

## **Comm-IT's Privacy Policy**

This privacy policy explains how Comm-IT handles your personal information and data. The policy is structured so you can quickly find answers to the questions which interest you the most.

Your privacy is important to us. This privacy policy applies to all the services and services offered by Comm-IT and any affiliated entity (collectively "Comm-IT") except where otherwise noted. We refer to those services and services collectively as the "services" in this policy. This privacy policy describes how we collect, share, use, and protect the information we collect when you use our services.

The terms "we," "our" and "us" in this Privacy Policy mean Comm-IT. The terms "you" and "your" refer to all users of the services. "Computer" means any personal computer, client computer, server computer, mobile device, communication device or any other device or system capable of accessing, communicating with, and/or using the services. By entering using the services through a computer you are consenting to our collection of your information as set forth in the privacy policy and as amended by us.

### **Your Consent**

By accessing, viewing and/or otherwise using the Site, you consent to (i) the collection, transfer, manipulation, storage, disclosure and other uses of your Information as described in the Terms of and Conditions Use and in this Privacy Policy, and (ii) to the transfer of such Information outside of the country where you reside in and outside the European Economic Area ("EEA"), to other countries for storage, processing and use by us, and to the transmission of data on an international basis.

Where we are processing data based on your consent, you have the right to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.

## **Information We Collect**

When you open and/or use our services, we receive and collect certain information, including information about you. The information that we receive and collect depends in part on what you do when you use our services, and falls generally into one of two categories. Some of this information is information you submit, and other information is collected automatically when you access, e.g., when you open and/or use our Services.

### Information You Submit

Some of the information you may submit to use the services is personal information. Personal information means all data and/or information that identifies you. Examples of personal information we may collect include your internet protocol (IP) address. We use personal information to allow you to use services. By using the services and submitting personal information to us, you consent to our receiving and collecting this information.

### Automatically Collected Information

Every time you access our services, some non-personal information is automatically collected from you to enhance your experience with our services as well as to improve the design and content our services.

For example, we use cookies and tags to gather information about how individuals use and navigate our services. The data collected from cookies and tags are used to recognize repeat users and track usage patterns. Specifically, we use "cookies," which are small pieces of information sent by a web server and stored by a user's web browser. Cookies allow the web server to maintain an active "session" with an individual user and track what tools users are accessing via our services. By accessing our services,

you consent to our receiving and collecting this information. We use this automatically collected, non-personal information to track resources and data accessed via our services, to record general services statistics and activity, to troubleshoot problems, and to track what tools users are accessing on our services.

#### Information Collected During Your E-Mail Communications with Us

During or related to your accessing the services, you may send an e-mail or other electronic communication to us. When you send an e-mail or other electronic communication to us, you are communicating with us electronically and consent to receive reply communications from us electronically. We may retain the content of the e-mail or other electronic communication, your e-mail address or other identifier, and our response in order to better service your needs or for legal and regulatory reasons.

#### Information Collected During Your Employment

- During your employment timeframe, we collect personal information about users, based on the information that is being collected by the company, such as: FullName; eMail address; Phone number; Experience; Education; Skills and Objectives.

Other than that, we collect information based on Survey responses. When you log in the platform and interact with the questionnaire, any information that you post, display or submit on or through the surveys hosted by us, we also collect and store.

*Do You Administer the Surveys?* Surveys are administered by us. We host the surveys on our services and collect the responses submitted. If you have any questions about a survey you are taking, please contact Comm-IT CPO at [CPO@comm-it.com](mailto:CPO@comm-it.com) or your organization's manager who signed you up for this service.

*Are your survey responses anonymous?* Yes. If you respond to a survey, your email address is not automatically associated with the response; nor is it transmitted by us to your employer. However, there are rare circumstances whereby your employer may be able to associate responses with a person. For example, if one or a very small amount of people respond to a survey, your employer may be able intuit who provided to what responses.

*How does we use the information we collect?* We use the information we collect from you in order to provide you feedback. Furthermore, may make aggregate, anonymized, or anonymous data available to your employer for organizational effectiveness purposes. In all such instances, we will not disclose any identifiable information about you or your respondents.

