

Privacy Notice

We at Mobilesson Ltd. d/b/a Connecteam (“**Connecteam**“, “**us**“, “**we**“, or “**our**“) recognize and respect the importance of maintaining the privacy of our Customers and their Personnel. This Privacy Notice describes the types of Personal Data (as defined below) we collect from you when you visit our website (“**Site**“) and/or use our Platform or App (collectively, the “**Services**“), as well as the ways in which we collect, process, transfer, store and disclose such Personal Data. It also describes how you may control certain uses of the Personal Data. If not otherwise defined herein, capitalized terms have the meaning given to them in the Terms of Service, available at <https://connecteam.com/terms-conditions/> (“**Terms**“). “**You**” means any user of the Site, App, Platform and/or Services.

“**Personal Data**” or “**Personal Information**” means any information that refers to, is related to, or is associated with an identified or identifiable individual or household.

Our Role:

– Data Processor. When we collect, process and manage Personal Data in the context of providing Services to our business customers who accepted our Terms or otherwise entered into an agreement with us (“**Customers**“), the Customer is the data controller with respect to such Personal Data and we are the data processor. This includes Personal Data uploaded to our Platform/App by our Customers’ employees, service providers and independent contractors (“**Customer Data**“). Our processing of such Customer Data on behalf and under the instruction of the respective Customer is governed by our [Data Processing Addendum](#) with them. For more information, please refer to Section 11 below.

This Privacy Notice which describes Connecteam's independent privacy and data processing practices as a "data controller" – **does not apply** to the processing of Customer Data (unless otherwise specifically stated). Such processing is detailed here for completeness and informational purposes only. If you have any questions or requests regarding Customer Data, please contact your Account Owner directly.

– Controller. When we process the Personal Data of Prospects and Users (excluding Customer Data, as detailed above) in their use of our Services, as specified under Section 11 to this Privacy Notice, we are the data controller.

Representative:

– Maetzler Rechtsanwalts GmbH & Co KG (Prighter) has been designated as Connecteam's representative in the European Union for data protection matters pursuant to Article 27 of the GDPR. Maetzler Rechtsanwalts GmbH & Co KG may be contacted only on matters related to the processing of Personal Data in the EU. To make such an inquiry, please contact Maetzler Rechtsanwalts GmbH & Co KG through this contact form: <https://prighter.com/q/14267474>.

– Prighter Ltd has been designated as Connecteam's representative in the United Kingdom for data protection matters pursuant to Article 27 of the UK-GDPR. Prighter Ltd may be contacted only on matters related to the processing of Personal Data in the UK. To make such an inquiry, please contact Prighter Ltd. through this contact form: <https://prighter.com/q/14267474>.

Privacy Notice Key Points:

The key points listed below are detailed further throughout this Privacy Notice. You can click on any section to find out more about the below topics.

1. Personal Data We Collect, Uses and Legal Basis

1.1. Prospects

1.2. Account Owners, Administrators & Employees

2. Communications

3. Sharing the Personal Data We Collect

4. International Transfer

5. Security

6. Your Rights

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1. **Personal Data We Collect, Uses and Legal Basis.** Depending on the ways in which you use our Services, we collect different types of Personal Data, and we and any of our third-party contractors and service providers use the Personal Data we collect for different business and commercial purposes, as specified below. You are under no legal obligation to provide us with your Personal Data. However, if you refuse to provide such Personal Data, we may not be able to provide you with our Services. Connecteam does not collect, use or disclose sensitive Personal Data.

1.1. **Prospects.** If you are a visitor to our Site, participant at one of our events, or otherwise a prospective User (as defined below) who visits our Site or interacts with any of our online ads, emails or communications under our control, we collect the following types of Personal Data:

1.1.1. **Contact Information**

o What Personal Data We Collect: When you (1) request information from us through the Site, (2) fill out (online) forms, (3) participate in our events, (4) contact us using a referral link, or (5) contact us for any other reason, we will collect any data you (or our Users who have referred you, as further described in Section 2 below) provide, such as your name and/or email address, and any additional information submitted via the Site, online ads, emails, or other communication.

o How we use this data & Legal Basis: (1) To provide support, respond to your request or inquiry (Legitimate Interest); (2) to provide you with informational newsletters, and promotional materials relating to our Services, including via email and for general advertising efforts including ad measurement, audience research, and personalized advertising (Legitimate Interest; Consent where applicable). For more information about our direct marketing activities and how you can control your preferences, please see the Promotional Communications section below.

