



PRIVACY POLICY

SHE IS MOM S.R.L. headquartered in Bucharest, 33 Ion Câmpineanu Street, Room 1, Building 3, 2nd Entrance, 1st Floor, Apartment 37, registered at Bucharest Trade Register Office under no. J40 / 4373/2021, Single Registration Code 43889897, having wire transfer account no. RO72BTRLRONCRT0593426901, opened at TRANSILVANIA BANK.

She is MOM, accessible at www.sheismomclub.com, one of our main priorities is the privacy of our visitors. This Privacy Policy document explains when and why we collect personal information about people who visit our website, apply to our roles and interact with us regarding interview processes with our clients. It explains how we use it, the conditions under which we may disclose it to others and how we keep it secure.

This privacy policy applies only to our online activities and is valid for visitors to our website regarding the information that they shared and/or collected in www.sheismomclub.com. This policy does not apply to any information collected offline or via channels other than this website.

If you have additional questions or require more information about our Privacy Policy, do not hesitate to contact us through email at contact@sheismomclub.com.

CONSENT

By using our website, you hereby consent to our Privacy Policy and agree to its terms.

Who is She is MOM?

She is MOM wants to be your lifelong career counselor. If your life perspective changes, you are developing or reaching new goals, offering the right career support. We aim to build a long-lasting relationship, build a product and a Service available 7 days a week, 24 hours a day, enabling you to take your life and future into your own hands.

LEGITIMATE INTERESTS

She is MOM stores and processes your personal data under lawful grounds of legitimate interests. It means we have a genuine and honest reason for processing your personal information, and we are not harming any of your rights and interests. In fact, we use your data in ways that you would reasonably expect to present you with new job opportunities or partner with you as a client for your hiring needs, when you make a purchase or enjoy any of our services or functionalities.



You have the right to object to these grounds of processing. Should you wish to object, please do so either in writing by emailing us at contact@sheismomclub.com.

HOW DOES SHE IS MOM COLLECT INFORMATION FROM YOU?

The personal information we collect might include:

your identity data (name, address, email address, phone number, CV, and, thus, your work history);

economic and transactions information (for example, your payment or card data, information on your purchases, orders, returns, etc.);

By registering a user account on the She is MOM website, you will give the express agreement regarding the terms and conditions of use of the website, the provisions having the value of a contract between you and our company. In this regard, the data provided by you through the user account She is MOM, are processed under 6.1 letter b.)¹ of the GDPR.

Based on obtaining the data subject's consent to process personal data they are processed according to art. 6.1 letter a.)² of the GDPR. If the processing is necessary for the execution of a contract to which the data subject is a party or to make requests at the request of the data subject before the conclusion of a contract, the processing is performed based on art. 6.1 lit b.) of the GDPR. If the processing is necessary to fulfill a legal obligation, it will be carried out according to art. 6.1 lit c.)³ of the GDPR. If the processing is required for the legitimate interests pursued by She is MOM, it will be carried out according to art. 6.1 lit f.)⁴ of the GDPR.

The purpose of the processing of personal data on the She is MOM website is:

¹ <https://gdpr-info.eu/>

Art. 6 GDPR Lawfulness of processing

1. Processing shall be lawful only if and to the extent that at least one of the following applies:

(b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;

² Idem

Art. 6 GDPR Lawfulness of processing

1. Processing shall be lawful only if and to the extent that at least one of the following applies:

(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;

³ Idem

Art. 6 GDPR Lawfulness of processing

1. Processing shall be lawful only if and to the extent that at least one of the following applies:

(c) processing is necessary for compliance with a legal obligation to which the controller is subject;

⁴ Idem

Art. 6 GDPR Lawfulness of processing

1. Processing shall be lawful only if and to the extent that at least one of the following applies:

(f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.



- to offer the candidates the possibility of looking for a job by creating a profile, to facilitate the personnel recruitment activity of the employers, as operators, respectively to interact with them;
- to manage payment of the products and services that you purchase, regardless of the payment procedure used;
- to activate the necessary arrangements in order to control and prevent potential fraud against you and against us during the purchase process. If we consider that the transaction can be fraudulent, this processing may cause the blocking of the transaction;
- to manage potential returns after you have purchased and manage requests of availability information for services through the Platform.

Since the data subjects for the processing of personal data belong to the active category on the labor market, the data provided by them will be processed until the purpose for which they were collected ceases, respectively, until their withdrawal from the labor market, respectively to the limits required by law. During the processing period, the data subjects have the right to request the cessation of the data processing.

To avoid any abuse regarding the storage of personal data, the data processed in favor of the authorized persons, respectively, the unblocked CV data will be kept in the employers' accounts for 1 year from their provision.

DATA SECURITY

For confidentiality and data security, the She is MOM account is protected by a password.