*Do you sell your responses?* We do not sell, trade, or otherwise transfer your personal information or your survey responses, but we may make aggregate, anonymized, or anonymous data available to third parties for research or other purposes. We do not disclose your survey responses to your employer or to third parties.

### **“Cookies” - Information Placed Automatically on Your Computer**

When you view one of our Web sites, we may store some information on your computer in the form of a "Cookie" to automatically recognize you the next time you visit. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. We use traffic log cookies to identify which pages are being used. This helps us analyze data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system. Overall, cookies help us provide you with a better website, by enabling us to monitor which

pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

### **Safety of Minors**

Our services are not intended for and may not be used by minors. "Minors" are individuals under the age of majority in their place of residence. Comm-IT does not knowingly collect personal data from minors or allow them to register. If it comes to our attention that we have collected personal data from a minor, we may delete this information without notice. If you have reason to believe that this has occurred, please contact us at [CPO@comm-it.com](mailto:CPO@comm-it.com).

### **Other Uses or Sharing of Your Information**

In addition to those discussed in this privacy policy, we may use and share your information, including personal information, without limitation, in the following manner:

- In response to judicial or other governmental subpoenas, warrants and court orders served on us in accordance with their terms, or as otherwise required by applicable law;
- To comply with legal, regulatory or administrative requirements of governmental authorities;
- To protect our rights or property, protect our legitimate business interests, to enforce the provisions of our terms or policies, in cases of customer fraud/disputes, and/or to prevent harm to you or others;
- To protect or defend us, our subsidiaries, affiliates, or parent company and any of their officers, directors, employees, agents, contractors and partners, in connection with any legal action, claim or dispute;

- As disclosed in other applicable policies, terms of use, or other agreements;  
or
- As permitted or required by law or as authorized by you.

### **Security and Storage**

We are concerned about safeguarding the confidentiality of your information. We adhere to accepted industry security standards that are designed to protect any non-public personal information collected by our services against accidental use, access, or disclosure. We provide physical, electronic, and procedural safeguards to protect information we collect, process, and maintain.

The technology we use is specifically designed for web servers. All of your personal information resides in a secure database behind a firewall where it cannot be accessed without proper authentication. Information collected by our Services is protected by Secure Socket Layer ("SSL") technology, a leading security protocol for data transfer on the Internet. Secure Socket Layer ("SSL") technology encrypts your personal information.

Please remember that no method of transmission, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security. We also do not guarantee the confidentiality or security of electronic transmissions via the Internet due to potentially unsafe computers or links. This could result in data becoming lost or intercepted during transmission. Please use good judgment before deciding to send information via the Internet.

### **Retention Period**

The Information will be stored either for a period of one year or for as long as needed for business usage. If in the future we intend to process the Information for a purpose other than that which it was collected we will provide you with information on that purpose and any other relevant information.

### **Data Subjects Rights:**

Under the General Data Protection Regulation (GDPR) and The Data Protection Act 2018 (DPA) you have a number of rights with regard to your personal data. You have the right to request from us access to and rectification or erasure of the Information, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability restrict processing, object to processing as well as in certain circumstances the right to data portability.

You have the right to lodge a complaint to us if you believe that we have not complied with the requirements of the GDPR or DPA by contacting as specified below

### **Stopping Collection of Information**

If you would like us to delete information that you submit, please contact us at [CPO@comm-it.com](mailto:CPO@comm-it.com) and we will respond in a reasonable time.

### **Changes to our Privacy Policy**

We may make changes to our privacy policy from time to time. When we change the privacy policy in a material way, a notice will be placed at our services along with the changed privacy policy. It is your responsibility to review this privacy policy frequently and remain informed about any changes to it, so we encourage you to visit this page often. Your continued use of our services constitutes your acceptance of any amendments to and the most recent versions of this privacy policy.

### **Questions or Comments**

If you have any questions or comments concerning our Privacy Policy please contact us at [CPO@comm-it.com](mailto:CPO@comm-it.com).