

Privacy Policy

Thank you for visiting DHVMED's Website or interacting with us via e-mail.

In the event that DHVMED IT Ltd or any of its affiliates (together hereinafter: "**DHVMED**") asks you for any information, you are hereby advised that we are committed to collecting, maintaining, and securing personal information about you in accordance with the applicable Privacy Policy below (this "**Privacy Policy**"), as well as applicable laws, rules and regulations. This Policy applies to personal information (as defined below) collected from DHVMED online resources and communications (such as this Website, via e-mail, and other online tools) that display a link to this Policy. This Policy does not apply to third-party online resources to which DHVMED's Website may link, where DHVMED does not control the content or the privacy practices of such resources.

If you are NOT a resident of the EU/EEA, the following privacy policy will apply to you. If you ARE a resident of the EU/EEA, please refer to our EU Privacy Policy

Data gathering

- Data on the Site are submitted by you voluntarily, and in some cases data may be collected automatically. Some of the data collected include information that can be reasonably used to identify you, including your first and last name, your home address and/or email, your phone number, location, etc. ("Personal Information").
- The gathering of Personal Information from the Site is carried out in two ways:
 - Directly, for example, when you provide information to sign up for the newsletter, to receive services, or when you address various inquiries to us, or fill out forms.
 - Indirectly, through the technology of the Site, such as your IP address, the pages you are viewing on this site, your operating system and browser type.

Reasons for gathering data

- We use Personal Information to provide you with the information you request, for the purpose of online applications, for other purposes that will become clear to you or that are described at the time of data collection and for any other purpose set forth in these Terms of Use.
- We analyze information related to the IP address to determine what is most effective about the Site and to help us identify ways to improve and optimize the Site.

Data storage and usage

- We store Personal Information, as needed to provide services to you, and occasionally, for a longer period, as required by law. We may collect, inter alia, the following information types: given name and surname, address and/or email, phone number, location, conference registration details, details you filled in "contact us", etc.
- DHVMED uses the Personal Information only in ways that are consistent with the objectives for which it was collected, and in accordance with our Terms of Use.
- Any information or content that you post on the Site in any form (which is not Personal Information), will not be considered proprietary or confidential, and all those exposed to it, including DHVMED, may use it in any way they see fit. It is clarified here that DHVMED and

anyone on its behalf are not liable or responsible whatsoever in connection with such information or content.

- Personal Information provided by you through the Site as a part of an application for a possible position ("Applicant Information") is needed to assess your suitability for jobs of interest. The service is provided to you based on the information you submitted, which will be stored in the DHVMED database in accordance with the requirements of the law, with DHVMED procedures, and with the provisions of the Terms of Use. DHVMED is entitled to transfer such information to third parties at your request and at its discretion, for its and/or your benefit. DHVMED is entitled to make the following use of Applicant Information: (1) use it for its administrative, business, and commercial purposes, including for contacting you, direct mailing, marketing and advertising campaigns, making job and/or course offers, by mail, telephone, fax, or electronic mail; (2) making it available to affiliated companies and/or third parties in order to obtain proposals for jobs/products/services that DHVMED believes may be of interest to you. If you request to be excluded from direct mailing lists and/or not to transfer your Applicant Information to third parties, as set forth above, you must request it from us by email or by registered mail, using the Contact Link that appears on the Site. In the absence of such a request, it will be considered that you consented for DHVMED to use your Applicant Information as described above.
- In addition to the foregoing, DHVMED may use the Personal Information provided by you for the purpose of big data analysis, machine learning and other artificial-intelligence processes, whether directly or through third parties on its behalf as well as in joint ventures, without time limitation. To the extent possible with respect to the purpose of such uses, DHVMED will apply reasonable anonymization measures to reduce the identification potential of such Personal Information.

International transfers of Personal Information

To the extent that we transfer Personal Information outside of Israel, such transfer is carried out in compliance with local privacy laws in relation to the collection, use, and saving of Personal Information. You are responsible for the processing of your Personal Information on third party sites or services (such as cloud service providers), including compliance of the data with applicable regulation, even if you asked us to upload the information for you or on your behalf.

