account Admins and Users or otherwise available to us when they sign up or log in to the Platform (either directly or through their social media or organizational Single-Sign-On account), when creating their individual profile ("**User Profile**"), or by updating their account.

We collect this information directly from you, or from other sources and third parties such as our Customer (your employer), Users and colleagues, organizers of events or promotions that both you and us were involved in, and through the use of tools and channels commonly used for connecting between companies and individual professionals in order to explore potential business and employment opportunities, such as LinkedIn

- **Communications with our Customers, Users, Prospects and Technology Partners:**

Personal data contained in any forms and inquiries that you may submit to us, including support requests, interactions through social media channels and instant messaging apps, registrations to events that we host, organize or sponsor, and participation in our online and offline communities and activities); surveys, feedback and testimonials received; expressed, presumed or identified needs, preferences, attributes and insights relevant to our potential or existing engagement; and sensory information including phone call and video conference recordings (e.g., with our customer experience or product consultants), as well as written correspondences, screen recordings, screenshots, documentation and related information that may be automatically recorded, tracked, transcribed and analyzed, for purposes including analytics, quality control and improvements, training, and record-keeping purposes.

2. Data Uses & Legal Bases

We use personal data as necessary for the performance of our Services (“**Performance of Contract**”); to comply with our legal and contractual obligations (“**Legal Obligations**”); and to support our legitimate interests in maintaining and improving our Services, e.g. in understanding how our Services are used and how our campaigns are performing, and gaining insights which help us dedicate our resources and efforts more efficiently; in marketing, advertising and selling our products and Services to you and others; providing customer services and technical support; and protecting and securing our Users, Customers, Prospects and Technology Partners, ourselves and our Services (“**Legitimate Interests**”).

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 processing personal data as described in this Privacy Policy (either in general, based on the types of personal data you expect or elect to process or have processed by us or via the Services, or due to the nature of such processing) (“**Consent**”), your acceptance of our terms and of this Privacy Policy will be deemed as your consent to the processing of your personal data for all purposes detailed in this Privacy Policy, unless applicable law requires a different form of consent. If you wish to revoke such consent, please contact us.

Specifically, we use personal data for the following purposes (and in reliance on the legal bases for processing noted next to them, as appropriate):

Customer and User personal data

- To facilitate, operate, enhance, secure, and provide our Services; (*Performance of Contract; Legitimate Interests*)
- To invoice and process payments (*Performance of Contract; Legitimate Interests*); and
- To personalize our Services, including by recognizing an individual and remembering their information when they return to our Services, and to provide further localization and personalization capabilities.

Customer, User, Prospect and Technology Partner personal data

- To provide our Prospects, Users, Technology Partners and Customers with assistance and support, to test and monitor the Services, diagnose, or fix technical issues, and to train our Customers' and Customer-facing staff (*Performance of Contract, Legitimate Interests*)
- To gain a better understanding of how Users, Prospects and Technology Partners evaluate, use, and interact with our Services, to utilize such information to continuously improve our Services, the overall performance, user-experience, and value generated therefrom. We collect such information automatically through their usage of the Services, including through User's utilization of artificial intelligence capabilities in the Platform (*Legitimate Interests*)
- To create aggregated, statistical data, inferred non-personal data or anonymized or pseudonymized data (rendered non-personal), which we or others may use to provide and improve our respective Services, or for any other business purpose such as business intelligence (*Legitimate Interests*)
- To facilitate and optimize our marketing campaigns, ad management and sales operations, and to manage and deliver advertisements for our Services more effectively, including on other websites and applications. Such activities allow us to highlight the benefits of using our Services, and thereby to increase your engagement and overall satisfaction with our Services. This includes contextual, behavioral, and interests-based advertising based on User, Prospect and Technology Partner activities, preferences, or other data available to us or to our Services Providers (as defined below), and business partners (*Legitimate Interests, Consent*)
- To contact our Customers, Users, Prospects and Technology Partners with general or personalized Services-related messages, as well as promotional messages that may be of specific interest to them (*Performance of Contract; Legitimate Interests; Consent*)
- 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 (*Performance of Contact; Legitimate Interests; Legal Obligation*)
- To explore and pursue growth opportunities by facilitating a stronger local presence and tailored experiences, including through partnerships

with local distributors, resellers, business partners and providers of professional services related to our Services (“**Partners**”)

