PRIVACY NOTICE FOR JOB CANDIDATES

At eToro, we are committed to protecting the privacy and security of your personal information. This privacy notice (the "**Notice**") describes the ways that eToro ("**Company**", "**we**", "**us**", "**our**"), collects, uses, stores, and disclose your personal data as a candidate ("**you**" or "**candidate**") and our recruitment process.

We strongly urge you to read this notice and make sure that you fully understand and agree to it. If you do not agree to this notice, please refrain from providing us with your data.

You are not legally required to provide us with any personal data, but without it we may not be able to process your application.

Please note that this Notice is provided only for transparency purposes. If you have any questions related to your personal data, you should contact the Company directly. We may have an additional privacy notice(s) explaining our own specific privacy practices related to your personal data ("**Company Notice**"). The Company Notice can be found at www.etoro.com.

1. What Data do we collect and how do we collect it?

eToro is the data controller responsible for your personal data. Our head office is located at 30 Derech Sheshet Ha'Yamim, Bnei Brak, Israel, and you can contact our Data Protection Officer by email at privacy@etoro.com.

We work with data processors to whom we have instructed to collect, store and process personal information on our behalf for the purposes of providing our services, for example, Comeet, as a recruiting and applicant tracking platform ("**Platform**") in order to handle your personal data as a candidate.

Throughout the application and recruitment process, we may receive, collect or have access to personal data about you as a candidate for positions at the Company, such as:

(a) Biographical information, such as name, date of birth, professional history, references, language, proficiencies, professional qualifications, training records, technical skills, education details, military or reserve status (where relevant to ensure our compliance with our legal obligations under applicable law), information about your company biography, social media profile and activity and your photos;
(b) Contact information, such as your home address, telephone number, email address, and social media handles and activity;
(c) Identification information, such as your social security number, government issued identification information (e.g., driver's license, passport), photographs or other similar identifiers;
(d) Performance information, such as candidate evaluation metrics, interview notes, performance evaluation and feedback, and recommendations;
(e) Information about related persons, as relevant;
(f) Nationality and immigration status, and other information such as residency and work permit status, to allow us to verify your employment eligibility;
(g) Recording and other content such as video and voice recordings of calls and meetings you participated in, transcripts of such recordings, and any email correspondence, notes or communications captured or submitted to us via any communications methods;

(h) Information required to accommodate personal needs, potential disabilities, or health-related conditions, to ensure our compliance with our legal obligations under applicable law;
(i) General video footage from our CCTV security system;
(j) Health care and medical information, such as any health information required for us to ensure a safe place of work and comply with government guidelines and public health advice to prevent the spread of diseases (in certain regions, subject to applicable law);
(k) Other information you provide to us, such as your feedback and survey responses where you choose to identify yourself.

2. For what purposes do we use your data?

We will use your personal data in accordance with our Company Notice (if any available to you), including to evaluate and consider you as a candidate for positions, in accordance with its processes and policies for evaluating employment candidates, to contact you for your candidacy status and interviews, to schedule meetings and interviews, amongst others.

The lawful bases we rely on for processing personal information are (if applicable to us under privacy law):

1. You gave us your consent to the processing of your personal data (for one or more specific purposes);

2. Processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract;

3. Processing is necessary for the purposes of the legitimate interest; and/or

4. Processing is necessary for compliance with a legal obligation to which the controller is subject.

If you have questions about these uses, please contact us. Please note that the legal basis is provided for GDPR purposes only.

3. Who will have access to your data?

We may share your personal data with our affiliates, service providers and vendors who assist us to collect, process and store your personal data, including, Comeet (who provide us with the Platform) in the context of your candidacy. These companies are authorized to use your personal data as necessary to provide these services or as otherwise authorized by us. Comeet's privacy policy is available here. We may share or transfer your personal data to the following:

1. our affiliated corporate group entities (entities controlled by, under common control with, or controlling us, directly or indirectly).

2. third parties who submitted your candidacy to us.

3. if your details are submitted to the Company by a third-party (such as an employee of the Company or a recruiting agency), the Company can give the third-party access to some of the general recruitment status.

4. if you apply to a job opening using a unique referral link that was provided to you by an employee of the Company to which you are applying, the Company may share some of your general recruitment status with the person that provided you the referral link.