Your rights

- DHVMED allows you to use the Site and the services contained therein that are offered by it, for personal, non-commercial use only, subject to the Terms of Use.
- You are entitled to know whether we hold Personal Information about you, and you may review your Personal Information and correct inaccuracies, subject to the law.
- **Third parties services and effect** This Privacy Policy applies only to data collected by us and for our use.
- A portion of the services on the Site (such as the search engine), are managed by products and content suppliers of DHVMED. These services are provided in accordance with the terms and conditions of such suppliers and not by DHVMED computers. When using these services, you may be requested to provide Personal Information, or such information may be collected about you. Use of this information is subject to the privacy policies of such suppliers, and not to the DHVMED Privacy Policy, therefore we recommend that you review, when applicable, these privacy policies as well.

Protecting your Personal Information

DHVMED respects the privacy of users of its Sites. Below is a review of how we use the information you provide or that is collected about you during your use of the Site.

- Disclosure
 - We do not sell, trade, or disclose to any third party Personal Information derived from the use of the services or from visiting the Site.
 - Notwithstanding the above, it is possible that we will transfer Personal Information to our service providers, some of whom are outside of Israel, including jurisdictions that do not provide the same level of protection of personal information as provided in Israel, and you agree to such transfers, as may be required. In this case, we make sure that your Personal Information will be adequately protected, in accordance with the law and our internal policies.
 - Additionally, certain exceptions may apply, among others, if the disclosure is required by law or if it is necessary to protect the rights, property, or safety of DHVMED, of our clients, or of third parties, if the Personal Information is publicly available, or if such disclosure is reasonably necessary.
- Security
 - We implement on our Site information security systems and procedures and continue to improve them in accordance with the availability of appropriate new technologies. These systems and procedures reduce the risk of unauthorized entry to DHVMED computers, but do not provide absolute security. Therefore, DHVMED does not guarantee full security of the services provided on the Site and is not responsible for unauthorized access of the data stored on it.
 - The site may contain links to and from the sites of third parties. Following these links leads to third-party sites operating under different terms of use and privacy policies from those of DHVMED, and DHVMED has no responsibility or obligations with respect to these sites, their content, their visual elements, the data found there, or the policies that apply to them.

Regulation

- DHVMED observes the privacy laws of Israel in relation to personal data you provided on the site.
- From time to time we verify that our Privacy Policy conforms to the relevant privacy laws.

Monitoring

- The Site uses “cookies” for a variety of purposes, including for the routine and proper operation of the Site, as well as to collect statistical data about its use, to verify information, to adapt the Site to your personal preferences, and for the purpose of information security. Cookies are text files that your browser creates according to commands from DHVMED computers.
- Some cookies expire when you close your browser; others are saved on the hard drive of your computer.
- Deleting and blocking cookies will affect your use of the Site, and portions of it may not work.
- We may use web beacons or other monitoring technologies.

- You cannot remove these monitoring technologies, which are part of the Content of Web pages. But in cases they work with cookies, cancelling the cookies will prevent monitoring your user activity on the Site, in other words, although the web beacons continue to monitor your use as an anonymous visitor, your personal information is not recorded.

Targeted email

- We may occasionally send you email containing information about our services, as well as marketing and advertising information on our behalf or on behalf of third parties, and you hereby agree to receive such marketing information from us.
- You can choose to cancel at any time receiving such commercial information by contacting us through the Contact Link, but you may not choose to cancel the receipt of service messages or other communications required as part of our services.

Updates to Privacy Policy

From time to time, DHVMED may revise this Privacy Policy. Any such changes to this Privacy Policy will be promptly communicated on this page. Continued use of our Website after receiving notice of a change in our Privacy Policy indicates your consent to the use of information provided to DHVMED in accordance with the amended DHVMED Privacy Policy.

EU Privacy Policy

This Policy applies to you if you are an EU/EEA resident.

