

Privacy Policy

Rotacional Electronic Devices, Ida (“Rotacional”) are committed to protecting and respecting your privacy.

This policy ("the policy"), (together with our Terms of Use and any other documents referred to on it) details the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The information and services available on our site <https://rotacional.com/> (“our site”) are provided by us as a service and are for the use of individuals conducting and participating in video interviews or managing the recruitment process, or for those interested in knowing more about our company, product and services.

Please be aware that we collect and process personal data on behalf of employers and prospective employers (i.e. our customers), as well as on our own behalf. For example, where we are providing our video interviewing technologies to employers, the video interviews and the information that job applicants submit on the site during the employer's recruitment process will be collected by Rotacional on behalf of the employer. In such cases, you should also consult the employer's own privacy policy to find out more about their privacy practices.

This Privacy Policy relates, in the main part, to Rotacional's policies when it collects personal data on the site for its own purposes (e.g. outside of the recruitment process).

Information We May Collect From You

We may collect and process the following personal data about you:

- **Information you voluntarily provide to us:** Information that you provide by creating an account on our site, filling in forms or sending us e-mails. This includes information provided at the time of registering to use our site and may include your name, e-mail address, contact information and billing information. We may also ask you for information if and when you report a problem with our site.
- **Business information:** We may process your personal data when you conduct business with us (whether through our site or otherwise) as a customer, prospective customer, or as a vendor, supplier, consultant, professional advisor or other third party. For example, we may collect your business contact information, financial information (if needed to take payment or fulfil contractual obligations) and other related information about our contracts and business relationship.
- **Correspondence:** If you contact us, we may keep a record of that correspondence.
- **Information collected automatically:** We may collect information about your computer and log certain information about your activity on our site, including where available, your IP address, operating system, browser type, URL clickstream to, through and from our site, access times, pages viewed, resources accessed, software and hardware capabilities and language settings, for system administration, to understand how you use our site, troubleshoot problems, maintain security and to generally improve our services.
- **Surveys:** We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.

We will also collect personal data that you provide to us in the course of using our products and services - for example, the video interviews and other information you record and upload during the recruitment process. As stated above, we process this information on behalf of the employer/prospective employer and we do not have control over the information that is collected or how it is handled. You should consult your employer/prospective employer in the first instance if you have any questions or concerns about the handling of your personal data.

2. Cookies

We may obtain information about your general usage of our site by using a cookie file. A cookie is a small file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalized service. They enable us:

- To estimate our audience size and usage pattern.
- To store information about your preferences and allow us to customize our site according to your individual interests.
- To speed up your searches.
- To recognize you when you return to our site.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. You can find information on popular browsers and how to adjust your cookie preferences at the following websites:

Microsoft Internet Explorer: <http://www.microsoft.com/info/cookies.htm>

Mozilla Firefox: http://www.mozilla.org/projects/security/pki/psm/help_21/using_priv_help.html

Google Chrome: <https://support.google.com/accounts/answer/61416>

Apple Safari: Blocks cookies by default and accepts cookies only from your current domain. To change, click Safari, Preferences, Security, and choose your preference.

However, if you choose to disable cookies, you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

3. Where We Store Your Personal Data

The personal data that we collect from you may be transferred to, and stored at, a destination outside your country of residence. For example, if you are resident in the European Economic Area (EEA), your data may be transferred to and stored outside the EEA. It may also be processed by staff operating outside your country of residence and/or outside the EEA who work for us or for your employer/prospective employer. Such staff may be engaged in, among other things, the review and assessment of your personal data for the provision of support services. Where your personal data is being accessed outside your country of residence, we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this policy and any applicable laws. See Section 8 below for information about our Privacy Shield and US-Swiss Safe Harbor certifications.

All information you provide to us is stored on secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. Account passwords are encrypted within our systems.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal

data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

4. Uses Made of the Information

We use information held about you in the following ways:

- To allow you to create an account;
- To provide you or your employer/prospective employer with customer support and technical services on request;
- To allow you or your employer/prospective employer to access and make use of various tools, features and functions of our service;
- To generate internal reports about the use of our site;
- Where it is in accordance with your marketing preferences, to send you informational and promotional materials that you choose to receive via the medium chosen by you.
- To notify you about changes to or other important information about our service.
- For our business purposes, such as data analysis, audits, IT security, enhancing or improving our products and services.
- Website and system administration, and to improve the navigation and content of our site.
- We may also use the personal information we receive for the purposes of creating anonymized and aggregated statistics that do not reveal the identity of any person.

5. Disclosure of Your Information

Access to our site is subject to our Terms of Use and any other documents referred to on it. If you are accessing our site in order to complete and upload a video interview with a prospective employer, we will provide access to your video interview to your prospective employer, as well as any other information or documents you submit on the site as part of the recruitment process. We will also permit your prospective employer to download these onto their systems.

