

LNRD PRIVACY POLICY

Last Updated: March 18, 2021

In order to ensure transparency and give you more control over your Personal Information, this privacy policy (“**Privacy Policy**”) governs how we, LnrD Ltd (together, “**LnrD**” “**we**”, “**our**” or “**us**”) use, collect and store Personal Data we collect or receive from or about you (“**you**”) such as in the following use cases:

- (i) When you browse or visit our website www.lnrD.io (the “**Website**”)
- (ii) When you make use of, or interact with, our Website
 - a. When you contact us (e.g., support purposes, need help, submit a request)
- (iii) When you browse or visit our websites created for Customers to allow Candidates to apply to the job position (the “**Mini Site(s)**”)
 - a. When you complete the job simulator application (aka “the assessment”) for a unique position
- (iv) When you make use of LnrD’s dashboard (“**Dashboard**”)
 - a. When you are the Customer, sign up and make use of our Services via the Dashboard
 - b. When you open a support ticket
- (v) When you attend a marketing event and/or we exchange business cards and you provide us with your Personal Data
- (vi) When we use the Personal Data of our customers (e.g. contact details)
- (vii) When we use the Personal Data of our service providers (e.g. contact details)
- (viii) When you interact with us on our social media profiles (e.g., Facebook, Instagram, Twitter, LinkedIn)

We greatly respect your privacy, which is why we make every effort to provide a service that would live up to the highest of user privacy standards. Please read this Privacy Policy carefully, so you can fully understand our practices and your rights in relation to personal data. “**Personal Data**” or “**Personal Information**” means any information that can be used, alone or together with other data, to uniquely identify any living human being. Please note that this is a master privacy policy and some of its provisions only apply to individuals in certain jurisdictions.

Important note: Nothing in this Privacy Policy is intended to limit in any way your statutory right, including your rights to a remedy or means of enforcement.

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1. INTRODUCTION

- 1.1. LnrD provides a service that enables a job simulator, allowing candidates to pre-experience the job offer (“**Services**”). Also, we provide a dashboard (“**Dashboard**”) for our Customers to manage their screening process and candidates. For the avoidance of doubt, for the purposes of this Privacy Policy, a “**Customer**” is an entity, which has executed an agreement with LnrD.
- 1.2. If you are a candidate using LnrD's Services as a result of our relationship with Customer (“**Candidate(s)**”), for example, in the Mini Site(s), please note that the LnrD is a data controller of the Personal Data detailed in this Privacy Policy. We are not responsible for the privacy practices or the content of such Customer. Please be aware that the Customer can collect Personal Data from you, including, without limitation, videos and portfolios, hence LnrD is not responsible for such data, nor LnrD intends to analyze or process such information. Accordingly, we encourage you to read the terms and conditions and privacy policies of the Customer.
- 1.3. This Privacy Policy can be updated from time to time and, therefore, we ask you to check back periodically for the latest version of this Privacy Policy. If we implement significant changes to the use of your Personal Data in a manner different from that stated at the time of collection, we will notify you by posting a notice on our Website or by other means.