How We Collect and Use Information

a) Information for Customer Support and Inquiries

We collect and store personal information, such as name, company, address, email address, telephone number, business affiliation and contact information, when you submit inquiries or requests with respect to our products or services, or when you contact us for the purpose of purchasing products and services. We will use such information to contact you only for the purposes for which you sent the inquiry.

b) Information for Marketing and Promotional Purposes

We also collect and store personal information, such as name, company, address, email address, telephone number, business affiliation and other contact information, if you subscribe to our newsletter or wish to attend our events, for the purpose of sending you product information, marketing, business and promotional materials or information on our future events. We do so only if you have given your explicit, free and informed consent for such purposes. In line with the GDPR we will always give you the opportunity to opt in to our mailing list and without your consent we will not add you to our mailing list to receive direct marketing or market research information.

c) Information for the maintenance and Improvement of our Website and Services

We may also use your personal information, such as web server logs, IP addresses, cookies and web beacons, when you send us inquiries regarding our products or when you browse the Website, to administrate and improve this Website or our products and services, for our internal records and for statistical analysis.

d) Cookies

This Website may also collect cookies subject to our Cookie Policy available at <https://www.dhvmed.com/dhvmed-cookie-policy/>

Legal Basis for Processing

Our collection and processing of personal information is based on the following:

- a) Need to carry out the above processing of information, which is in anticipation of entering into commercial engagements or as part of the performance of existing engagements with you or the organization you work for.
- b) To the extent that we use the personal information for advertising or promotional activities, we will request your specific, freely-given, unbundled, informed and separate consent to such uses.
- c) To the extent that we use the personal information to improve this Website or for analysing statistics, the basis for collection of data is our legitimate interest to conduct such improvements and analysis.

Your Choices

You have several choices regarding your use of our Website. You could decide not to submit any personally identifiable information at all by not entering into any forms or data fields on our Website and not using any available personalized services. We may ask for your permission for certain uses of your information and you can agree to or decline those uses. If you opt-in for particular services or communications, such as an e-newsletter, you will be able to unsubscribe at any time by following the instructions included in each communication.

Data Security

DHVMED uses technology and security precautions, rules and other procedures to protect your personal information from unauthorized access, improper use, disclosure, loss or destruction. To ensure the confidentiality of your information, DHVMED uses also industry standard firewalls and password protection, taking into consideration the state of the art technology, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of processing your personal information. It is, however, your personal responsibility to ensure that the computer you are using is adequately secured and protected against malicious software, such as trojans, computer viruses and worm programs. You are aware of the fact that without adequate security measures (e.g. secure web browser configuration, up-to-date antivirus software, personal firewall software, no usage of software from dubious sources) there is a risk that the data and passwords you use to protect access to your data, could be disclosed to unauthorized third parties.

Data Sharing and Transfer

DHVMED shares personally identifiable data about you with various outside companies or agents doing technological maintenance or working on our behalf to help fulfill business transactions, such as providing customer services, and sending marketing communications about our products, services and offers. We may also share personally identifiable data with our company's subsidiaries and affiliates. All these companies and agents are required to comply with the terms of our privacy policies.

More specifically, we may send your personal information to other companies or people under any of the following circumstances:

- a) When we have your consent to share the information;

- b) When we need to send the information to companies who work on behalf of DHVMED to provide a product or service you have requested as part of our contractual relationship (we will only provide those companies the information they need to deliver the product or service, and they are prohibited from using that information for any other purpose);
- c) In the event of sale or transfer of all or substantially all of DHVMED or any DHVMED affiliate's shares or assets, in cases of mergers or in case of negotiations with respect to the foregoing;
- d) To our service providers and subcontractors in order to keep you up to date on the latest product announcements, services updates, special offers or other information we think you'd like to hear about either from us or from our business partners (unless you have opted out of these types of communications), only if you gave your explicit, free and informed consent to such processing activities, as detailed above.
- e) To respond to appropriate requests of legitimate government agencies or where required by applicable laws, court orders, or government regulations; or
- f) Where needed for corporate audits or to investigate or respond to a complaint or security threat.

We will not sell or otherwise transfer the personally identifiable information you provide to us at our Websites to any third parties for their own direct marketing use unless we provide clear notice to you and obtain your explicit consent for your data to be shared in this manner.

For the above purposes, personal information may be transferred to recipients in countries around the world (which may be located outside the EU/EEA, European Economic Area) which in some cases may have a lower level of protection than that within the EU/EEA. When transferring personal data to countries outside the EU/EEA, to jurisdictions that did not receive an adequacy decision by the European Commission, we use standard contractual clauses approved by the European Commission to ensure a sufficient level of protection for your personal information. The standard contractual clauses can be found via the following link: http://ec.europa.eu/justice/data-protection/international-transfers/transfer/index_en.htm.