1.1.2. **Automatically Collected Data**

o What Personal Data We Collect: When you visit the Site we automatically collect information about your computer or mobile device, including non-Personal Data such as your operating system and browser type, internet service provider (ISP), and Personal Data such as your IP address, sessions recordings, browsing history on our site, as well as referring and exit pages (the pages you clicked to reach our site and the pages you clicked from our site), how often you visit the Site, which pages you visit and when, which ad or email messages were presented to you and other information regarding your viewing history on our Site. For more information about the cookies and similar technologies we use, including how to adjust your preferences on our Site, please see our [Cookie Policy](#).

o How we use this data & Legal Basis: (1) to understand how our Prospects and Users engage with our Site, to help facilitate our operations, including collecting and analyzing aggregated, non-personal analytics, developing new products or services, and improving our current content, products, and services (Legitimate Interest); (2) to prevent fraud, protect the security of our Site and address any problems with the Site (Legitimate Interest).

1.1.3. **Data Collected from Third Parties.** If you are a prospect (as detailed under 1.1) we may receive Personal Data about you from third-party sources. We may use this data for sales & marketing efforts (Legitimate Interest; Consent (where applicable)).

1.2. **Account Owners, Administrators & Employees.** If you are an Account Owner, Administrator, or an Employee (including a service provider or an independent contractor of one of our Customers) (collectively, a “User”), using the Platform and/or an App in connection with a Customer account, we collect the following types of Personal Data:

1.2.1. **Registration Data**

o What Personal Data We Collect: If you are an Account Owner, in order to use our Services, you will be required to register and provide Personal Data requested by us, including your full name, email address and phone number. Administrators and Employees may be requested to provide additional details such as job title, profile picture or any other information as required by either your Administrator or Account Owner.

o How we use this data & Legal Basis: (1) to provide you access to our Services, to provide support, respond to your inquiries and requests and to contact and communicate with you (Performance of a Contract); (2) to prevent fraud, protect the security of and address any problems with the our Services (Legitimate Interest); (3) to provide you with informational newsletters, and promotional materials relating to our

Services, including via email or phone, and for general advertising efforts including ad measurement, audience research, and personalized advertising (Legitimate Interest; Consent where applicable). For more information about our direct marketing activities and how you can control your preferences, please see the Promotional Communications section below; and (4) to create a general profile of Customers and usage profiles of their respective Users in order to improve and optimize our Services (Legitimate Interest).

1.2.2. **Payment Data**

o What Personal Data We Collect: If and when you make a payment (using a credit card) to Connecteam for use of our Services, we receive information related to such a purchase, including the last four digits of your credit/debit card number, CVV, expiration date, and the name of the cardholder.

o How we use this data & Legal Basis: To process the payment for your purchase (Performance of a Contract) and for the purposes of fraud prevention (Legitimate Interest).

1.2.3. **Communications Data**

o What Personal Data We collect: Personal Data contained in any forms and inquiries that you may submit to us, including support requests, interactions through instant messaging apps, registrations to our events, participation in our online and offline communities and activities; surveys, feedback and testimonials, phone call and video conference recordings, as well as written correspondences, screen recordings, screenshots, and related information that may be automatically recorded, tracked, transcribed and analyzed. In addition, any User may refer a friend to our Services, in which case such a User will be required to provide us with such User's contact details (full name, email address and phone number) ("Referral Registration Data").

o How we use this data & Legal Basis: (1) for analytics (Legitimate Interest), quality control and improvements (Legitimate Interest); training, and record-keeping purposes (Performance of a Contract; Legitimate Interest); (2) To facilitate, operate, enhance, and provide our Services (Performance of Contract; Legitimate Interests); and (3) To provide our Customers and Users with support, to test and monitor the Services, or diagnose or fix problems, and to train our Customers and Customer-facing staff (Performance of Contract; Legitimate Interests); and (4) in the case of Referral Registration Data, to contact you (including via email) with referral activities, to provide you with informational newsletters and promotional materials relating to our Services (Legitimate Interest; Consent where applicable).

For more information about our direct marketing activities and how you can control your preferences, please see the Promotional Communications section below.

