



## PRIVACY POLICY

**PLEASE READ THIS PRIVACY POLICY CAREFULLY. BY REGISTERING TO THIS SITE AND ANY PAGES THEREOF, YOU AGREE TO SHE IS MOM PRIVACY POLICY. IF YOU DO NOT AGREE TO THE POLICY BELOW, DO NOT REGISTER TO THIS SITE, OR ANY PAGES THEREOF.**

For She is Mom, accessible at [www.sheismomclub.com](http://www.sheismomclub.com), one of our main priorities is our users' privacy. This Privacy Policy document explains when and why we collect personal information and informs you of its policies and practices regarding collecting, using, and disclosing information through the Site.

This privacy policy applies only to our online activities and is valid for users of our website regarding the information they share and/or collect on [www.sheismomclub.com](http://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](mailto:contact@sheismomclub.com).

### CONSENT

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

### LEGITIMATE INTERESTS

She is Mom who 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 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 career 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 or by emailing us at [contact@sheismomclub.com](mailto:contact@sheismomclub.com).

### YOUR PERSONAL INFORMATION

She is Mom limits the collection, use, and processing of collected information to that required to provide the Services and assist in the usability of the Site. Information that is personally identifiable to you such as your name, address, email address, or phone number is referred to as "Personal Information". By submitting Personal Information to us through the Site (when creating your account or profile, for example), or to our consultants, providers, or employees during the application process, you expressly agree and consent to the processing of your Personal Information in accordance with this Privacy Policy.



## HOW DOES SHE IS MOM COLLECT INFORMATION FROM YOU?

When you create an account or a profile on the Site, we collect and store Personal Information. The following are types of information we receive from you including certain Personal Information:

From "I am woman": First and last name, password, contact information (phone number, street address, city, country and email address), date of birth, short personal summary, work history, your skills, the type of work you are interested in, portfolio and video presentation.

From "I am company": First and last name, company name, representative name, password, contact information (phone number, street address, city, country and email address), description, video presentation, open positions description, bank account or other payment and invoice-related information.

From "I am mentor": First and last name, password, contact information (phone number, street address, city, country and email address), description, video presentation, your expertise, professional info (company name and position), bank account or other payment and invoice-related information.

From "I am benefit": First and last name, company name, representative name, password, contact information (phone number, street address, city, country and email address), description, video presentation, services (name, description, price), bank account or other payment and invoice-related information

- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- She is Mom does not collect Personal Information, beyond IP address and information about your browser, from you unless you provide it to us. This means that you can visit our Site without telling us who you are or revealing any Personal Information about yourself.

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.)<sup>1</sup> 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.)<sup>2</sup> of the GDPR. If the processing is necessary for the execution of a

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<sup>1</sup> <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;

<sup>2</sup> 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;



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.)<sup>3</sup> 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.)<sup>4</sup> of the GDPR.

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

- to offer the Users 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.

You can create a profile within your account, which will consist of various 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" individuals or legal entities will have access partially or completely to the professional information from our database.

The default when you sign up is for your profile to be inactive. 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 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.

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<sup>3</sup> 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;

<sup>4</sup> 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.



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.

## **DATA SECURITY**

For confidentiality and data security, the She is Mom account is protected by a password. Any information that you provide will not be used in ways other than as set forth in this Policy or in ways to which you have explicitly consented.

## **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.)<sup>5</sup> 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

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<sup>5</sup> <https://gdpr-info.eu/>

Art. 6 GDPR Lawfulness of processing

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(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.



of these data is based on art. 6.1 letter a.)<sup>6</sup> 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.

## **COMMUNICATION**

We will contact you through email, mobile phone, or through notices posted on our websites, and other ways through our Services. We will send you calendar invites to facilitate interviews or mentoring sessions, with prospective employers and mentors and messages about the availability of our Services, security, or other service-related issues. We also send messages about how to use our Services, network updates, reminders, Match notifications, and promotional messages from us and our partners. Please be aware that you cannot opt out of receiving service messages from us, including security and legal notices.

We also enable communication between you and prospective employers. You may receive email and phone communications from prospective employers.

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.

## **TESTIMONIALS**

From time to time, we may post Users testimonials, which may contain Personal Information such as the individual or entity, on the Site, but will obtain the User's consent prior to posting the testimonial.

## **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;

- 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.

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<sup>6</sup> 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;



We may transmit personal information to public authorities or institutions following legal provisions or in 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;

Third-party may be empowered 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 users. 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 opportunities. However, to do so, we require you to OPT IN or OPT OUT of marketing emails. Please specify your preference by letting us know at [contact@sheismomclub.com](mailto: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.

## **LINKS TO THIRD PARTY SITES**

The Site may contain links to other websites including social media widgets and "like" or "share" buttons. These other websites, third-party widgets, and buttons are hosted by third parties and not by She is Mom. She is Mom is not responsible for the privacy practices or the content of such third-party websites or links. We encourage you to learn about the privacy practices and terms of use of those other companies, including their opt-out processes.

## **PROTECTING THE PRIVACY OF CHILDREN**

Children under 18 years old are not the target audience for our Site. To protect their privacy, we prohibit the solicitation of personal information from children under 18 years old and do not



knowingly collect Personal Information from such children. If you are under 18, do not use or provide any information on this 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:

1. The right of access to information: you can request confirmation that She is Mom who 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.

2. 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.

3. 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)<sup>7</sup>, and no legitimate reasons are prevailing in the processing, or the data subject opposes processing according to Article 21 (2)<sup>8</sup>;
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 that 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

We reserve the right to change, modify or update this Privacy Policy at any time, so please review it frequently. Any material changes in the way we use your Personal Information will be contained in the updated Privacy Policy posted on the Site. Your continued use of the updated Policy will signify acceptance of the changes.

If you have questions or concerns about our Privacy Policy, please email us at [contact@sheismomclub.com](mailto:contact@sheismomclub.com).

This Privacy Policy is effective as of January 25, 2022.

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<sup>7</sup> <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.

<sup>8</sup> 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.