Other than as described above, any other transfer of your personal information to third parties will be subject to your consent.

Data Retention

DHVMED stores the personal information as long as it is necessary to fulfil the purpose for which the data has been collected. This means that DHVMED deletes your personal information when such information is no longer necessary. Statistics which has been anonymised may be saved thereafter.

Data Subject Rights

You may at any time request the rectification or erasure of your personal information. Please note however that deletion could mean that DHVMED cannot process your requests or provide you any requested services. You have the right to request a copy of your personal information from our record. You have the right to request a limitation of the use of your personal information (for example if you deem the information to be incorrect) or the termination of use of your personal information (for example as regards the use of the information to improve our services).

Links to Other Sites

Our Website contains links to a number of websites that may offer useful information to our visitors. DHVMED does not share your personal information with those websites and is not responsible for their privacy practices. It should be clarified that this Privacy Policy does not apply to those websites, and we recommend communicating to them directly for information on their privacy policies. Some

of these third-party websites may have permission to include the DHVMED logo, even though they are not operated or maintained by DHVMED. Although we choose our business partners carefully, DHVMED is not responsible for the privacy practices of websites operated by third parties that are linked to our site. Once you have left our Website, you should check the applicable privacy policy of the third party website to determine how they will handle any information they collect from you.

Privacy Policy for Children

Our Website is directed to an adult audience. We do not collect any personally identifiable information from anyone we know to be under the age of 16 without the prior, verifiable consent of his or her legal representative. Such legal representative has the right, upon request, to view the information provided by the child and/or to require that it be deleted.

Updates to Privacy Policy

From time to time, DHVMED may revise this Privacy Policy. Any such changes to this Privacy Policy will be promptly communicated on this page. Continued use of our Website after receiving notice of a change in our Privacy Policy indicates your consent to the use of newly submitted information in accordance with the amended DHVMED Privacy Policy. The effective date of this Privacy Policy is May 10, 2018.

Privacy Inquiries

DHVMED is responsible for the processing of your personal information, and requests to exercise your rights as stated above shall be addressed to Matrix IT Global Services Bulgaria EAD, email address: GDPR-info@matrix-global.net

If you are a resident of the EU/EEA, and have a complaint regarding the processing of your personal information by DHVMED you are entitled to report such dissatisfaction to the applicable supervisory authority in your country of residence.

How to Contact DHVMED

For questions or if you wish DHVMED to amend or delete your personal information, please contact us in writing, as follows:

Matrix IT Global Services Bulgaria EAD, email address: GDPR-info@matrix-global.net

PRIVACY STATEMENT FOR JOB APPLICANTS

This privacy statement applies whenever you submit your personal information to DHVMED, or any of its affiliates, as part of a job application.

We respects your privacy and are committed to protect the personal information that you share with us. When you apply for a job with us or any of our affiliates we need your personal information to consider whether you are a good fit for relevant positions and to further contact you if the application process continues. This policy statement describes how we collect and use your personal information when you submit a job application.

Information We Collect

Personal information means any information that may be used to identify an individual, including, but not limited to, a first and last name, email address, a home, postal or other physical address, other contact information, title, birth date, gender, occupation, industry, personal interests, CV and other information you provide as part of a job application. In addition to the preliminary information you send us as part of the application, we may collect more information about you in personal interviews or through further communications to the extent applicable.

[Information We Receive from Third Parties

Instead of directly submitting your job application or personal information to us, we provide you with the ability to send such information using tools offered by third parties such as LinkedIn (when you decide to provide your CV by linking to your profile) or Comeet or other online recruitment services (when you subscribe for their job application services). Any information we receive from such third parties in the context of your job application is subject to this privacy statement and we will be the controllers with respect to such information. However, please note that by using such third party tools you may be required to review and consent to the privacy statements of such third parties and their use of your information will be subject to such privacy statements that we assume no liability for.

Legal Basis for Processing

Our collection and processing of personal information is based on our legitimate interest to seek new employees and consider job application and our need to carry out the above processing of information, which is in anticipation of the possibility of entering into contractual engagements with you.

To the extent that we use the personal information to consider you for new job openings in the future, we will request your specific, freely-given, unbundled, informed and separate consent to such uses, unless such consent has been previously given by you as part of previous job applications.