1.2.4. Automatically Collected Data

o What Personal Data We Collect: When you use our Services, we automatically collect information about your computer or mobile device, including nonpersonal data such as your operating system and browser type, internet service provider (ISP) and language settings, and Personal Data such as your IP address, browsing history, including referring and exit pages, connectivity, session recordings, technical and usage data, activity logs, the relevant cookies and pixels installed or utilized on your device, clicks, use of features and other interactions, and any information regarding your viewing history on the Platform or App, browser language, and browser time zone. This data is collected and generated automatically, including through the use of analytics tools (including cookies and pixels) which collects data such as: how often Users use the Services, how Users interact with and use the Services, including technical data concerning the performance, functionality, potential fraudulent activities and stability of the Platform. For more information about the cookies and similar technologies we use and how to adjust your preferences on the Platform or App, please see the section “Cookies and Similar Technologies” below.

o How we use this data & Legal Basis: (1) to analyze usage of our Services, including in an aggregated non-specific manner, develop new products or services and improve current content, products, and services (Legitimate Interest); (2) to prevent fraud and maintain the security of our Services and address any problems with the Services (Legitimate Interest); (3) to provide you with customized content, targeted offers, and advertising related to our products and services, based on your usage history on the Services on other third-party sites or apps you may visit and/or use, or via e-mail (Legitimate Interest, and Consent where applicable).

1.2.5. Materials You Upload

o What Personal Data We Collect: Any personal data, including text, documents and images you upload to the Platform.

o How we use this data: Connecteam does not use this data for its own purposes and acts only as a “data processor” with respect to such data. The usage of this Personal Data and the relevant legal basis will be determined by the Customer to which your account is associated. For more information on this see Section 11 below.

1.2.6. Geo-location

o What Personal Data We Collect: When you use specific functionalities in our App, you may be asked to share your mobile device’s precise (GPS) geo-location information. Such geo-location information may include physical locations visited (latitude & longitude). Whether or not we collect this geo-location data is entirely determined by your Account Owner or Administrator in their sole discretion and Connecteam acts only as a “data processor” with respect to such information. For example, they may only allow you to clock-in or clock out if they are able to verify your location via your device. If you do not wish to allow the collection of your precise location, in most cases you will be able to turn off such data collection at any time by accessing the privacy settings of your mobile device and/or adjusting the permissions for the App. Please note, however, that

some of the App's features may not work properly if you turn this off, and we are not responsible for any implication of turning off such geo-location tracking.

o How we use this data: Connecteam does not use geo-location data for its own purposes. The use of geo-location data and the underlying legal basis for its use is determined by the Customer to which your account is associated. For more information on this see Section 11 below.

1.2.7. Data Collected from Third Parties. If you are an Account Owner or Administrator we may receive Personal Data about you from third-party sources. We may use this data to improve our sales & marketing efforts (Legitimate Interest, and Consent where applicable).

For the purposes of the California Consumer Privacy Act (CCPA), specifically in the last twelve (12) months, we have collected the following categories of Personal Information: Identifiers; Customer Record Information; Internet or other electronic network activity information; Geolocation data; Audio, Electronic, Visual, or Similar Information; Commercial Information; Professional or Employment-Related information; and Inferences.

If you reside or are using our Services in a territory governed by privacy laws under which "consent" is the most appropriate legal basis for the processing of Personal Data as described herein (in general, or specifically with respect to the types of Personal Data you expect or elect to process or have processed by us, via the Services, or due to nature of such processing), your acceptance of our [Terms](#) and this Privacy Notice shall be deemed as your consent to the processing of your Personal Data for all purposes detailed hereunder, unless applicable law requires otherwise.

2. Communications

We engage in service and promotional communications, through e-mail, phones, SMS and push notifications.

2.1. Service Communications. We may send you service-related communications, including service announcements and administrative messages (such as registration confirmations, log-in attempts or password reset attempts). Please note that you will not be able to opt-out of receiving certain communications which are integral to the operation and use of our Services (like password resets).

2.2. Promotional Communications. If you are an Account Owner or Administrator, we may use your Personal Data to let you know about our products and services that we believe will be of interest to you. We may contact you by email or through other communication channels approved by you. We will always respect your preferences regarding how/whether you would like us to communicate with you. To ensure you have control over how we contact you with marketing offers:

2.2.1. We will take steps to limit direct marketing to a reasonable level and only send you communications which we believe may be of interest or relevance to you.