The purpose of sharing the above information is to operate incentive programs (i.e. employee referral bonus programs) of the Company and to provide feedback to third-parties who submit candidates to the Company regarding their submission.

5. if we are required to disclose your information by a judicial, governmental and/or regulatory authority to comply with applicable laws, regulations and rules (including, without limitation, federal, state or local laws), and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order.

6. if, in the future, we sell or transfer, or we consider selling or transferring, some or all of our business, shares or assets to a third party, we will disclose your personal data to such third party (whether actual or potential) in connection with the foregoing events.

7. In the event that we are acquired by, or merged with, a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer, disclose or assign your personal data in connection with the foregoing events, including, in connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or to another company.

If you wish to receive further information, please contact us.

We host your personal data in connection with our use of the Platform either in the European Economic Area, in the US, in the country where we are located, or in countries deemed as providing an adequate level of data protection.

Your data will be accessible in the country where we or our service providers are located, the UK, the US, and countries deemed as providing an adequate level of data protection.

See here information regarding Comeet's vendors. For more information, please contact us.

4. For how long will the data be saved?

We keep your personal data as long as your candidacy for a position at eToro is being considered. In addition, we will retain your data for a maximum period of three years after the application for the position has ended, except where a different retention period is required by applicable law.

We retain your information for a few reasons, for example: to reconsider Candidates for other positions and opportunities at eToro (subject to the candidate's consent, where required by law); to use a Candidate's personal data as reference for future applications submitted by them; in case the Candidate is hired, for additional employment and business purposes related to their work; and as reasonably necessary to comply with our legal obligations, claims and\or dispute resolution, prevention of fraud and abuse, enforcement of agreements or otherwise protecting eToro's legitimate interests, all in accordance with our internal data retention policy.

If you do not want us to retain your information for consideration for other roles, or want us to update it, please contact us.

Please note that except as required by applicable law, we will not be obligated to retain your personal data for any particular period, and we are free to securely delete it for any reason and at any time, with or without notice to you.

5. How will we retain and secure your data?

We implement industry standard measures to reduce the risks of damage, loss, unauthorized access, or use, of our candidates' personal data. We also regularly seek new ways and tools for further enhancing the security of our system and the integrity of the personal data that we hold. Please note, however, that regardless of the measures we take and the efforts we make, we cannot and do not guarantee the absolute protection and security of any personal data stored with us.

6. How can you exercise your rights in relation to your data?

Your rights may vary, depending on the applicable law. These rights may not be available in certain jurisdictions and/or may be subject to certain derogations or limitations. You may have the following rights:

1. To ask us to receive a copy of your personal data that is stored on our servers, including the Platform;
2. to update, correct and/or delete your personal data;
3. to request the restriction of processing concerning your personal data or to object the processing of your personal data;
4. to request to obtain a copy of your personal data in a structured, commonly used and machine-readable format;
5. If we rely on consent, please note that you have the right to withdraw consent at any time; and/or
6. to lodge a complaint with a supervisory authority.

If you wish to exercise any of these rights, please contact us. If you choose to exercise any of your rights, we will handle these requests in accordance with applicable law but please note that exercise of some of those rights may have some consequences in your application as a candidate.

Please note that we may require additional information, including certain personal data, to authenticate and validate your identity and process your request. Such additional data will be then retained by us for legal purposes (e.g. as proof of the identity of the person submitting the request), in accordance with **Section 4** above. Please also note that such rights are not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all the personal data that we hold about you. If we cannot accommodate your request, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

7. Will this Notice be updated?

From time to time, we may change or update this Notice to reflect changes in our privacy practices. If we do so, we will make efforts to notify you of such changes by any means (including via this page or any of the communication means you provided us with). We encourage you to periodically review this page for the latest data on our privacy practices.

8. What if you have any questions?

If you have any questions regarding this notice, our data practices or the security of our job application processes, you can contact us at: privacy@etoro.com.

Data Protection Officer: We have appointed a Data Protection Officer, for monitoring and advising on our ongoing privacy compliance and serving as a point of contact on privacy matters for data subjects and supervisory authorities. If you have any comments or questions regarding our Job Candidate Privacy Policy, if you have any concerns regarding your privacy, or if you wish to make a complaint about how your personal data is being processed by eToro, you can contact us at privacy@etoro.com.

If your question relates to our representatives in the EU or UK, we will forward the request accordingly.