- To publish your feedback and submissions to our Sites, public forums, and blogs (*Performance of Contract, Legitimate Interests*)
- To comply with our contractual and legal obligations and requirements, and maintain our compliance with applicable laws, regulations, and standards (*Performance of Contract; Legitimate Interests; Legal Obligation*); and
- For any other lawful purpose, or other purpose that you consent to in connection with provisioning our Services. (*Legal Obligation; Consent*).
- Facilitating, operating, supporting, providing, and improving user-facing features that are prominent in the Integrated Google Services (*Performance of Contract, Legitimate Interests*)
- Troubleshooting or security purposes (such as investigating a bug or abuse), subject to the Users’ prior consent, access to Restricted personal data is required to resolve a support issue (*Performance of Contract, Legitimate Interests*)
- Compliance with applicable law and regulations (*Legal Obligation*)
- For our internal operations, provided that the Restricted personal data (including derivations thereof) have been aggregated and anonymized (*Legitimate Interests*)
- Transfer of the Restricted personal data to third acquisition,¹) in accordance with this Privacy Policy, solely to the extent necessary to provide or improve the Integrated Google Services; (2) to comply with applicable laws and regulations; and (3) in connection with any change in control, including by means of merger, acquisition or purchase of substantially all of MOBIPRO assets (*Performance of Contract; Legitimate Interests; Legal Obligation*); or
- Otherwise in strict accordance with your affirmative agreement.

3. Data Location & Retention

Data Location: We and our authorized Service Providers maintain, store and process personal data in the United States (US), Europe, Japan, the United Kingdom (UK), and other locations as reasonably necessary for the proper

performance and delivery of our Services, or as may be required by applicable law.

While privacy laws vary between jurisdictions, MOBIPRO, its affiliates and Service Providers are each committed to protect personal data in accordance with this Privacy Policy, customary and reasonable 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.

MOBIPRO LLC is headquartered in USA.

Complaints about transfers of data from the EU, UK or Switzerland to the US & dispute resolution: In compliance with the DPF Principles, we commit to resolve complaints about our collection or use of your personal data. EEA, UK and Swiss individuals with inquiries or complaints regarding our DPF compliance should submit enquiries to info@mobipro.com

Furthermore, subject to certain conditions (as described under the EU-US DPF Principles that MOBIPRO adheres to), you may invoke binding arbitration by delivering a notice to us via email MOBIPRO is also subject to the investigatory and enforcement powers of the Federal Trade Commission.

Data Retention: We may retain your personal data for as long as it is reasonably needed to maintain and expand our relationship and provide you with our Services and offerings; in order to comply with our legal and contractual obligations; or to protect ourselves from any potential disputes (e.g. as required by laws applicable to log-keeping, records and bookkeeping, 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 data retention policy and at our reasonable discretion. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of such data, the potential risk of harm from unauthorized use or disclosure of such data, the purposes for which we process it, and the applicable legal requirements. If you have any questions

about our data retention policy, please contact us by email at info@mobipro.com.

4. Data Disclosure

We may disclose personal data in the following instances:

Service Providers: We engage selected third-party companies and individuals as “Service Providers”, to perform services on our behalf or complementary to our own. These include providers of Third Party Services such as: hosting and server co-location services, communications and content delivery networks (CDNs), data and cyber security services, billing and payment processing services, fraud detection, investigation and prevention services, web and mobile analytics, email and communication distribution and monitoring services, session or activity recording services, call recording, analytics and transcription services, event production and hosting services, remote access services, performance measurement, data optimization and marketing services, social and advertising networks, content, lead generating and data enrichment providers, email, voicemails, video conferencing solutions, support and customer relation management systems, third-party customer support providers, and our legal, compliance and financial advisors and auditors.

Our Service Providers may have access to personal data, depending on each of their specific roles and purposes in facilitating and enhancing our Services or other activities, and may only use the data as determined in our agreements with them.