2.2.2. You can ask us to stop sending email marketing by following the “unsubscribe” link you will find on all the email marketing messages we send you. Alternatively, you can contact us at support@connecteam.com.

2.2.3. You can change the way your browser manages cookies, which may be used to deliver online advertising, by following the settings on your browser as explained in our [Cookie Policy](#).

3. **Disclosing the Personal Data We Collect.** We disclose your Personal Data to other entities as follows:

3.1. Customers and other Users. If you are an Employee, Account Owner or Administrator, we may disclose your Personal Data to the Customer (or any individual acting on their behalf, for example an Account Owner or Administrator) with whom your account is associated, in our capacity as a “data processor”. This includes where we are requested to disclose Personal Data regarding your usage of the Platform or App, your chats, IP address, or geo-location that we have collected on our Customers’ behalf.

Other Users within the account may also have access to some of your Personal Data depending on the settings within the account (set by you or your Account Owner/Administrator).

3.2. Affiliates. We may disclose information, including your Personal Data, to our affiliates and subsidiaries (whether existing now or those that may be incorporated in the future).

3.3. Service Providers, and Subcontractors. We disclose information, including Personal Data we collect from and/or about you, to our trusted service providers and subcontractors, who have agreed to confidentiality restrictions and who use such information solely on our behalf in order to: (1) help us provide you with our Services; (2) aid in our understanding of how you use our Services; (3) improve, optimize and send promotional communications (see Section 2 above for more details); (4) deliver advertisements, search for audiences and conduct ad measurement, and (5) provide us with IT and system administration, data backup, security, and storage services, data analysis, data enrichment, and payment processing services.

3.4. Service Integrations. Our Customers may choose to use a third-party service to integrate with our Services (“**Third-Party Provider**”), or to enhance the usage of the Services (provided that our Services support such integration). The provider of such third-party service may receive certain relevant data about or from your account on the Services, or disclose certain relevant data from your account on the Third-Party Provider’s service to our Services, depending on the nature and purpose of such integration. This could include Users’ Personal Data and/or Customer Data. The processing of your Personal Data by the Third-Party Provider is subject to the agreement of the relevant Customer (or you) with such Third-Party Provider.

3.5. Change of Control; Business Interest. Should Connecteam or any of its subsidiaries or affiliates undergo any change in control or ownership, including by means of merger, acquisition or purchase of substantially all or part of its assets, your Personal Data may

be disclosed to or transferred to the parties involved in such an event. We may disclose Personal Data to a third-party during negotiation of, in connection with or as an asset in such a corporate business transaction. Personal Data may also be disclosed in the event of insolvency, bankruptcy or receivership. In addition, we may disclose your Personal Data where such disclosure is required to protect our legitimate business interests, including the security or integrity of our products and services.

3.6. Law Enforcement Related Disclosure. We may disclose your Personal Data to third parties: (1) if we believe in good faith that disclosure is appropriate to protect our or a third-party's rights, property or safety (including the enforcement of the Terms and this Privacy Notice); (2) when required by law, regulation subpoena, court order or other law enforcement related issues, agencies and/or authorities; or (3) as is necessary to comply with any legal and/or regulatory obligation.

3.7. Feedback or Recommendations. If you submit a public review or feedback, note that we may (at our discretion) store and present your review publicly on our Sites and Services. If you wish to remove your public review, please contact us at support@connecteam.com. If you choose to send others an email or message inviting them to use the Services, we may use the contact information you provide us to automatically send such invitation email or message on your behalf. Your name and email address may be included in the invitation email or message.

For the purposes of the CCPA, in the past twelve (12) months, we may have disclosed Identifiers; Customer Record Information; Internet or other electronic network activity information; Geolocation data; Audio, Electronic, Visual, or Similar Information; Commercial Information; Professional or Employment-Related information; and Inferences to Customers, Affiliates, Service Providers, or for Law Enforcement Related Disclosures. We may have disclosed Identifiers; Customer Record Information; Internet or other electronic network activity information; and Commercial Information for Service Integrations. We may have disclosed Identifiers; Customer Record Information; Commercial Information; Professional or Employment-Related Information; or Audio,

Electronic, Visual or Similar Information related to Feedback or Recommendations. For the avoidance of doubt, Connecteam may disclose your Personal Data in additional manners, pursuant to your explicit approval, if we are legally obligated to do so, or if we have successfully rendered such data non-personal and anonymous.