2. WHAT INFORMATION WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS USED

| Specific Personal Data we collect | Why is the Personal Data collected and for what purposes? | Third parties with whom we share your Personal Data | Consequences of not providing the Personal Data |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| When you browse or visit our Website | | | |
| Cookies, analytic tools and log files | Marketing, analytics and statistics. | For more information, see our cookie policy [*] | Certain non-essential Website features may not be available |
| When you make use of, or interact with, our Website | | | |
| When you contact us (e.g., support purposes, need help, submit a request) | | | |
| <ul style="list-style-type: none"> • Full name • Email address • Job title • Company name • Phone number • Message • Any other information that you decide to provide/supply us with | <ul style="list-style-type: none"> • To process and answer your questions • To provide support (e.g., to solve problems) | 3 rd party platforms such as for the following purposes: <ul style="list-style-type: none"> • Hotjar • Sentry | Cannot process and answer your questions Cannot provide support (e.g., to solve problems) |
| When you browse or visit our websites created for Customers to allow Candidates to apply to the job position in the Mini Site(s) | | | |
| Cookies, analytic tools and log files | Marketing, analytics and statistics. | Google Analytics | Certain non-essential Website features may not be available |
| When you complete the Assessment for a unique position | | | |
| <ul style="list-style-type: none"> • Information that you provide us when you complete the Assessment (including, by responding to the questions) through the Service, to the extent that includes Personal Data • Name or nickname (if you decide to apply anonymously) • Phone number • Email address • URL of your LinkedIn and other online profiles (optional) | <ul style="list-style-type: none"> • To open and maintain your Candidate records • To analyze the shape of your talent in light of your answers to the Assessment • To detect professional matches with job positions available in the Mini Site(s). • To personalize your experience when applying for a job position | 3 rd party platforms such as for the following purposes: <ul style="list-style-type: none"> • Alchemer • Comprofile • Airtable • Sendgrid • AWS | Cannot open and maintain your Candidate records Cannot communicate with you as part of the testing process (in some cases we may send you emails on behalf of our Customer, for example, when the Customer decides not to continue with your recruitment process) Cannot process your application and the answers to the tests |

| | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> Any other Personal Data that you decide to supply/provide us with | <p>Note: In some circumstances, we may send you emails on behalf of our Customer, for example, when the Customer decides not to continue with your recruitment process. For such communications, we are not the party deciding the purposes of the communication.</p> | | Cannot personalize your experience with our Services |
| <ul style="list-style-type: none"> Full name Email address | <ul style="list-style-type: none"> To send you information that we believe may be of interest to you, including, Service announcements, job opportunities and/or educational materials | 3 rd party platforms such as for the following purposes: <ul style="list-style-type: none"> Sendgrid AWS | Cannot send you information that we believe may be of interest to you, including, Service announcements, job opportunities and/or educational materials |
| <p>The Customer may be allow us access to additional information about you that we do not control, for example: Information about your candidacy and employment options (such as availability to be hired and salary expectations). The Customer’s evaluation of your candidacy. Videos, CV, portfolio and other pieces of information specifically requested and processed by the Customer.</p> | <p>For the avoidance of doubt, we may be allowed by the Customer to have access to some information on behalf of the Customer.</p> <p>Note: In some circumstances, we may send you emails on behalf of our Customer, for example, when the Customer decides not to continue with your recruitment process. For such communications, we are not the party deciding the purposes of the communication.</p> | N/A – We encourage you to read the terms and conditions and privacy policies of the Customer. | We may not be able to provide the Customer with some features of our Service. |
| When you make use of Lnr’s Dashboard | | | |
| When you are the Customer, sign up and make use of our Services via the Dashboard | | | |
| <ul style="list-style-type: none"> Log-in details Full name Email address Usage pattern | <ul style="list-style-type: none"> To allow you to create users for your use of the Dashboard To provide our Services To give your users access to our Dashboard To enjoy features available to registered users only To perform the agreement | 3 rd party platforms such as for the following purposes: <ul style="list-style-type: none"> AWS Google analytics Netlify Intercom Sentry Airtable | Cannot allow you to create users for your use of the Dashboard Cannot provide our Services Cannot give your users access to our Dashboard To enjoy features available to registered users only Cannot perform the agreement |
| When you open a support ticket | | | |
| <ul style="list-style-type: none"> Email address Support issue message Any other information that you decide to supply/provide us with | <ul style="list-style-type: none"> To provide support in accordance with the agreement To communicate with you for the support matter To customize your experience To gather your feedback | 3 rd party platforms such as for the following purposes: <ul style="list-style-type: none"> Slack Intercom AWS | Cannot provide support in accordance with the agreement Cannot communicate with you for the support matter Cannot customize your experience Cannot gather your feedback |
| When you attend a marketing event and/or we exchange business cards and you provide us with your Personal Data | | | |
| <ul style="list-style-type: none"> Full name Company name Job title Email address Phone number Any other data that you decide to supply/provide us with | <ul style="list-style-type: none"> To establish a business connection To send you marketing communications | 3 rd party platforms such as for the following purposes: <ul style="list-style-type: none"> Hubspot Gmail | Cannot establish a business connection Cannot send you marketing communications |
| When we use the Personal Data of our customers (e.g., contact details) | | | |
| <ul style="list-style-type: none"> Full name Email address Phone number Company name Job position Address Payment information Any other Personal Data you decide to provide/supply us with | <ul style="list-style-type: none"> To provide our products and services To perform the applicable agreement To communicate with you for service-related communications. | 3 rd party platforms such as for the following purposes: <ul style="list-style-type: none"> Gmail | Cannot provide our products and services Cannot perform the applicable agreement Cannot communicate with you for service-related communications. |
| When we use the Personal Data of our service providers (e.g., contact details) | | | |
| <ul style="list-style-type: none"> Full name Email address Phone number Company name Job position Address Payment information Any other Personal Data you decide to provide/supply us with | <ul style="list-style-type: none"> To contact our service providers To perform the applicable agreement To send contract-related communications. | 3 rd party platforms such as for the following purposes: <ul style="list-style-type: none"> Gmail | Cannot contact our service providers Cannot perform the applicable agreement Cannot communicate with you for service-related communications. |
| When you interact with us on our social media profiles (e.g., Facebook, Instagram, Twitter, LinkedIn) | | | |
| <ul style="list-style-type: none"> Full name Email address Company name Any other Personal Data you decide to provide/supply us with | <ul style="list-style-type: none"> To reply and/or respond to your request or question To send additional information of Lnr’s products and services as well as educational material. | 3 rd party platforms such as for the following purposes: <ul style="list-style-type: none"> Social media channels Hubspot Gmail | Cannot reply and/or respond to your request or question Cannot send additional information of Lnr’s products and services as well as educational material. |

