

**Last Updated: April 14, 2023**

Oxagile LLC and its affiliates (together "Oxagile", "we" or "us") respect the privacy rights of our visitors and users and are strongly committed to protect their privacy. This Privacy Policy applies to website career.oxagile.com ("this Site"), your interaction with us on social media in connection with information collected when you use this site under your interest in career opportunities at Oxagile, but doesn't apply to any other websites, products or services of Oxagile, unless otherwise expressly indicated by us.

You represent, warrant and covenant that you are at least eighteen (18) years old. Provision of personal information through this Site and otherwise in connection with your interest in career opportunities at Oxagile by any individual under the age of eighteen (18) is strictly prohibited.

## **Collection and Use of Your Personal Information**

We, or where relevant designated service providers (information about them can be found below and in this [Cookie Policy](#)), collect personal information that you choose to provide or we receive from other sources. This may include personal information you provide through this Site, on third-party websites, through interacting with the Site, by submitting your resume or CV, etc. There is no statutory or contractual obligation requiring you to provide your personal information to us. The provision of your personal data is voluntary for you. If you do not provide certain personal information, not all functionality on this Site will be available, and we may not be able to fully consider your suitability for current and future employment.

We process your personal information where applicable (a legal basis):

- to comply with Oxagile's legal obligations (including maintaining records);
- guided by overriding legitimate business interests of Oxagile (e.g., to assess your experience and qualifications, to make sure that the position we offer you suits you the best). Oxagile's interest shall not be overridden by your fundamental rights or interests;
- based on your consent (explicit, clear, informed and unambiguous).

## **The Information We Collect**

We, or where relevant designated service providers, may obtain (some or all) the following types of personal information:

- First name and last name
- Pictures of you
- Date of birth, citizenship, nationality and other information, which might include characteristics of protected classifications, such as your gender, disability status. Disclosure of this information is completely voluntary
- Email address, postal and residential address, account names, telephone number and usernames (online identifiers) in messengers or other contact information
- Levels of languages spoken
- Education history (including universities and other institutions names) and graduation dates, certificates of courses

- Professional, industry, employment-related information including work authorization status and “hard skills”
- Your professional interests, self-representation (including “soft skills” and portfolio) information and achievements
- Your resume or CV
- Internet Protocol address or other similar identifiers
- Internet or other electronic network activity information
- Geolocation
- Other information that is not specifically listed here but you give to us voluntarily with your consent

Personal information is obtained directly from you (e.g. entered by you in contact us form), from others authorized to provide information, from activity on the Site and from other parties with whom we work and/or interact (such as service providers and social networks). We may also contact your previous employers, colleagues and referees when it is necessary to complete, clarify or confirm the information about you.

Do not provide information about others unless you are authorized to do so and consent to have all information used, disclosed and transferred in accordance with this Privacy Policy. By submitting information about others, you represent and warrant that you are authorized to do so, and that you have received authorization from the person about whom you are providing information, and that person has consented to have all information used, disclosed and transferred in accordance with this Privacy Policy.

If you choose to provide us with a link to third-party sources of information about you, please note that we may obtain personal information about you from such sources.

If you choose to provide any sensitive personal information or special category data (including but not limited to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation) in connection with your application, you expressly consent to the use, processing and disclosure of such sensitive personal information or special category data for the purposes for which you provide it.

You understand and agree that your submission of information does not obligate us to conduct an interview with you, employ you or offer you employment. If you are offered a position of employment at Oxagile, certain personal information submitted in your application may be made available in an internal employee directory or other tool for business-related purposes.

## **The Purposes of Information Collection**

We use this information for carefully considered purposes which also benefit our customers and which include some or all of the following:

- to provide information on open positions and internships
- to plan and form the base of candidates
- to communicate with you
- to share information with our customers

- to make the final decision on hiring you (decision-making is not automated, decisions are made exclusively by our specialists)
- to provide you with a job offer or an internship offer that may be of interest to you
- to help us improve, upgrade or enhance the Site and our activities in the field of human resources
- to maintain the quality and safety of this Site and for the internal quality control purpose
- to enhance your experience with this Site, including to save your preference information, create hashed identifiers that can be used to help us identify you on our site and third-party sites, provide customized content on our site
- to analyze the use of this Site, protect the interests, rights, safety or property of Oxagile or others, monitor compliance with and enforce the terms of any agreement with us
- to monitor in order to detect security incidents, protect against malicious, deceptive, fraudulent or illegal activity and hold those responsible for that activity

Oxagile does not process your personal data for automated decision-making, including profiling. For case where automatic processing is performed, we will inform you additionally.