4. **International Transfer.** We have an affiliate in the US, and we use subcontractors and service providers located in the EEA, the US, Israel and other jurisdictions, who process and store Personal Data. We conduct such international transfers for the purposes described above. We ensure that any third parties based in a third country and receiving Personal Data are subject to written agreements ensuring the same level of privacy and data protection as set forth in this Privacy Notice.

4.1. Connecteam is headquartered in Israel, a jurisdiction which is considered by the European Commission, the UK Secretary of State, and the Swiss Federal Data Protection and Information Commissioner, to be offering an adequate level of protection for Personal Data of individuals residing in EU Member States, the UK and Switzerland, respectively. We transfer data from the EEA, the UK and Switzerland to Israel on this basis.

4.2. Whenever we transfer your Personal Data to third parties based outside of the European Economic Area (“EEA”), the United Kingdom, and Switzerland to a third country which isn’t covered by an “adequacy decision” we ensure a similar degree of protection is afforded to it by signing specific contracts approved by the European Commission, the FDPIC and the UK Secretary of State, which give Personal Data the same protection it has in the EEA, Switzerland and the UK.

4.3. Please contact us at dpo@connecteam.com if you would like further information on the specific mechanism used by us when transferring your Personal Data out of the EEA, Switzerland, and the UK.

5. **Security**. We have implemented and maintain appropriate technical and organization security measures, policies and procedures designed to reduce the risk of accidental destruction or loss, and the unauthorized disclosure of or access to Personal Data appropriate to the Personal Data concerned. The measures we take include:

5.1. **Safeguards** – The physical, electronic, and procedural safeguards we employ to protect your Personal Data include secure servers, firewalls, antivirus, and SSL encryption of data.

5.2. **Access Control** – We manage system entries and limit access to authorized personnel on a need-to-know basis of least privilege rules, review permissions quarterly, and revoke access immediately after termination of our employees.

5.3. **Internal Policies** – We maintain and regularly review and update our privacy related and information security policies.

5.4. **Personnel** – We require new employees to sign non-disclosure agreements according to applicable law and industry customary practice.

5.5. **Encryption** – We encrypt data in transit using secure TLS/ SSL protocols.

5.6. **Database Backup** – Our databases are backed up periodically for certain data and verified regularly. Backups are encrypted and stored within the production environment to preserve their confidentiality and integrity, are tested regularly to ensure availability, and are accessible only by authorized personnel.

While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee that our Services will be immune from any malfunctions, unlawful interceptions or access, or other kinds of abuse and misuse.

As the security of information depends in part on the security of the computer you use to communicate with us and the security you use to protect user IDs and passwords, please take appropriate measures to protect this information.

6. Your Rights – How to Access and Limit Our Use of Certain Personal Data.

Subject to applicable law, and in some cases dependent upon the processing activity we are undertaking, you may have certain rights in relation to your Personal Data as detailed below:

6.1. Right of Access. To know what Personal Data we collect about you and, in some cases, to have such Personal Data communicated to you. Subject to applicable law, we may charge you a fee for this access. Please note that we may not be able to provide you with all the information you request, and, in such case, we will endeavor to explain why.

6.2. Right to Data Portability. If the processing is based on your consent or the performance of a contract with you and processing is being carried out by automated means, you may be entitled to (request that we) provide you or another party with a copy of the Personal Data you provided to us in a structured, commonly-used, and machine-readable format.

6.3. Right to Correct Personal Data. You may request that we update, complete, correct or delete inaccurate, incomplete, or outdated Personal Data.

6.4. Deletion of Personal Data (“Right to Be Forgotten”). You may request that we delete your Personal Data if either: (i) it is no longer needed for the purpose for which it was collected; (ii) our processing was based on your consent and you have withdrawn your consent (iii) you have successfully exercised your Right to Object (see below); (iv) processing was unlawful; or (iv) we are required to erase it in order to comply with a legal obligation. We cannot restore information once it has been deleted. Please note that in order to ensure we do not collect any further Personal Data, you should also delete our App from your mobile devices, terminate your account with us, and clear our cookies from any device where you have used our Platform or our App. We may retain certain Personal Data (including following your request to delete it) for audit and

recordkeeping purposes, or as otherwise permitted and/or required under applicable law.