INFORMATION ABOUT CANDIDATES

We retain various types of Personal Information about Candidates in connection with the Services, including:

- Name
- Email address
- Phone
- City of residence
- Password
- Work and educational history
- Other information contained on Candidate CVs
- Photo
- Video
- Links to publicly available information about them

Information about business accounts: Agencies and Employers. We collect various types of Personal Information about business accounts (Agencies and Employers), including:

- Name
- Email address



- Company
- Phone number
- Password

You can create a CV profile within your account, which will consist of various CV-related pieces of information and attachments provided by you. It will also keep a record of your activity on sheismomclub.com.

By registering a user account on the She is MOM website, your profile will become public. In this case, the "third party" companies (the people who apply to She is MOM for the CV search service) who have access to the CVs from our database will have access to your CV.

The default when you sign up is for recruiters to be able to see your profile. You can change the visibility of your profile at any time.

She is MOM grants the user the right to change your contact details that you have registered, some aspects of which you are interested in, including new information about products and services launched. You can also request deletion of your data at any time.

Processing and controlling the data provided electronically via our website is based on the voluntary consent of the Candidates (referred to as "Users") and Clients having access to our Service. In some instances, data control is based on obligations prescribed by law. Any of sheismomclub.com Services is used voluntarily. Personal data is collected only if you wish to use our Service. If you disagree with the content of the present Privacy Policy or that of the Terms and Conditions, please do not provide any personal data, do not create an account, or refuse giving consent when requested. She is MOM services can only be used by registered users. Using She is MOM services, or by completing the registration, you explicitly state that you agree with our Privacy Policy. We are devoted to protecting the personal data of our Users; therefore, our data control practice abides by the relevant laws in force while protecting and respecting the private spheres of Users.

HOW IS YOUR INFORMATION USED?

We may use your information to:

- providing the services you have given your consent for, matching the candidates with the best jobs for them;
- contact you for future opportunities that may be interesting to you;
- honoring our contractual obligations to business users;
- seek your views or comments on the services we provide;
- notify you of changes to our services;
- send you communications to update your details;
- creating statistics and analyses based on aggregated data.

We review our data retention periods for personal information regularly.

OPTIMIZATION OF SEARCH FUNCTIONALITIES AND RECOMMENDATION



We reserve the right to process information about search patterns on the website to create statistical models to configure the website for easy use and optimize the search and recommendation functionalities of the ads available on the website. In this regard, we collect your IP address in a pseudonymized form for 30 days. The processing and temporary storage of IP addresses are based on art. 6.1 letter f.)⁵ of the GDPR, our company's legitimate interest is to improve our services by ensuring certain functionalities are drawn upon statistical models.

NEWSLETTER TYPE NOTIFICATIONS

By subscribing to newsletter notifications, She is MOM will process your email address to send you notifications containing topics you may be interested in. The legal basis for the processing of these data is based on art. 6.1 letter a.)⁶ of the GDPR. For the demonstrability of your identity, in which the need for subscription under art. 6.1 letter f.) of the GDPR, we will store your IP address until you unsubscribe or until the cessation of the notifications is sent to you.

The notifications transmitted contain the so-called "tracking pixels," which inform us if the respective notification was opened, respectively, the date of its access. The data mentioned above are necessary to optimize the notification system issued by sheismomclub.com, constituting the legitimate interest according to art. 6.1 letter f.) of the GDPR.

CORRESPONDENCE AND ELECTRONIC CONTACT

Our website may contain contact forms through which you can contact us electronically. We can also be contacted at the email as mentioned above address. In this sense, the data containing the transmitted messages and the answers offered by us will be stored and processed until the issues discussed are considered clarified by the two parties.

DISCLOSURE AND TRANSMISSION OF PERSONAL INFORMATION

She is MOM will not transmit (by sale or rent) to third parties your personal information.

She is MOM may, however, transmit the information to third parties in the following cases:

With your consent;

⁵ <https://gdpr-info.eu/>

Art. 6 GDPR Lawfulness of processing

1. Processing shall be lawful only if and to the extent that at least one of the following applies:
(f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

⁶ Idem

Art. 6 GDPR Lawfulness of processing

1. Processing shall be lawful only if and to the extent that at least one of the following applies:
(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;



- If it is necessary to send some information to provide the products and services requested by you.
- In case the information is needed to the company partners for the improvement or facilitation of some services or products ordered by you.

Partner companies have the right to use the personal data provided directly by sheismomclub.com only to the extent that their assistance is required.