You may instruct us at any time not to use your personal information covered by this Privacy Policy and not to provide you with offers by clicking [here](#). Please note that if you exercise choice in this manner, you will continue receiving communications concerning your requests, and in response to any requests for information by you.

## **Use of Cookies and Other Similar Technologies**

We and the parties with whom we work (e.g., service providers, etc.) use cookies, web server logs, web beacons, pixels or other electronic technologies to collect statistical and other information about you, learn how you interact with our content and improve your experience when visiting the Site. You may find out more about cookies we use in this Site's [Cookie Policy](#).

We also place social media buttons on some pages to let you share the content which you liked with others.

## **Advertisements**

We, our designated service providers, or third-party advertisers or their advertising servers may also place or recognize unique cookies on your computer or use other electronic technologies in order to help display advertisements that you see on this Site or on other websites.

Some third-party websites and platforms also allow you to manage the collection and use of your information for advertising purposes. Google Ad Manager, Google Analytics for Display Advertising and other designated service providers assist us with related analytics for this Site.

Note that even if you exercise choice for targeted advertising, you will still receive online advertising.

## **Disclosure of Your Personal Information**

We may share your personal information with our affiliates (including affiliated websites under common ownership or control) and designated service providers for the purposes set out in this Privacy Policy. We may also disclose to third parties, including advertising networks, data analytics providers and social



networks, your use of our or other websites, including online identifiers, Internet Protocol address, Internet or other electronic network activity information, and the services provided by us for the purposes set out in this Privacy Policy. We may disclose your personal information with other third party ("Third-Party Provider") that provides you with offers that may be of interest to you. You may instruct us at any time not to share your personal information covered by this Privacy Policy with such Third-Party Providers by [mailing](#).

We may also disclose your personal information to legal authorities, service providers, contractors, vendors, consultants, agents, partners or other unaffiliated third parties if we believe in good faith that such disclosure is necessary to: (a) comply with any applicable law, rule or regulation or in response to a subpoena, court order or other legal process; (b) protect the interests, rights, safety or property of Oxagile or others; (c) monitor compliance with and enforce any terms of service on this Site; (d) operate and analyze our systems and services properly; (e) make a decision on hiring you or fulfil other purposes stipulated hereby.

When you submit a request via a contact form, our website creates an email which is then sent to our company. Our emails are served by and stored at Microsoft Office 365.

The collection, further use and/or disclosure of your information by Third-Party Providers or by other third parties are not the responsibility of Oxagile. Rather, such collection, use and/or disclosure are governed by the third parties' privacy policies.

## **Accuracy, Security, and Retention of Your Personal Information**

Throughout the life cycle of any personal information processing, Oxagile will ensure that the collected data remains accurate and up to date. Every reasonable step will be taken to ensure that personal information that is inaccurate is erased or rectified without delay.

Any personal information you provide to us is kept on secure servers. We use security measures appropriate to the provision of the relevant product or service, such as reasonable administrative, technical, personnel and physical measures (a) to safeguard personal information against loss, theft, unauthorized use, disclosure or modification; and (b) to ensure the integrity of personal information. We are certified with ISO27001 and regularly updated to comply with industry standards. Personal information is retained for as long as is necessary for the purpose for which it is collected, including legitimate business reasons and/or legal and regulatory requirements.

If we do not employ you at this time, we may retain and use the information that we obtain as part of your application process so as to be able to consider your application later if a suitable position becomes available, for general statistical analysis and reporting purposes, for legal or regulatory purposes, for other purposes set out in this Privacy Policy and, if appropriate, to refer back to this application if you apply again. We will store your information for five (5) years from the date we got it (to be able to offer this or a similar vacancy again). If at any time you no longer want us to consider your application, please let us [know](#).

## **Rights With Respect to Your Personal Information**

Depending on the legal regulations in your country and the applicable laws to which you are subject, you may have all or some of the following rights set out below:

**Right of access:** the right to obtain from us confirmation as to whether your personal information is

being processed, and, where that is the case, to request access to your personal information. You may have the right to obtain a copy of your personal information undergoing processing. For additional copies requested by you, we may charge a reasonable fee based on administrative costs.

**Right to rectification:** the right to obtain from us the rectification of inaccurate personal information concerning you.