6.5. Right to Restrict Processing. You may ask us to limit the processing of your Personal Data if either: (i) you have contested its accuracy and wish us to limit processing until this is verified; (ii) the processing is unlawful, but you do not wish for us to erase the Personal Data; (iii) it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise, or defend against a legal claim; or (iv) you have exercised your Right to Object (as described below) and we are in the process of verifying our legitimate grounds for processing. We may continue to use your Personal Data after a restriction request under certain circumstances.

6.6. Right to Object. You may object to any processing of your Personal Data which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests. If you raise an objection, we are granted the opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

6.7. Withdrawal of Consent. You may withdraw your consent in connection with any processing of your Personal Data based on previously granted consent. This will not affect the lawfulness of any processing prior to such withdrawal.

6.8. Right to Lodge a Complaint with Your Local Supervisory Authority. You may have the right to submit a complaint to the relevant supervisory data protection authority if you have any concerns about how we are processing your Personal Data, though we ask that as a courtesy you please attempt to resolve any issues with us first.

6.9. Right to opt-out the sale or sharing of personal information. You may have the right to opt-out the sale or sharing your Personal Information. For more information on how to opt-out the sale or sharing of your Personal Information, please refer to Section 9 below.

6.10. Right to equal services and prices. You may have the right not to be discriminated against when you exercise your privacy rights.

If you wish to exercise any of the above rights, please contact us at dpo@connectteam.com. We will investigate and attempt to resolve complaints and disputes and make every reasonable effort to honor your wish to exercise your rights as

quickly as possible, and, in any event, within the timescales provided by applicable data protection laws. We reserve the right to ask for reasonable evidence to verify your identity before we provide you with any information and/or comply with any of your requests, which may include asking you to sign into your account in the Services. To the extent applicable to you, you may also designate an authorized agent, in writing or through a power of attorney, to request to exercise your privacy rights on your behalf. The authorized agent may submit a request to exercise these rights by emailing us. If you are an Employee, for any requests to exercise such rights with respect to information we hold about you, please contact the applicable Customer directly.

7. Data Retention

7.1. Subject to applicable law, we retain Personal Data as necessary to maintain and expand our relationship with you and provide you with our Services and offerings; in order to comply with our legal and contractual obligations; or to protect ourselves from any potential disputes (i.e. as required by laws applicable to log-keeping, records and bookkeeping, and in order to have proof and evidence concerning our relationship, should any legal issues arise following your discontinuance of use), all in accordance with our data retention policy and at our reasonable discretion. We may delete information from our systems without notice to you once we deem it is no longer necessary for these purposes.

7.2. In some circumstances, we may store your Personal Data for longer periods of time, for instance, where we are required to do so in accordance with legal, regulatory, tax, audit, accounting requirements, for an accurate record of your dealings with us in the event of any legal challenges or complaints, or if we reasonably believe there is a prospect of litigation relating to your Personal Data or concerning our relationship. To determine the appropriate retention period, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal

Data, and whether those purposes can be achieved through other means, as well as applicable legal requirements.

7.3. With respect to data within our Services for which we serve as data processors (see “Materials you Upload” in section 1.2.4 above), we will retain that data for as long as directed by the applicable Customer. For example, a Customer may choose to archive Personal Data within the Platform of Employees who have been terminated, in which case such archived data will be retained until deleted by the Customer. If you have any questions regarding such Personal Data, please contact the relevant Customer directly.

7.4. Please contact us at dpo@connecteam.com if you have any questions regarding our data retention periods.

8. **Cookies and Similar Technologies.** We and our service providers use cookies, pixels, tags and other technologies in order for us to provide and monitor our Services and Site, to ensure that they perform properly, to analyze our performance and marketing activities, and to personalize your experience. Such cookies and similar files or tags may also be temporarily placed on your device. Certain cookies and other technologies serve to recall personal data, such as IP address, as indicated by you. To learn more about our practices concerning cookies and tracking, please see our [Cookie Policy](#).