Information Sharing and Disclosure

Because we are a global company, your personal information may be shared with our other offices or affiliates around the world. All such entities are governed by this privacy statement or are bound by the appropriate confidentiality and data transfer agreements.

We may send your personal information to other companies or people under any of the following circumstances:

- a) we need to send the information to companies who work on our behalf to provide services directly related to the job application process, such as external assessment institutions (we will only provide those companies the information they need to assist us in the job application process, and they are prohibited from using that information for any other purpose);

- b) in the event of sale or transfer of all or substantially all of our or any of our affiliate's shares or assets, in cases of mergers or in case of negotiations with respect to the foregoing;
- c) if required to do so by law, or in urgent circumstances, to protect personal safety, the public or our website.

Other than as described above, any other transfer of your personal information to third parties will be subject to your consent.

For the above purposes, personal information may be transferred to recipients in countries around the world (which may be located outside the EU/EEA, European Economic Area) which in some cases may have a lower level of protection than that within the EU/EEA. When transferring personal data to countries outside the EU/EEA, to jurisdictions that did not receive an adequacy decision by the European Commission, we use standard contractual clauses approved by the European Commission to ensure a sufficient level of protection for your personal information. The standard contractual clauses can be found via the following link: http://ec.europa.eu/justice/data-protection/international-transfers/transfer/index_en.htm.

Data Retention

We store the personal information as long as it is necessary to fulfil the purpose for which the data has been collected. This means that we delete your personal information when such information is no longer necessary. For example, if you applied only to one job opening, we will delete your personal information within reasonable time after the application process end to the extent that you were not hired to work with us. If you applied for job openings generally, or if you agreed that we contact you for future openings, we will retain your personal information for longer periods in order to send you future information on job openings and consider you for further positions. Statistics which has been anonymised may be saved thereafter.

Data Subject Rights

You may at any time request the rectification or erasure of your personal information. Please note however that deletion could mean that we cannot process your job applications. You have the right to request a copy of your personal information from our record. You have the right to request a limitation of the use of your personal information (for example if you deem the information to be incorrect) or the termination of use of your personal information.

Data Security

We safeguard the security of the data you send us with physical, electronic, and managerial procedures, taking into consideration the state of the art technology, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of processing your personal

information. While we strive to protect your personal information, we cannot ensure the security of the information you transmit to us, and so we urge you to take every precaution to protect your personal data when you are on the Internet.

Changes to this Privacy Policy

We may amend this policy from time to time. If we make any substantial changes in the way we use your personal information we will make that information available by posting a notice on this site.

Privacy Inquiries

We are responsible for the processing of your personal information, and requests to exercise your rights as stated above shall be addressed to Matrix IT Global Services Bulgaria EAD, email address: GDPR-info@matrix-global.net

If you are a resident of the EU/EEA, and have a complaint regarding the processing of your personal information by us, you are entitled to report such dissatisfaction to the applicable supervisory authority in your country of residence.

PRIVACY STATEMENT FOR JOB APPLICANTS (RECRUITMENT SERVICES)

This privacy statement applies whenever you submit your personal information as part of a job application, for the purpose of using our recruitment services and being considered for relevant positions in one of our clients.

We respects your privacy and are committed to protect the personal information that you share with us. When you apply for a job using our recruitment services we need your personal information to consider whether you are a good fit for relevant positions and to further contact you if the application process continues. In this context we are the controllers of your personal information and process it for the purpose of conducting our job recruitment services.

This policy statement describes how we collect and use your personal information when you submit a job application.

If the recruitment process proceeds and we transfer your personal information to the potential employer who wishes to consider you for an open position, we no longer function as data controllers (nor as data processors), and this privacy statement no longer applies. Instead, the privacy statement of the potential employer will apply and you will directly engage with it for any privacy related issues.

Information We Collect

Personal information means any information that may be used to identify an individual, including, but not limited to, a first and last name, email address, a home, postal or other physical address, other contact information, birth date, gender, education, occupation, industry, title, personal interests, CV and other information you provide as part of a job application. In addition to the preliminary information you send us as part of the application, we may collect more information about you in personal interviews or through further direct communications.