Partnerships: We engage selected business and channel partners, resellers, distributors, and providers of professional services related to our Services, which allow us to explore and pursue growth opportunities by facilitating a stronger local presence and tailored experiences for our prospective and existing Customers and Users. In such instances, we may disclose relevant contact, business, and usage details to the respective Partner, to allow them to engage with those Customers and Users for such purposes. If you directly engage with any of our Partners, please note that any aspect of that engagement which is not directly related to the Services and directed by

MOBIPRO is beyond the scope of MOBIPRO Terms and Privacy Policy and may therefore be governed by the Partner's terms and privacy policy.

Any content submitted by you to private boards may still be accessed, copied, and processed by the Account Admin(s). Your User Profile and personal data will also be made available to all the authorized Users who can view the same board(s) as you.

If you register or access the Services using an email address at a domain that is owned by your employer or organization (our Customer), and another team within such Customer's organization wishes to establish an account on the Services, certain information about you including your name, profile picture, contact info and general use of your Account will become accessible to the Account Admin and Users.

Feedback or Recommendations: If you submit a public review or feedback, note that we may (at our discretion) store and present your review publicly, on our Sites and Services. If you wish to remove your public review, please contact us at info@mobipro.com. If you choose to send others an email or message inviting them to use the Services, we may use the contact information you provide us to automatically send such invitation email or message on your behalf. Your name and email address may be included in the invitation email or message.

Community Forum We also manage and participate in various social channels and communities on other platforms. Any information you submit on these forums, blogs, and communities – including profile information associated with the User Profile you use to post the information – may be read, collected, and used by others who access these Sites. Due to the nature of such public forums, your posts and certain profile information may remain visible to all. To request removal of your information from publicly accessible Sites operated by us, please contact us, and note the Sites from which you would like your information to be removed. In some cases, we may not be able to remove your information, in which case we will let you know if we are unable to and why.

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), or in compliance 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 an 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 products and Services.

Protecting Rights and Safety: We may disclose your personal data to others if we believe in good faith that this will help protect the property rights, or safety of MOBIPRO, any of our Users or Customers, or any members of the public.

MOBIPRO Subsidiaries: We disclose personal data internally within our group of companies, for the purposes described in this Privacy Policy. In addition, should MOBIPRO or any of its subsidiaries undergo any change in control, including by means of merger, purchase, or acquisition of substantially all its assets, your personal data may be disclosed with the parties involved in such an event. If we believe that the 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 email or prominent notice on our Services.

For the avoidance of doubt, MOBIPRO may disclose your personal data in additional manners, pursuant to your explicit approval, if we are legally obligated to do so, or if we have successfully rendered such data non-personal and anonymous.

5. Cookies and Tracking Technologies

Our Sites and Services (including some of our Services Providers) utilize “cookies”, anonymous identifiers, pixels, container tags and other technologies for us to provide and monitor our Services and Sites, to ensure that they perform properly, to analyze our performance and marketing activities, and to personalize your experience. Such cookies and similar files or tags may also be temporarily placed on your device. Certain cookies and

other technologies serve to recall personal data, such as an IP address, as indicated by a Prospect, User or Technology Partner.

Please note that we do not change our practices in response to a “Do Not Track” signal in the HTTP header from a browser or mobile application, however, most browsers allow you to control cookies, how to accept them and how to remove them. You may set most browsers to notify you if you receive a cookie, or to block or remove cookies altogether.

6. Communications

We engage in Services and promotional communications, through email, phone, SMS, and notifications.

Services Communications: We may contact you with important information regarding our Services. For example, we may send you notifications (through any of the means available to us) of changes or updates to our Services billing issues.

Promotional Communications: We may also notify you about new features, additional offerings, events and special opportunities or any other information we think you will find valuable, such as our Customer, User or Prospect. We may provide such notices through any of the contact means available to us (e.g. phone, mobile or email), 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 MOBIPRO at any time by sending an email to info@mobipro.com.com.

7. Data Security

To protect your personal data held with us, we use industry-standard physical, procedural, and technical security measures, including encryption as appropriate. However, please be aware that regardless of any security measures used, we cannot and do not guarantee the absolute protection and security of any personal data stored with us or with any third parties.