Finally, please note that some of the abovementioned Personal Data will be used for detecting, taking steps to prevent, and prosecution of fraud or other illegal activity, to identify and repair errors, to conduct audits, and for security purposes. Personal Data may also be used to comply with applicable laws, with investigations performed by the relevant authorities, law enforcement purposes, and/or to exercise or defend legal claims. In certain cases, we may or will anonymize or de-identify your Personal Data and further use it for internal and external purposes, including, without limitation, to improve the services and for research purposes. “Anonymous Information” means information

which does not enable identification of an individual user, such as aggregated information about the use of our services. We may use Anonymous Information and/or disclose it to third parties without restrictions (for example, in order to improve our services and enhance your experience with them).

3. HOW WE PROTECT AND RETAIN YOUR INFORMATION

- 3.1. **Security.** We have implemented appropriate technical, organizational and security measures designed to protect your Personal Data. However, please note that we cannot guarantee that the information will not be compromised as a result of unauthorized penetration to our servers. As the security of information depends in part on the security of the computer, device or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information.
- 3.2. **Retention of your Personal Data.** Your Personal Data will be stored until we delete the record and we proactively delete it or you send a valid deletion request, please note that in some circumstances we may store your Personal Data for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, or (iii) if we reasonably believe there is a prospect of litigation relating to your Personal Data or dealings. Regarding retention of cookies, you can read more in our cookie policy [\[add link to the cookies policy\]](#).

4. HOW WE SHARE YOUR PERSONAL DATA

In addition to the recipients described above, we may share your Personal Data as follows:

- 4.1. With our business partners with whom we jointly offer products or services. We may also share Personal Data with our affiliated companies.
- 4.2. To the extent necessary, with regulators, courts or competent authorities, 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;
- 4.3. 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;
- 4.4. 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; and/or
- 4.5. Where you have provided your consent to us sharing or transferring your Personal Data (e.g., where you provide us with marketing consents or opt-in to optional additional services or functionality).
- 4.6. Storage: AWS.

If you want to receive the list of the current recipients of your Personal Data, please make your request by contacting us to privacy@lnrd.com.