**Right to erasure (right to be forgotten):** the right to ask us to erase your personal information, in which case we have to comply.

**Right to restriction of processing:** the right to request the restriction of processing your personal information.

**Right to object:** you may have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal information by us, and we can be required to no longer process your personal information unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

**Right to data portability:** the right to receive your personal information which you have provided to us in a structured, commonly used and machine-readable format and you may have the right to transmit that personal information to another entity without hindrance.

**Right to withdraw consent:** If you have declared your consent for any personal information processing activities, you have the right to withdraw this consent at any time with future effect. Such a withdrawal will not affect the lawfulness of the processing prior to the consent withdrawal. This right to withdraw consent applies in particular to consents given for marketing and profiling purposes, if any.

**Right to lodge a complaint with the competent data protection authority** in your home country or in the United States.

Please bear in mind that if you exercise such rights, this may affect our ability to provide our information and offers and to consider your suitability for current and future employment. For requests about your personal information, please contact us by clicking [here](#). While we will make reasonable efforts to accommodate your request, we also reserve the right to impose certain restrictions and requirements on such requests, if allowed or required by applicable laws.

## Your California Privacy Rights

In addition, if you are a California resident, you may have the right, consistent with this Privacy Policy and applicable laws, to request:

- certain information about our collection, use, sale or disclosure of your personal information
- deletion of your personal information collected or maintained by us
- an opt-out from the sale of your personal information

You also have the right to not receive discriminatory treatment for exercising these rights.



If you choose to exercise these rights, we ask you to provide sufficient information, including your state and country of residence and contact information, in order for us to verify your identity and process your request. The California Policy applies solely to personal information we have collected from individuals who are residents of the State of California in the twelve (12) months preceding the date on which the California Policy was last updated. Depending on the types of requests, additional information may be requested.

You may use an authorized agent to submit a request related to your personal information on your behalf. If you choose to use an authorized agent, you should supply your agent with written permission to act on your behalf in relation to your request, and your agent must provide us with proof of such authorization before we process your request.

We do not sale nor share personal information (including sensitive) as defined under applicable California law.

To exercise the right related to your personal information, please contact us by clicking [here](#).

We use and share your personal information and sensitive personal information as described in this Privacy Policy, and our disclosures of your personal information as described in this Privacy Policy do not constitute a sale under the California Consumer Privacy Act of 2018, as amended.

If you are a California resident, California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your personal information by Oxagile to its affiliates and/or third parties for their direct marketing purposes.

To make such request, please [send an email](#) with information needed to identify you.

You may also make such a request by writing to us at:

Oxagile LLC, 165 Broadway, 23rd Floor, New York, NY 10006, USA

## **Transfer of Your Personal Information to Other Countries**

Oxagile operates globally. This site is located in the United States, so that is where all data collection happens. The data which is collected and/or served by 3<sup>rd</sup> party providers (Google, Meta, LinkedIn, Microsoft) may be transferred to different countries worldwide for data processing. Such countries may have different (in particular less stringent) levels of privacy protection than your country or country in which the information was originally collected. By submitting your personal information, you consent to such transfers and processing, including to and in the United States. We implement appropriate safeguards, which may include but are not limited to European Commission standard data protection clauses and other data transfer agreements, that require the recipients to provide the same level of protection, to protect your personal information that is transferred.

## **Links to Third-Party Services**

We may provide links or access to third-party websites or other digital properties, including social networking websites. These websites operate independently of Oxagile and are not covered by our Privacy Policy. Since we do not control third-party digital properties and are not responsible for any information you may provide while on such digital properties, we encourage you to read the privacy policies on those websites before providing any of your information on such digital properties. We are



not liable for data processed by third-party websites and cannot guarantee your safety when interacting with them.

### **Questions Regarding This Privacy Policy**

If you have questions regarding the interpretation or operation of this Privacy Policy, please send an email. Or contact Oxagile's data protection specialist at 165 Broadway, 23rd Floor, New York, NY 10006, USA. If you have complaints about Oxagile's processing of your personal information, you may have the right to contact the applicable supervisory authority.

### **Modifications to This Privacy Policy**

We reserve the right to change this Privacy Policy at any time by indicating revisions through the "Last Updated" date at the top of the Privacy Policy and such changes will be effective upon posting. We will ensure that you are notified of any material changes to this Privacy Policy promptly, through appropriate method of communication. You are advised to review this Privacy Policy periodically for any changes.