8. Data Subject Rights

If you wish to exercise your privacy rights under applicable law (including the EU or UK GDPR, Swiss Federal Data Protection Act or the CCPA), such as (each to the extent applicable to you under the laws which apply to you) – the right to know/request access to (specific pieces of personal data collected; categories of personal data collected; categories of sources from whom the personal data was collected; purpose of collecting personal data; categories of third parties with whom we have disclosed personal data), to request rectification or erasure of your personal data held with MOBIPRO, or to restrict or object to such personal data’s processing (including the right to direct us not to sell your personal data to third parties now or in the future), or to obtain a copy or port such personal data, or the right to equal Services and prices (e.g. freedom from discrimination) – please contact us by email at info@mobipro.com.

You may designate an authorized agent, in writing or through a power of attorney, to request to exercise your privacy rights on your behalf. The authorized agent may submit a request to exercise these rights by emailing us. In such cases, we may request further information to verify such power of attorney and authorization.

Please note that when you ask us to exercise any of your rights under this Privacy Policy or applicable law we may require additional information and documents, including certain personal data and credentials in order to process your request in a proper manner (e.g. in order to authenticate and validate your identity so that we know which data in our systems relates to you, and where necessary, to better understand the nature and scope of your request). Such additional information will be retained by us for legal purposes (e.g. as proof of the identity of the person submitting the request, and of how each request was handled)

We may redact from the data which we made available to you any personal or confidential data related to others.

9. Data 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 “data controller” (or under the CCPA, “business”), who determines the purposes and means of processing; and the “data processor” (or under the CCPA, “service provider”), who processes such data on behalf of the data controller (or business). Below we explain how these apply to our Services, to the extent that such laws and regulations apply.

MOBIPRO LLC is the “data controller” of its Prospects’, Users’, Technology Partner’s and Customers’ personal data, as detailed in Section 1 above. Accordingly, we assume the responsibilities of a data controller (solely to the extent applicable under law), as set forth in this Privacy Policy.

Our Customers are solely responsible for determining whether and how they wish to use our Services, and for ensuring that all individuals using the Services on the Customer’s behalf or at their request, as well as all individuals whose personal data may be included in Customer Data processed through the Services, have been provided with adequate notice and given informed consent to the processing of their personal data, where such consent is necessary or advised, and that all legal requirements applicable to the collection, use or other processing of data through our Services are fully met by the Customer..

If you would like to make any requests or queries regarding personal data we process on Customer’s behalf, including accessing, changing or deleting your data, please contact us.

10. Additional Notices

Updates and Amendments: We may update and amend this Privacy Policy from time to time by posting an amended version on our Services. The amended version will be effective as of the date it is published. When we make material changes to this Privacy Policy, we will give notice as appropriate under the circumstances, e.g., by displaying a prominent notice within the Services or by sending an email. Your continued use of the Services after the changes have been implemented will constitute your acceptance of the changes.

US State Law Requirements: This Privacy Policy describes the categories of personal information we may collect and the sources of such information. We also included information about how we may process your information which includes “business purposes” We do not sell your personal information for the intents and purposes of CCPA. We do share and disclose personal data to third parties when third parties are authorized Service Providers or allow them to collect personal data from our Services, if those third parties are authorized Service Providers or business partners who have agreed to our contractual limitations as to their retention, use, and disclosure of such personal data, or if you integrate the Services of third parties with our Services, or direct us to disclose your personal data to third parties.

If you have any questions, you can contact info@mobipro.com.

Third Party Websites and Services: Our Services include links to third party websites and services, and integrations with Third Party Services. Such websites, services and Third-Party Services, and any information you process, submit, transmit or otherwise use with or to such websites, services, 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 websites, services, and Third-Party Services.

Our Services are not directed to 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 pertaining to such a child. If you believe that we might have any such data, please contact us by email.

Questions, concerns or general complaints: If you have any comments or questions regarding our privacy policy or practices, or if you have any concerns regarding your personal data held with us, or if you wish to make a complaint about how your personal data is being processed by MOBIPRO, please contact support at support@mobipro.com