We may transmit personal information to public authorities or institutions following legal provisions or good faith if:

1. is provided in a lawful provision;
2. protect the rights of She is MOM or its affiliates;
3. prevents a crime or protects national security;
4. protect the safety of the individual or public safety;

If She is MOM merges or is acquired in whole or in part by another company, the database is transferred to the new operator. In case She is MOM becomes insolvent, voluntary or involuntary, through the liquidator, the administrator, or the buyer, the database can be sold, authorized, traded only with the court's consent. If the situations mentioned above appear, you will be notified by e-mail or by an announcement posted on sheismomclub.com.

Third-party empowerment for hosting, security, maintenance, and marketing services and technical support activities

In some cases, She is MOM uses external service providers (processors) who receive personal information from candidates. Think of external suppliers of applications, storage, e-mail, telephone services. These third parties may use the personal information only for defined data processing at the request of She is MOM and are not permitted to use or transmit personal information for any other purpose.

MARKETING EMAILS

From time to time, we may also wish to contact you regarding future job opportunities. However, to do so, we now require you to OPT IN or OPT OUT of marketing emails. Please specify your preference by letting us know at contact@sheismomclub.com.

GOOGLE ANALYTICS

To collect standard internet log information and details of visitor behavior patterns. This information is only processed in a way that does not identify anyone. sheismomclub.com would like to keep you informed about the number of visitors to its website. The identity of the visitors is not essential. Therefore, no specific, personally identifiable information is stored or saved. However, anonymized information is kept, such as the number of visitors, which part of the website is visited, the time of visits, the country from which the website is visited, and general information about the software with which the visitor works.



For this purpose, She is MOM uses cookies, namely: Google Analytics. Google Analytics is an analytical cookie for which you do not need to give separate permission beforehand. With the help of this information, She is MOM can continue to optimize the website.

RIGHTS OF THE DATA SUBJECT

As a user of She is MOM, according to the provisions of the GDPR, you benefit from the following rights:

The right of access to information: you can request confirmation that She is MOM processes personal data regarding your person;

If so, you can request access to the following information:

1. the purposes of the processing;
2. the categories of personal data targeted;
3. the recipients or categories of recipients to whom the personal data have been or are to be disclosed, in particular recipients from third countries or international organizations;
4. where possible, the period for which it is expected that personal data will be stored or if this is not possible, the criteria used to establish this period;
5. the existence of the right to request the rectification or deletion of personal data or the restriction of the processing of personal data relating to the data subject or of the right to oppose the processing
6. the right to lodge a complaint with a supervisory authority;
7. if the personal data are not collected from the data subject, any available information regarding their source;
8. the existence of an automated decision-making process, including the profiling referred to in Article 22 (1) and (4), and at least in these cases, relevant information on the logic used and the importance and expected consequences of such processing data subject.

Suppose the personal data is transferred to a third country or an international organization. In that case, the data subject has the right to be informed about the appropriate guarantees under Article 46 regarding the transfer.

THE RIGHT TO RECTIFICATION

You have the right to obtain, without undue delay, the rectification of inaccurate personal data concerning it. Considering the purposes for which the data were processed, the data subject has the right to obtain the completion of incomplete personal data, including by providing a supplementary statement.

The right to delete data ("the right to be forgotten")

You have the right to obtain the deletion of personal data concerning you, without undue delay, if one of the following reasons applies:

1. personal data are no longer required for the purposes for which they were collected or processed;



2. the data subject withdraws his consent based on which the processing takes place, and there is no other legal basis for the processing;
3. the data subject opposes processing according to Article 21 (1)⁷, and no legitimate reasons are prevailing in the processing, or the data subject opposes processing according to Article 21 (2)⁸;
4. personal data have been processed illegally;
5. personal data must be erased to comply with a legal obligation under Union or national law

The exercise of the above rights does not apply to the extent that processing is necessary:

1. for the exercise of the right to free speech and information;
2. for compliance with a legal obligation which provides for processing under Union or national law or the performance of a task performed in the public interest
3. for reasons of public interest in the field of public health,
4. for archiving purposes in the public interest, for scientific or historical research purposes or statistical purposes, to the extent that the law exercised is likely to make impossible or seriously impair the achievement of the purposes of the processing in question; or
5. for finding, exercising, or defending a right in court.

If She is MOM has released personal data and is obliged to delete it, taking into account the technology available and the cost of implementation, we will take reasonable measures, including technical measures, to inform third parties that process the personal data that the person the data subject requested the deletion by these operators of any links to the respective data or of any copies or reproductions of these personal data.

CHANGES

This privacy statement may be periodically modified by She is MOM Candidates from whom we hold personal information are personally informed about this.

The provisions of this statement are supplemented by the general conditions of the Privacy Policy She is MOM.

⁷ <https://gdpr-info.eu/>

Art. 21 GDPR Right to object

1. The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions. 2The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

⁸ Idem

Art. 21 GDPR Right to object

2. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.