Information We Receive from Third Parties

Instead of directly submitting your job application or personal information to us, we provide you with the ability to send such information using tools offered by third parties such as LinkedIn (when you decide to provide your CV by linking to your profile) or Comeet (when you subscribe for their job application services). Any information we receive from such third parties in the context of your job application is subject to this privacy statement and we will be the controllers with respect to such information. However, please note that by using such third party tools you may be required to review and consent to the privacy statements of such third parties and their use of your information will be subject to such privacy statements that we assume no liability for.

Legal Basis for Processing

Our collection and processing of personal information is based on your request to be provided with job recruitment services and our need to carry out the above processing of information in order to provide such services.

If your application is limited to a specific position, any use of your personal information in connection to other positions openings in the future, will be subject to your specific, freely-given, unbundled, informed and separate consent to such uses.

Information Sharing and Disclosure

As part of the nature of our services, your personal information may be shared with our other offices or affiliates around the world. Our affiliates are governed by this privacy statement or are bound by the appropriate confidentiality and data transfer agreements. We will be considered the controller of your personal information to the extent that the processing is related to the operation of our recruitment services. [Note: are the recruitment companies transferring data to other group companies?]

We may send your personal information to other companies or people under any of the following circumstances:

- a) we need to send the information to companies who work on our behalf to provide services directly related to the job application process, such as external assessment institutions (we

will only provide those companies the information they need in order to assist us in the job application process, and they are prohibited from using that information for any other purpose);

- b) in the event of sale or transfer of all or substantially all of our or shares or assets or the DHVMED Group's shares or assets, in cases of mergers or in case of negotiations with respect to the foregoing;
- c) if required to do so by law, or in urgent circumstances, to protect personal safety, the public or our website.

In addition, as inherently required by the services we provide, your personal information will be transferred to our clients (potential employers) as may be applicable and relevant in the context of your job application. Once we provide your personal information to one of our clients, we do not longer process your personal information on its behalf and therefore it becomes the controller of your personal information for the purpose of considering your application for the relevant position.

Other than as described above, any other transfer of your personal information to third parties will be subject to your consent.

For the above purposes, your personal information may be transferred to recipients in countries around the world (which may be located outside the EU/EEA, European Economic Area) which in some cases may have a lower level of protection than that within the EU/EEA. When transferring personal information to countries outside the EU/EEA, to jurisdictions that did not receive an adequacy decision by the European Commission, we use standard contractual clauses approved by the European Commission to ensure a sufficient level of protection for your personal information. The standard contractual clauses can be found via the following link: http://ec.europa.eu/justice/data-protection/international-transfers/transfer/index_en.htm.

Data Retention

We store the personal information as long as it is necessary to fulfil the purpose for which the information has been collected. This means that we delete your personal information when such information is no longer necessary. For example, if you applied only to one job opening, we will delete your personal information within reasonable time after the application process end. If you applied for job openings generally, or if you agreed that we contact you for future openings, we will retain your personal information for longer periods in order to send you future information on job openings and consider you for further positions. Statistics which has been anonymized may be saved thereafter.

Data Subject Rights

You may at any time request the rectification or erasure of your personal information. Please note however that deletion could mean that we cannot process your job applications. You have the right to request a copy of your personal information from our record. You have the right to request a limitation of the use of your personal information (for example if you deem the information to be incorrect) or the termination of use of your personal information. Please note that as we do not process your personal information on behalf of potential employers to which your information was transferred, if you wish them to fulfill any of your data subject rights, you will have to contact them with the relevant requests.

Data Security

We safeguard the security of your personal information with physical, electronic, and managerial procedures, taking into consideration the state of the art technology, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of processing your personal information. While we strive to protect your personal information, we cannot ensure the security of the information you transmit to us, and so we urge you to take every precaution to protect your personal information when you are on the Internet.

Changes to this Privacy Policy

We may amend this policy from time to time. If we make any substantial changes in the way we use your personal information we will make that information available by posting a notice on this site.

Privacy Inquiries

Any requests to exercise your rights as stated above shall be addressed to Matrix IT Global Services Bulgaria EAD, email address: GDPR-info@matrix-global.net.

If you are a resident of the EU/EEA, and have a complaint regarding the processing of your personal information by us, you are entitled to report such dissatisfaction to the applicable supervisory authority in your country of residence.