9. **Opt-Out of Sale and Sharing.** Under some US data protection laws, like the CCPA, our disclosure of certain internet activity and device information to third parties through cookies or pixels and disclosures of identifiers to certain service providers may be considered a “sale” or “sharing” of Personal Information. We do so in pursuit of the business and commercial purposes described in Section 2 above. For the purposes of the CCPA, in the last 12 months we have “sold” or “shared” identifiers, customer records information, internet or other electronic network activity information, geolocation data, and commercial information with our analytics and advertising partners and service

providers. Connecteam has not knowingly sold or shared the personal information of individuals under the age of 16.

To opt out of all cookies that may result in a “sale” and/or “sharing” of your Personal Information in the following ways:

- On the cookie banner, click the “Do Not Sell Or Share My Personal Information” button, and move the toggle switch “Sale or Share of Personal Data” off.
- Click the “Do Not Sell Or Share My Personal Information” button (available in our website’s footer), and move the toggle switch “Sale or Share of Personal Data” off. Please note: If you visit us from a different device or browser, or clear cookies, then you need to return to this screen to re-select your preferences.
- Set the Global Privacy Control (GPC) for each participating browser system that you use to opt out of the use of third-party Advertising cookies (instructions on how to download and use GPC are available here).

10. **Third-Party Applications and Services.** All use of third-party applications or services is at your own risk and subject to such third party’s terms and privacy policies.

11. **Controller/Processor.**

11.1. Certain data protection laws and regulations, such as the GDPR or the CCPA, typically distinguish between two main roles for parties processing personal data: the “data controller” (or under the CCPA, “Business”), who determines the purposes and means of processing; and the “data processor” (or under the CCPA, “Services Provider”), who processes such data on behalf of the data controller (or business). Below we explain how these roles apply to our Services.

11.2. Connecteam is the “data controller” of: (1) its **Prospects’** and **Customers’** Personal Data, (2) **Account Owners’ & Administrators’** Registration Data, Payment Data, and Automatically Collected Data, (3) its **Users’** Communications Data, and (4) **Employees’** Automatically Collected Data, as detailed in Section 1 above. Accordingly,

we assume the responsibilities of a data controller (solely to the extent applicable under law), as set forth in this Privacy Notice.

11.3. Connecteam is the “data processor” of: (1) Materials Uploaded by **Users**, (2) **Employees’** Registration Data, and (3) Geo-Location Data, as submitted by our Customers and their Users to the Services, or automatically collected by our Services during the use of our Services by said Users. We process such data on behalf of our Customer (who is the “data controller” of such data) and in accordance with its reasonable instructions, subject to our Terms, our [Data Processing Addendum](#) (to the extent applicable) and other commercial agreements with such Customer.

11.4. Our Customers are solely responsible for determining whether and how they wish to use our Services, and for ensuring that all individuals using the Services on the Customer’s behalf or at their request, as well as all individuals whose Personal Data may be submitted to the Services, have been provided adequate notice and given informed consent to the processing of their Personal Data, where such consent is necessary or advised, and that all legal requirements applicable to the collection, use or other processing of data through our Services are fully met by the Customer. Our Customers are also responsible for handling data subject requests under applicable law, by their Users and other individuals whose data they process through the Services.

11.5. If you would like to make any requests or queries regarding Personal Data we process as a data processor on our Customer’s behalf, including accessing, correcting or deleting your data, please contact the Customer’s Account Owner or Administrator directly.

12. **Children.** We do not knowingly collect Personal Data from children under the age of sixteen. In the event that you become aware that an individual under the age of sixteen has enrolled without parental permission, please advise us immediately.

13. **Changes to the Privacy Notice.** We may update this Privacy Notice from time to time to keep it up to date with legal requirements and the way we operate our business. We will place any updates on this webpage. Please check this page regularly to make sure you are familiar with the latest version. If we make material changes to this Privacy Notice, we will inform you by notice on our Site, through the Services or by email.

14. **Comments and Questions.** If you have any comments or questions about this Privacy Notice or if you wish to exercise any of your legal rights as set out herein, please contact us at dpo@connecteam.com.

15. **DPO.** We have appointed a data protection officer (DPO) who is responsible for overseeing our privacy and data protection practices you may contact our DPO using the details set out below:

Email address: dpo@connecteam.com

Last updated: March 28, 2024