In addition, we may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries.

We also use third party vendors, consultants and other service providers to assist us in providing our website and services, including cloud hosting services, customer & IT support services, marketing and data analytics. In providing these services on behalf of Rotacional, it may be necessary for us to provide these third parties with access to your personal data.

For personal data originating from the European Union, we remain liable if our third party agents process your personal data in a manner inconsistent with the Privacy Shield Principles (see Section 8 below), unless we prove that we are not responsible for the event giving rise to the damage.

We may also disclose your personal data to third parties in the following circumstances:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Rotacional or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- In order to enforce or apply our Terms of Use and other agreements; or to protect the rights, property, or safety of Rotacional, our customers, or others.
- In response to or to comply with any applicable law, regulation, subpoenas, court orders, legal process or government requests, including in response to public authorities to meet national security or law enforcement requirements.

We will not use your personal data for marketing purposes without your consent and we will not disclose your personal data to any independent third parties for such purposes.

6. Your Employer/Prospective Employer

You may be using our services to (i) interview and recruit potential employees on behalf of your employer; or (ii) apply for a job with a prospective employer. Please note that your employer or prospective employer will have their own policies regarding the protection of your personal data, including any sensitive personal data. Whilst we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy we cannot accept any responsibility or liability for the policies of your employer/prospective employer. If you have any concerns about your employer's/prospective employer's use and processing of your personal data, please contact your employer/prospective employer directly in the first instance.

7. Access to Information & Other Rights

Under the Privacy Shield and certain applicable laws, you may have the right to access the personal data we hold about you, or to seek the correction, amendment or deletion of your personal data. To make such a request, you may contact us at tiaqol@rotacional.com or at the mailing address in Section 11 below.

If you wish to obtain a copy of personal data that we collect on behalf of employers and prospective employers (e.g. your video interview and other recruitment documents), please contact the employer/prospective employer directly.

8. The EU-US Privacy Shield

Whenever we process any personal data originating from the European Union in the US, Rotacional has certified its compliance with the EU-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use and retention of personal information from European Union Member countries. We have certified that in respect of all personal data received from the European Union, we adhere to the Privacy Shield Principles of: Notice, Choice, Accountability for Onward Transfers, Security, Data Integrity and Purpose Limitation, Access and Recourse, Enforcement and Liability. To access the Privacy Shield List and to find details of our certification, please visit: <https://www.privacyshield.gov/list>.

The Federal Trade Commission has investigation and enforcement authority over our compliance with the Privacy Shield.

Residents of the European Union who believe that their information has not been processed in compliance with the Privacy Shield Principles may raise their complaint in a number of ways:

- (1) You can contact us directly using the contact details at Section 11 below and we will respond to your complaint within 45 days of receipt.

(2) We have also committed to cooperate and comply with the advice of the European Data Protection Authorities (DPAs) in respect of any unresolved privacy complaints under the Privacy Shield. If you are unhappy with the way we handled your request or complaint, you can make a complaint to your local data protection authority free of charge. The contact details of the European DPAs can be found here: http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm.

(3) Further, the European DPAs may refer your complaint to the US Department of Commerce or the Federal Trade Commission for further investigation.

(4) For residual disputes that cannot be resolved by the methods above, you may be able to invoke a binding arbitration process under certain conditions. To find out more about the Privacy Shield's binding arbitration scheme, please see <https://www.privacyshield.gov/article?id=My-Rights-under-Privacy-Shield>.

9. The US-Swiss Safe Harbor Framework

In respect of personal data originating from Switzerland, Rotacional, has certified its compliance with the US-Swiss Safe Harbor Framework set forth by the US Department of Commerce. This means that for all personal data originating from Switzerland, we will adhere to the Swiss Safe Harbor Principles of Notice, Choice, Onward Transfer, Security, Data Integrity, Access and Enforcement when processing such information in the US. To learn more about the Swiss Safe Harbor program and to view our certification page, please visit <https://safeharbor.export.gov/swisslist.aspx>.

If you have any questions or concerns about our Swiss Safe Harbor program, please contact us at the contact details at Section 11 below. We have also committed to cooperate and comply with the advice of the Swiss Federal Data Protection and Information Commissioner.

10. Changes to Our Privacy Policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

11. Contact

Questions, concerns comments and requests regarding this privacy policy are welcomed and should be addressed to:

Rotacional Electronic Devices, Ida
Labs Lisboa
Rua Adriano Correia de Oliveira, 4A (Lab C1)
1600-312 Lisboa, Portugal

Phone number: +351 918 493 196
Email: tiagol@rotacional.com