5. YOUR PRIVACY RIGHTS. HOW TO DELETE YOUR ACCOUNT.

- 5.1. **Rights:** The following rights (which may be subject to certain exemptions or derogations) shall apply to certain individuals (some of which only apply to individuals protected by specific privacy laws):
 - You have a right to access Personal Data held about you. Your right of access may normally be exercised free of charge, however we reserve the right to charge an appropriate administrative fee where permitted by applicable law;
 - You have the right to request that we rectify any Personal Data we hold that is inaccurate or misleading;
 - You have the right to request the erasure/deletion of your Personal Data (e.g. from our records). Please note that there may be circumstances in which we are required to retain your Personal Data, for example for the establishment, exercise or defense of legal claims; and
 - You have the right to withdraw your consent at any time. Please note that there may be circumstances in which we are entitled to continue processing your data, in particular if the processing is required to meet our legal and regulatory obligations. Also, please note that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
- 5.2. You can exercise your rights by contacting us at privacy@lnrd.com. You may use an authorized agent to submit a request on your behalf if you provide the authorized agent written permission signed by you. To protect your privacy, we may take steps to verify your identity before fulfilling your request. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly in accordance with applicable law or inform you if we require further information in order to fulfil your request. When processing your request, we may ask you for additional information to confirm or verify your identity and for security purposes, before processing and/or honoring your request. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive. In the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than initially requested, we will address your request to the maximum extent possible, all in accordance with applicable law.
- 5.3. **Deleting your account:** Should you ever decide to delete your account, you may do so by emailing privacy@lnrd.com. If you terminate your account, any association between your account and Personal Data we store will no longer be accessible through your account. However, given the nature of sharing on certain services, any public activity on your account prior to deletion will remain stored on our servers and will remain accessible to the public.

6. **USE BY CHILDREN.** We do not offer our products or services for use by children and, therefore, we do not knowingly collect Personal Data from, and/or about children under the age of eighteen (18). If you are under the age of eighteen (18), do not provide any Personal Data to us without involvement of a parent or a guardian. For the purposes of the GDPR, we do not intend to *offer information society services directly to children*. In the event that we become aware that you provide Personal Data in violation of applicable privacy laws, we reserve the right to delete it. If you believe that we might have any such information, please contact us at privacy@lnrd.com.

7. **INTERACTION WITH THIRD PARTY PRODUCTS.** We enable you to interact with third party websites, mobile software applications and products or services that are not owned or controlled by us (each a “Third Party Service”). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services can collect Personal Data from you. Accordingly, we encourage you to read the terms and conditions and privacy policies of each Third Party Service.

8. **LOG FILES.** We use log files. We use such information to analyze trends, administer the Website, track users’ movement around the Website, and gather demographic information.

9. ANALYTIC TOOLS

- **Google Analytics.** The Website uses a tool called “Google Analytics” to collect information about use of the Website. Google Analytics collects information such as how often users visit this Website, what pages they visit when they do so, and what other websites they used prior to coming to this Website. We use the information we get from Google Analytics to maintain and improve the Website and our products. We do not combine the information collected through the use of Google Analytics with Personal Information we collect. Google’s ability to use and share information collected by Google Analytics about your visits to this Website is restricted by the Google Analytics Terms of Service, available at <https://marketingplatform.google.com/about/analytics/terms/us/>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>. You may learn more about how Google collects and processes data specifically in connection with Google Analytics at <http://www.google.com/policies/privacy/partners/>. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>.
- **Hotjar.** The Website uses Hotjar in order to better understand our users’ needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don’t like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users’ behavior and their devices. This includes a device’s IP address (processed during your session and stored in a de-identified form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), and the preferred language used to display our website. Hotjar stores this information in a pseudonymized user profile. Hotjar is contractually forbidden to sell any of the data collected on our behalf. For further details, please see Hotjar’s privacy policy at <https://www.hotjar.com/legal/policies/privacy>. You can opt-out to the creation of a user profile, Hotjar’s storing of data about your usage of our Website and Hotjar’s use of tracking cookies on other websites on this link <https://www.hotjar.com/legal/compliance/opt-out>.

We reserve the right to remove or add new analytic tools.

10. **CONTACT US.** If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us at privacy@lnrd.com.